

SEMESTA SCHOOL
EVIDENCE DOCUMENT | EV-A7.5

Privacy Notice
Pemberitahuan Privasi
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WASC Criterion	A.7 — Systems Management for Data Protection and Cybersecurity
Related Policy	Data Protection and Privacy Policy (SSP-DP-004); Acceptable Use of Technology Policy (SSP-AUP-010)
Publication Format	This document is formatted for publication on semesta.sch.id. The bilingual (English and Bahasa Indonesia) format reflects the school's SPK status and its diverse parent community.

Note on Format: This document is presented as a WASC evidence file. The Privacy Notice text below is also prepared for publication on the school website (semesta.sch.id) in bilingual format. Each section presents the English text followed by the Bahasa Indonesia translation in italics. The WASC Visiting Committee is invited to review both the document content and the commitment to publish this notice on the school's public website by December 2025.

PRIVACY NOTICE / PEMBERITAHUAN PRIVASI

Semesta School | semesta.sch.id

Effective: 1 July 2026 / Berlaku: 1 July 2027 | Version 1.0

Semesta School ('the school', 'we', 'us') is committed to protecting the privacy and personal data of every student, parent, guardian, staff member, and visitor who interacts with our school. This Privacy Notice explains what personal data we collect, why we collect it, how we use and protect it, and what rights you have under Indonesian Law No. 27 of 2022 on Personal Data Protection (Undang-Undang Perlindungan Data Pribadi — UU PDP).

Semesta School ('sekolah', 'kami') berkomitmen untuk melindungi privasi dan data pribadi setiap siswa, orang tua, wali, anggota staf, dan pengunjung yang berinteraksi dengan sekolah kami. Pemberitahuan Privasi ini menjelaskan data pribadi apa yang kami kumpulkan, mengapa kami mengumpulkannya, bagaimana kami menggunakan dan melindunginya, serta hak-hak apa yang Anda miliki berdasarkan Undang-Undang No. 27 Tahun 2022 tentang Perlindungan Data Pribadi (UU PDP).

Please read this Notice carefully. If you have any questions, contact us at: info@semesta.sch.id | +62-24 76916060 | Jl. Raya Manyaran-Gunungpati Km 15, Semarang, Jawa Tengah, Indonesia.

Mohon baca Pemberitahuan ini dengan cermat. Jika ada pertanyaan, hubungi kami di: info@semesta.sch.id | +62-24 76916060 | Jl. Raya Manyaran-Gunungpati Km 15, Semarang, Jawa Tengah, Indonesia.

1. Who We Are / Siapa Kami

Semesta School is a SPK (Satuan Pendidikan Kerjasama — International Cooperation School) operating under the Semesta Al Fatih Foundation, located in Semarang, Central Java, Indonesia. We deliver the Cambridge International Education curriculum from Year 7 through Year 12 (Cambridge Lower Secondary, IGCSE, and A Level), alongside the Indonesian National Curriculum (Merdeka Belajar).

Semesta School adalah SPK (Satuan Pendidikan Kerjasama) yang beroperasi di bawah naungan Yayasan Semesta Alfatih, berlokasi di Semarang, Jawa Tengah, Indonesia. Kami menyelenggarakan kurikulum Cambridge International Education dari Kelas 7 hingga Kelas 12 (Cambridge Lower Secondary, IGCSE, dan A Level), bersama Kurikulum Nasional Indonesia (Merdeka Belajar).

As the institution that determines the purposes and means of processing your personal data, Semesta School acts as the Data Controller under UU PDP. Our designated data protection contact is the IT Director, reachable at it_director@semesta.sch.id.

Sebagai lembaga yang menentukan tujuan dan cara pemrosesan data pribadi Anda, Semesta School bertindak sebagai Pengendali Data berdasarkan UU PDP. Kontak perlindungan data kami yang ditunjuk adalah Direktur IT, yang dapat dihubungi di it_director@semesta.sch.id.

2. What Personal Data We Collect / Data Pribadi Apa yang Kami Kumpulkan

The table below shows the categories of personal data we collect, what specific data is included in each category, and the purpose for which we collect it.

Tabel di bawah ini menunjukkan kategori data pribadi yang kami kumpulkan, data spesifik apa yang termasuk dalam setiap kategori, dan tujuan pengumpulannya.

