



PRIVACY & COOKIES POLICY

Last updated: July 10, 2026

1. Aim And Scope

ID. FRONTISTIRIO E.N.A. HOMEWORK TO GO, a company incorporated in the Republic of Cyprus (Company number: HE 375952), with its registered address at Miltonos 44, 3050 Lemesos, Limassol, Cyprus (the “School”, “we”, “us”, or “our”), operates under the trademark NEO STUDY and is committed to protecting the confidentiality and privacy of personal data entrusted to it.

This Privacy & Cookies Policy explains in which contexts we process personal data, the purposes and legal bases for such processing, how we protect personal data, with whom we may share it, how long we retain it, and the rights available to data subjects.

We process personal data relating to prospective, current and former students and their parents or representatives as part of our educational services. We also process personal data relating to staff, suppliers, contractors, supporters and visitors where relevant. We acknowledge our obligations under applicable data protection legislation and aim to comply with the General Data Protection Regulation (EU) 2016/679 (“GDPR”), as applicable in the Republic of Cyprus, and any relevant national implementing law currently in force.

2. Key Definitions And Roles

2.1 Controller and processing

For the purposes of this Policy, the School acts as the controller of personal data, meaning that it determines the purposes and the means of processing personal data.

“Processing” means any operation or set of operations performed on personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

2.2 Data Protection Officer (DPO)

The School appoints a Data Protection Officer (“DPO”). The DPO supports compliance by, among other things, coordinating and monitoring data management training, fostering a positive data culture and best practices, providing advice on data-related matters, assessing the severity of personal data breaches and supporting remediation, and overseeing the implementation of internal data protection policies.

To exercise any rights described in this Policy or to request further information, please contact the DPO at: info@neostudy.school.

3. Personal Data We May Collect

We collect and process personal data that is relevant to our educational and operational activities. The categories of personal data we may collect depend on the specific purpose and context.

- Identification information: name, first name, last name, ID card or passport number, email address, postal address, fixed and/or mobile phone numbers.
- Family details: parents’/guardians’ names, telephone numbers, passport numbers, and addresses.
- Financial information: bank account details and fee-related information.

- Electronic identification data (where necessary to deliver services): login credentials, access rights, passwords, employee numbers, IP addresses, online identifiers/cookies, logs, access and connection times.
- Admissions, academic, disciplinary and other education-related records: information about special educational needs, references, examination scripts and marks, and other records relating to academic performance and student conduct.
- Behavioral data and student preferences/interests.
- Education and employment data (where relevant).
- Images, audio and video recordings (e.g., events, activities, security systems).
- Details of courses, meetings or events attended.
- Health data: medical history, allergies, immunization records, disorders, medical examination results, and other medical data of students (where relevant).

4. How We Collect Personal Data

We primarily collect personal data directly from the individual or, in the case of students, from parents/guardians or authorized representatives. In certain instances, we may also obtain personal data from third parties such as referees, previous schools, professionals, or authorities involved with the individual. We may also obtain data from publicly available sources where appropriate.

We also collect personal data through social media advertising platforms and lead generation tools (including, but not limited to, Meta Platforms, Facebook Lead Ads, and Instagram Lead Forms) where users voluntarily submit their contact details to request information about our educational services and seasonal programs.

5. Access To Personal Data And Disclosures

Within the School, access to personal data is granted only to staff members and collaborators who require it to perform their duties and to provide educational or ancillary services. Access is controlled by role-based permissions and need-to-know principles.

We do not disclose or sell personal data to other organizations for their own independent purposes. We may share personal data, including special category personal data where necessary, with third parties in the ordinary course of the School's activities, and only where there is an appropriate legal basis and safeguards.

Categories of recipients may include:

- Public authorities and institutions, both national and foreign, including competent education authorities, judicial courts, and foreign embassies or diplomatic missions (where applicable).
- Relevant authorities such as the Ministry of Education, Department of Statistics, Immigration Office, Tax Department, and Social Insurance Services.
- Examination boards and bodies administering internal and public examinations.
- Professional advisers such as tax, legal and accounting consultants.
- IT and platform providers, including hosted databases, the School website, school calendar, school email, virtual learning environments, and applications.
- Providers of on-campus services (e.g., meal services) and operational service providers (e.g., courier services, utilities).
- Education-related partners and service providers (e.g., travel agencies, catering and transportation providers) in connection with trips, activities and events.

- Photographers and video crews engaged by the School in relation to events and publications.