Category	Data Collected <i>Data yang Dikumpulkan</i>	Purpose <i>Tujuan</i>
Student Identity Data <i>Data Identitas Siswa</i>	Full name, date of birth, gender, nationality, student ID number, photograph. <i>Nama lengkap, tanggal lahir, jenis kelamin, kewarganegaraan, nomor ID siswa, foto.</i>	School administration, Cambridge examination registration, attendance records, Edunav learning profile, dormitory identification. <i>Administrasi sekolah, pendaftaran ujian Cambridge, catatan kehadiran, profil belajar Edunav, identifikasi asrama.</i>
Parent and Guardian Data <i>Data Orang Tua dan Wali</i>	Name, address, phone number, email address, relationship to student, emergency contact details. <i>Nama, alamat, nomor telepon, alamat email, hubungan dengan siswa, kontak darurat.</i>	Communication, emergency contact, authorised school pickup, parent portal access (Edunav). <i>Komunikasi, kontak darurat, penjemputan sekolah yang sah, akses portal orang tua (Edunav).</i>
Academic Records <i>Catatan Akademik</i>	Cambridge examination entries and results, internal assessment scores, grades, progress reports, Scheme of Work coverage, attendance records. <i>Pendaftaran dan hasil ujian Cambridge, nilai penilaian internal, nilai, laporan kemajuan, cakupan Rencana Program, catatan kehadiran.</i>	Monitoring student academic progress, Cambridge Centre administration, reporting to parents, curriculum planning, WASC self-study. <i>Pemantauan kemajuan akademik, administrasi Cambridge Centre, pelaporan kepada orang tua, perencanaan kurikulum, self-study WASC.</i>
Health and Medical Data <i>Data Kesehatan dan Medis</i>	Medical conditions, allergies, current medications, vaccination records, health incidents on school premises, UKS visit records. <i>Kondisi medis, alergi, obat-obatan saat ini, catatan vaksinasi, insiden kesehatan di lingkungan sekolah, catatan kunjungan UKS.</i>	Student health management, emergency medical response, UKS operations, Cambridge access arrangement applications. <i>Manajemen kesehatan siswa, respons medis darurat, operasional UKS, aplikasi pengaturan akses Cambridge.</i>
Safeguarding Records <i>Catatan Perlindungan Anak</i>	Safeguarding concern reports, disclosure records, investigation notes, external referral records. <i>Laporan kekhawatiran perlindungan, catatan pengungkapan, catatan investigasi, catatan rujukan eksternal.</i>	Child protection and safeguarding obligations under Indonesian Law No. 35 of 2014. <i>Kewajiban perlindungan anak berdasarkan UU No. 35 Tahun 2014.</i>
Dormitory and Residential Data <i>Data Asrama dan Residensial</i>	Room assignment, home leave records, coach observation notes, dormitory disciplinary records, overnight attendance. <i>Penugasan kamar, catatan izin pulang, catatan observasi pembina, catatan disiplin asrama, kehadiran malam.</i>	Residential life management, student safety and welfare, dormitory accountability. <i>Manajemen kehidupan asrama, keselamatan dan kesejahteraan siswa, akuntabilitas asrama.</i>
Financial Records <i>Catatan Keuangan</i>	School fee payment records, scholarship records, financial assistance records. <i>Catatan pembayaran biaya sekolah, catatan beasiswa, catatan bantuan keuangan.</i>	Fee administration and financial reporting. Financial records are managed by the school's Finance Department. <i>Administrasi biaya dan pelaporan keuangan. Catatan keuangan dikelola oleh Departemen Keuangan sekolah.</i>

Technology and System Use Data <i>Data Penggunaan Teknologi dan Sistem</i>	Edunav login records, system activity logs, Securly content filtering records (where a safeguarding alert is triggered). <i>Catatan login Edunav, log aktivitas sistem, catatan pemfilteran konten Securly (jika peringatan perlindungan dipicu).</i>	Platform operation, network security, safeguarding monitoring. <i>Operasional platform, keamanan jaringan, pemantauan perlindungan.</i>
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3. Legal Basis for Processing / Dasar Hukum Pemrosesan

Under UU PDP (Law No. 27 of 2022), we process your personal data on one or more of the following legal bases:
Berdasarkan UU PDP (UU No. 27 Tahun 2022), kami memproses data pribadi Anda berdasarkan satu atau lebih dasar hukum berikut:

- **Consent (Persetujuan):** Where you have given explicit consent for a specific processing activity — for example, consent for a student's photograph to be published in school communications. You may withdraw consent at any time.

Persetujuan: Di mana Anda telah memberikan persetujuan eksplisit untuk aktivitas pemrosesan tertentu — misalnya, persetujuan untuk foto siswa diterbitkan dalam komunikasi sekolah. Anda dapat menarik persetujuan kapan saja.

- **Contractual Obligation (Kewajiban Kontraktual):** Processing necessary to fulfil the school's obligations under the enrolment agreement — including delivering education, managing assessments, and communicating student progress.

Kewajiban Kontraktual: Pemrosesan yang diperlukan untuk memenuhi kewajiban sekolah berdasarkan perjanjian pendaftaran — termasuk memberikan pendidikan, mengelola penilaian, dan mengkomunikasikan kemajuan siswa.

- **Legal Obligation (Kewajiban Hukum):** Processing required by Indonesian law — including safeguarding reporting obligations under Law No. 35 of 2014, Cambridge examination administration requirements, and SPK licensing compliance.

Kewajiban Hukum: Pemrosesan yang diwajibkan oleh hukum Indonesia — termasuk kewajiban pelaporan perlindungan anak berdasarkan UU No. 35 Tahun 2014, persyaratan administrasi ujian Cambridge, dan kepatuhan lisensi SPK.

- **Vital Interest (Kepentingan Vital):** Processing necessary to protect the life or physical safety of a student or other person — including emergency medical processing and safeguarding responses.

Kepentingan Vital: Pemrosesan yang diperlukan untuk melindungi nyawa atau keselamatan fisik siswa atau orang lain — termasuk pemrosesan medis darurat dan respons perlindungan.

4. How We Share Your Data / Cara Kami Berbagi Data Anda

We do not sell, rent, or share your personal data with third parties for commercial purposes. We share data only in the following circumstances and only to the extent necessary:

Kami tidak menjual, menyewakan, atau membagikan data pribadi Anda kepada pihak ketiga untuk tujuan komersial. Kami berbagi data hanya dalam keadaan berikut dan hanya sejauh yang diperlukan:

Recipient / Penerima	Circumstances / Keadaan
Cambridge International Assessment (UK)	Student examination entries, centre registration data, and examination results, for the administration of Cambridge IGCSE and A Level examinations. Data pendaftaran ujian siswa, data registrasi pusat, dan hasil ujian, untuk administrasi ujian Cambridge IGCSE dan A Level.
Semesta Al Fatih Foundation	Governance-level reporting — aggregate data only unless individual data is required for a specific governance decision. Pelaporan tingkat tata kelola — data agregat saja kecuali data individual diperlukan untuk keputusan tata kelola tertentu.
Indonesian Government Authorities (Dinas Pendidikan, Kepolisian, KPAI, Dinas Sosial)	Where required by Indonesian law — including mandatory safeguarding reporting under Law No. 35 of 2014. Jika diwajibkan oleh hukum Indonesia — termasuk pelaporan perlindungan wajib berdasarkan UU No. 35 Tahun 2014.
School-Approved Technology Platforms (Edunav, latihan.id, Google Workspace for Education)	The minimum data necessary for the platform to function for educational purposes. Platforms are evaluated for their compliance with data protection standards before adoption. Data Processing Agreements are in place or in progress with all approved platforms. Data minimum yang diperlukan agar platform dapat berfungsi untuk tujuan pendidikan. Platform dievaluasi kepatuhannya terhadap standar perlindungan data sebelum diadopsi.
Receiving School (on student transfer)	Safeguarding records and academic records are shared securely with the receiving school's designated safeguarding lead within five school days of confirmed transfer. Catatan perlindungan dan catatan akademik dibagikan secara aman kepada pemimpin perlindungan sekolah penerima dalam lima hari sekolah setelah konfirmasi transfer.
Medical Professionals and Emergency Services	In a medical emergency, sufficient data to enable appropriate treatment. Dalam keadaan darurat medis, data yang cukup untuk memungkinkan penanganan yang tepat.

4.1 International Data Transfers / Transfer Data Internasional

Some of our approved technology platforms (including Google Workspace for Education and Cambridge International's systems) may process data on servers located outside Indonesia, including in the United States, Singapore, and the United Kingdom. Where this occurs, we ensure that appropriate data transfer safeguards are in place, including: contractual provisions in our agreements with platform providers; assessment of the receiving country's data protection framework; and where required, explicit consent from the data subject or their legal guardian.

Beberapa platform teknologi yang kami setuju (termasuk Google Workspace for Education dan sistem Cambridge International) dapat memproses data di server yang berlokasi di luar Indonesia, termasuk di Amerika Serikat, Singapura, dan Inggris. Dalam hal ini, kami memastikan bahwa pengamanan transfer data yang tepat tersedia, termasuk: ketentuan kontraktual dalam perjanjian kami dengan penyedia platform; penilaian kerangka perlindungan data negara penerima; dan di mana diperlukan, persetujuan eksplisit dari subjek data atau wali sah mereka.