Where systems and services are provided by third-party providers, these arrangements are subject to contractual assurances requiring that personal data is securely maintained and used only in accordance with our documented instructions.

6. International Transfers

We do not transfer personal data outside the European Economic Area (“EEA”) unless we are satisfied that the data will receive an equivalent level of protection, including through appropriate safeguards such as adequacy decisions, standard contractual clauses, or other measures recognized under applicable law.

7. Purposes For Which We Use Personal Data

We process personal data for a range of purposes, including:

- Provision of educational services: application and admissions, student enrollment, class administration, timetable management, teaching activities, administration of internal and public examinations, assistance with university applications, and issuance and storage of academic records.
- Provision of ancillary educational services: pastoral care, career and personal counseling, library services, extracurricular activities, school trips, management of school publications, setup and operation of virtual learning environments, and granting access to School intranet and internet networks. We may monitor the use of School networks and platforms to ensure appropriate usage.
- Campus and community security: monitoring access to premises and, where applicable, video surveillance in line with legal requirements.
- Medical care and counseling: providing appropriate medical support and counseling services to students where needed.
- School administration and operations: student records and academic documentation, administration of fees and accounts, internal audits and controls, reports and statistics, implementation of School policies, collaboration with other educational institutions, archiving, quality assessment, and research activities.
- School-related communications: operational and administrative communications with students, parents/guardians, staff and other stakeholders through relevant communication channels.
- Fundraising and events: organizing fundraising and School events (e.g., concerts, theatrical performances, talent shows) and related communications, including where organized independently or in collaboration with trusted charitable foundations, where applicable.
- Operational management: management of School property, security and safety arrangements, management planning and forecasting, research and statistical analysis, administration and implementation of School rules and policies for students and staff, maintenance of archives and other operational purposes.
- Staff administration: recruitment and engagement of staff and/or sub-contractors, payroll and benefits administration, pensions and sick leave, performance review and appraisal, grievance/capability/disciplinary procedures, maintenance of HR records for current and former staff, and provision of references.
- Promotion, Lead Management, and Communications: promotion of the School through its website, prospectus, social media channels, and other publications. This includes managing prospective student inquiries and online leads, performing initial verification and qualification

contacts via telephone voice calls, SMS, and instant messaging applications (such as WhatsApp, Viber, or Telegram), and delivering direct marketing communications regarding our educational programs, camps, and events, subject to the user's consent or our legitimate interests.

- Dispute resolution and litigation: handling complaints, disputes, claims and legal proceedings where necessary.

8. Legal Bases For Processing

We process personal data on the legal bases set out in Article 6 of the GDPR, as applicable, depending on the context. These legal bases may include:

- Consent: where we request consent for specific purposes, such as the use of student photographs and videos in publications, or for direct marketing communications, including digital inquiries, social media lead form submissions, and subsequent follow-up telephone communications. Consent may be withdrawn at any time (e.g., verbally during a call or by contacting the DPO).
- Performance of an enrolment or service contract: where processing is necessary to perform a contract or to take steps at the request of the data subject prior to entering into a contract. Certain categories of personal data may be required for admission and the provision of educational services.
- Legal obligation: where processing is necessary to comply with a legal obligation to which we are subject (e.g., certain record-keeping duties; lawful video surveillance where applicable).
- Task carried out in the public interest: where processing is necessary for the performance of a task carried out in the public interest, including issuing and storing academic records and evaluating student performance in accordance with applicable education-related requirements.
- Legitimate interests: where processing is necessary for our legitimate interests (or those of a third party), provided that such interests are not overridden by the interests or fundamental rights and freedoms of the data subject. Examples may include ensuring the quality of educational services, monitoring the use of School systems to prevent misuse, ensuring security, enforcing legal claims, maintaining alumni relationships, collaborating with other institutions, and applying for grants or funding.

8.1 Special categories of personal data

Where we process special categories of personal data (e.g., health data), we do so in accordance with Article 9 of the GDPR, and where applicable, on legal grounds such as:

- Necessity for medical purposes: processing by the Medical Office for preventive or occupational medicine, medical diagnosis, and the provision of health or social care/treatment, based on Union or Member State law.
- Substantial public interest: where processing is necessary to assess a student's learning capacity and adapt teaching activities to special needs, based on Union or Member State law.
- Explicit consent: where required, such as disclosure of information regarding allergies, where applicable.

9. Cookies And Online Identifiers

When you use our websites, platforms or online tools, we may process online identifiers such as IP addresses, device identifiers, logs, access/connection times, and cookie or similar technology identifiers. These identifiers are used to support functionality, security, access management and the operation of online services.