5. How Long We Keep Your Data / Berapa Lama Kami Menyimpan Data Anda

Data Category / Kategori Data	Retention Period / Periode Penyimpanan
Student academic records	Duration of enrolment plus 10 years. Cambridge examination records are retained in accordance with Cambridge International's retention requirements. <i>Selama masa pendaftaran ditambah 10 tahun.</i>
Safeguarding records	Minimum 25 years from the date of the record, or until the student's 25th birthday — whichever is later. <i>Minimal 25 tahun dari tanggal catatan, atau hingga ulang tahun ke-25 siswa — mana yang lebih lama.</i>
Health and medical records	Duration of enrolment plus 10 years. <i>Selama masa pendaftaran ditambah 10 tahun.</i>
Parent and guardian contact data	Duration of enrolment plus 3 years. <i>Selama masa pendaftaran ditambah 3 tahun.</i>
Financial records	7 years from the date of the transaction, as required by Indonesian financial regulation. <i>7 tahun sejak tanggal transaksi, sebagaimana diwajibkan oleh peraturan keuangan Indonesia.</i>
CCTV footage (dormitory common areas)	30 days, unless retained for a specific security or disciplinary investigation. <i>30 hari, kecuali dipertahankan untuk investigasi keamanan atau disiplin tertentu.</i>
Website cookies and analytics data	As specified in the Cookie Policy on semesta.sch.id . <i>Seperti yang ditentukan dalam Kebijakan Cookie di semesta.sch.id.</i>

6. Your Rights / Hak-Hak Anda

Under Indonesian Law No. 27 of 2022 (UU PDP), you have the following rights in relation to your personal data held by Semesta School. To exercise any of these rights, please contact us at privacy@semesta.sch.id.

Berdasarkan UU No. 27 Tahun 2022 (UU PDP), Anda memiliki hak-hak berikut terkait data pribadi Anda yang dipegang oleh Semesta School. Untuk menggunakan hak-hak ini, hubungi kami di privacy@semesta.sch.id.

Your Right / Hak Anda	What This Means / Apa Artinya
Right to Access <i>Hak Akses</i>	You have the right to request a copy of the personal data we hold about you or your child. <i>Anda berhak meminta salinan data pribadi yang kami simpan tentang Anda atau anak Anda.</i>
Right to Rectification <i>Hak Perbaikan</i>	You have the right to ask us to correct any personal data about you or your child that is inaccurate or incomplete. <i>Anda berhak meminta kami untuk mengoreksi data pribadi tentang Anda atau anak Anda yang tidak akurat atau tidak lengkap.</i>
Right to Erasure <i>Hak Penghapusan</i>	You have the right to request that we delete personal data about you or your child in certain circumstances — for example, where the data is no longer necessary for the purpose for which it was collected. This right is subject to our legal obligations to retain certain records (see Section 5). <i>Anda berhak meminta kami menghapus data pribadi dalam keadaan tertentu. Hak ini tunduk pada kewajiban hukum kami untuk menyimpan catatan tertentu.</i>
Right to Restrict Processing <i>Hak Membatasi Pemrosesan</i>	You have the right to ask us to restrict how we process your data in certain circumstances — for example, while we investigate a complaint about accuracy. <i>Anda berhak meminta kami membatasi cara kami memproses data Anda dalam keadaan tertentu.</i>
Right to Withdraw Consent <i>Hak Mencabut Persetujuan</i>	Where we process data based on your consent, you have the right to withdraw that consent at any time. Withdrawal does not affect the lawfulness of processing carried out before withdrawal. <i>Di mana kami memproses data berdasarkan persetujuan Anda, Anda berhak mencabut persetujuan tersebut kapan saja.</i>
Right to Lodge a Complaint <i>Hak Mengajukan Pengaduan</i>	If you believe that we have not processed your data in accordance with UU PDP, you have the right to lodge a complaint with the Indonesian Ministry of Communications and Digital Affairs (Kominfo) or to seek legal recourse through the Indonesian courts. <i>Jika Anda percaya bahwa kami tidak memproses data Anda sesuai UU PDP, Anda berhak mengajukan pengaduan kepada Kominfo atau mengajukan gugatan hukum.</i>

Response Time: We will respond to all data rights requests within 30 calendar days of receipt. Where a request is complex or we receive a large number of requests simultaneously, we may extend this period by a further 30 days — but we will notify you of the extension and the reason before the initial 30-day period expires.

Waktu Respons: Kami akan merespons semua permintaan hak data dalam 30 hari kalender setelah diterima. Jika permintaan kompleks, kami dapat memperpanjang periode ini dengan 30 hari lagi — tetapi kami akan memberi tahu Anda tentang perpanjangan dan alasannya sebelum periode 30 hari awal berakhir.

7. How We Protect Your Data / Cara Kami Melindungi Data Anda

Semesta School takes the security of personal data seriously. We have implemented the following technical and organisational measures to protect personal data against unauthorised access, loss, destruction, or alteration:

Semesta School mengambil keamanan data pribadi dengan serius. Kami telah menerapkan langkah-langkah teknis dan organisasi berikut untuk melindungi data pribadi dari akses tidak sah, kehilangan, perusakan, atau perubahan:

- Data encryption for data in transit and at rest on school-managed systems.
 - *Enkripsi data untuk data yang sedang ditransfer dan disimpan di sistem yang dikelola sekolah.*
- Role-based access control: staff access only the data necessary for their specific role. No staff member has unrestricted access to all student data.
 - *Kontrol akses berbasis peran: staf hanya mengakses data yang diperlukan untuk peran spesifik mereka.*
- Firewall and anti-malware protection on all school network infrastructure.
 - *Perlindungan firewall dan anti-malware pada semua infrastruktur jaringan sekolah.*
- Securly content filtering and network monitoring to detect unusual activity.
 - *Pemfilteran konten Securly dan pemantauan jaringan untuk mendeteksi aktivitas yang tidak biasa.*
- Regular data protection training for all staff handling personal data.
 - *Pelatihan perlindungan data secara berkala untuk semua staf yang menangani data pribadi.*
- Physical security: student records are stored in locked cabinets or secured digital systems. Paper documents containing personal data are shredded when no longer needed.
 - *Keamanan fisik: catatan siswa disimpan dalam lemari terkunci atau sistem digital yang aman.*
- Data breach response protocol: where a breach occurs or is suspected, the IT Director initiates the response procedure and — where the breach may affect individual rights — notifies the affected individuals and relevant authorities within 72 hours.
 - *Protokol respons pelanggaran data: jika terjadi pelanggaran, Direktur IT memulai prosedur respons dan memberi tahu individu yang terdampak dalam 72 jam.*

8. Cookies and Website Analytics / Cookie dan Analitik Situs Web

The Semesta School website (semesta.sch.id) uses cookies to improve your experience and to understand how visitors use the site. When you first visit our website, you will be asked to accept or decline cookies through our cookie consent banner. You can manage your cookie preferences at any time through your browser settings. For full details of the cookies we use and how to manage them, please see our Cookie Policy at semesta.sch.id/cookie-policy.

Situs web Semesta School (semesta.sch.id) menggunakan cookie untuk meningkatkan pengalaman Anda dan memahami bagaimana pengunjung menggunakan situs. Saat pertama kali mengunjungi situs kami, Anda akan diminta untuk menerima atau menolak cookie melalui banner persetujuan cookie kami. Untuk detail lengkap tentang cookie yang kami gunakan, lihat Kebijakan Cookie kami di semesta.sch.id/cookie-policy.

9. Changes to This Notice / Perubahan pada Pemberitahuan Ini

We review and update this Privacy Notice at least once a year. If we make any significant changes — particularly changes that affect how we process student personal data — we will notify parents and guardians directly by email and will publish the updated Notice on semesta.sch.id at least 30 days before the changes take effect.

Kami meninjau dan memperbarui Pemberitahuan Privasi ini setidaknya setahun sekali. Jika kami melakukan perubahan signifikan — terutama yang memengaruhi cara kami memproses data pribadi siswa — kami akan memberi tahu orang tua dan wali secara langsung melalui email dan akan menerbitkan Pemberitahuan yang diperbarui di semesta.sch.id setidaknya 30 hari sebelum perubahan berlaku.

10. Contact Us / Hubungi Kami

Data Protection Contact /Kontak Perlindungan Data	IT Director, Semesta School it_director@semesta.sch.id
Postal Address /Alamat Pos	Semesta School, Jl. Raya Manyaran-Gunungpati Km 15, Semarang, Central Java, Indonesia 50224
Telephone / Telepon	+62-24 76916060
School Website / Situs Web	semesta.sch.id
Supervisory Authority /Otoritas Pengawas	Kementerian Komunikasi dan Digital (Kominfo) Jl. Medan Merdeka Barat No. 9, Jakarta 10110 www.kominfo.go.id