You can control cookies through your browser settings and, where applicable, through cookie preference mechanisms on our websites. Disabling certain cookies may affect the availability or functionality of some services.

10. Security And Confidentiality Measures

We implement appropriate technical and organizational measures to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data. Measures include policies on the use of technology and devices, access controls to School systems, staff awareness and training, and confidentiality obligations.

Confidentiality is a core principle within the School and may be reflected in contractual terms with staff and external providers, including confidentiality or non-disclosure agreements where needed.

11. Data Retention

We retain personal data for legitimate and lawful reasons and only for as long as necessary for the purposes described in this Policy or as required by law.

- We retain personal data throughout the duration of the relevant contractual relationship, and for an additional standard period of 3 years thereafter, where deemed necessary for operational, quality and administrative purposes, and to respond to future requests relating to academic history.
- For prospective leads and inquiries that are determined to be non-target, irrelevant, or where the individual objects to further communication during the initial qualification phase, the personal data is restricted, archived, or erased from our active databases immediately or within a maximum of 30 days, ensuring no further marketing contact occurs.
- Academic records and other relevant documents related to student activities may be kept indefinitely where necessary to fulfill legal obligations and to maintain accurate educational records.
- Where specific legal requirements stipulate a minimum retention period, we retain personal data for at least the duration mandated by law.

We maintain a systematic process to identify and track the types and locations of personal data held. If you have questions about retention periods or wish to request erasure (where applicable), please contact the DPO.

Students can submit requests for their educational records by contacting the School administration. We aim to respond to requests regarding educational records within 15 school days. For requests pertaining to information held outside the educational record, we will respond within one month.

Members of staff act as representatives of the School. Information created, collected or retained in records or mark books regarding students is treated as personal data under this Policy and is subject to the School's data protection and retention practices.

12. Your Rights Under The GDPR

Subject to applicable conditions and exemptions, data subjects have the following rights:

- Right of access (Article 15): to request access to personal data and related information about processing.
- Right to rectification (Article 16): to request correction of inaccurate or incomplete data.
- Right to restriction (Article 18): to request restriction of processing in certain cases.
- Right to object: to object to processing based on Article 6(1)(e) or (f) in certain circumstances.
- Right to erasure (Article 17): to request deletion where applicable ("right to be forgotten").

- Right to data portability (Article 20): to receive personal data in a machine-readable format or transfer it to another controller, where conditions apply.
- Right to withdraw consent: where processing is based on consent, consent may be withdrawn at any time.

We respond to written requests as soon as reasonably practicable and within statutory time limits. For access requests, the response time is generally one month.

Certain data may be exempt from the right of access, including information identifying other individuals or data protected by legal privilege. We are not required to disclose student examination scripts, although examiners' comments may be shared. Confidential references provided for educational, training, or employment purposes may also be exempt.

13. Student Data Protection And Parental Access

In most cases, we rely on parental consent to process personal data relating to students, unless it is more appropriate to rely on the student's own consent given the nature of the processing and the student's age and understanding.

Parents should be aware that, depending on the child's interests, parental rights at law or under their contract, and the circumstances, they may not always be consulted regarding the processing of their child's personal data.

We generally assume that ordinary disclosure of students' personal data to their parents is not dependent on the student's consent. This includes sharing information about activities, progress, behavior and welfare. If a student requests confidentiality and withholds consent for disclosure to parents, we may have an obligation to maintain confidentiality unless there is a good reason to do otherwise (e.g., where disclosure is in the best interests of the student or other students, or is required by law).

Students who have sufficient maturity to understand their request may make subject access requests for their own personal data. A person with parental responsibility may also make a request on behalf of a student; however, the information is considered to belong to the child. Where appropriate, the consent or authority of the child (if of sufficient maturity) may be required.

14. Accuracy Of Information And Updates

We seek to keep personal data accurate and up to date. If there are changes to important information (e.g., contact details), please notify the School by contacting the DPO at info@neostudy.school.

This Policy should be read together with other School policies and terms and conditions that reference personal data, including the School application/admission documentation. We may update this Policy from time to time. Where changes are significant, we will provide notice through appropriate channels.

15. Complaints

If you have concerns regarding your data protection rights, please contact the DPO first. If you believe your rights under the GDPR have been violated, you have the right to lodge a complaint with the Office of the Commissioner for Personal Data Protection in Cyprus.

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