

# Privacy Policy

## Contact Details

Pursuant to the General Data Protection Regulation, national data protection laws of the various Member States, and other privacy regulations, the responsible entity (“Controller”) is:

**DIGIPRO EDUCATION LTD** a limited liability company incorporated under the laws of the Republic of Cyprus with company registration number HE42033, whose principal place of business is at 65 Neophytou Nikolaides Street, 8011, Paphos, Cyprus.

### A. Data Processing

#### 1) **Type of personal data held by the DIGIPRO EDUCATION LTD and categories of personal data concerned:**

The DIGIPRO EDUCATION LTD holds information relating to you from the FUNecole platform.

Our records contain the below personal data which concern the following categories of respective data:

- First name, last name/ surname of students, teachers & school admins upon registration,
- Email address of students, teachers & school admins upon registration,
- Home address (street, zip, postal code, city) of students, teachers & school admins upon registration,
- Phone number of students, teachers & school admins upon registration,
- Date of birth of students upon registration,
- IP adress upon login and
- Drawing and exercises (paint, word, excel, ppt etc.).

#### 2) **To whom we share your personal information with?**

DIGIPRO EDUCATION LTD is committed not to share personal data to third parties.

Exceptionally, we may share your personal data:

(a) to the competent public services and judicial authorities, in order to comply with our legal obligations, and

(b) to third parties providing services to DIGIPRO EDUCATION LTD, such as IT Service Providers, service providers and storage facilities, and only to the extent which is necessary for the provision of services to us and / or you.

When the said service providers perform services to us, they act as processors and therefore process personal data solely on behalf of and on the basis of recorded orders of our Company and are not entitled to re-use the data for their own benefit.

### **3) Security of your personal data**

The security of your personal data is our primary purpose. We take and apply the highest technical and organizational measures to ensure the integrity, confidentiality and availability of personal data and to protect them against the risk of unauthorized access, misuse, disclosure, illegal destruction or loss.

### **4) For how long do we retain your personal data?**

The retention period for which DIGIPRO EDUCATION LTD holds your personal data is the period necessary to perform its contractual obligations and deliver its services. The data will be deleted when they are no longer needed for the purpose for which they were processed.

### **5) The purpose and legal basis for the processing**

DIGIPRO EDUCATION LTD owns and operates FUNecole platform. FUNecole operates on a recurring revenue business model which usually takes the form of yearly subscriptions. DIGIPRO EDUCATION LTD provides annual user licenses to schools where teachers have access to lesson plans and exercises and deliver them to students via FUNecole platform. The personal data described above are processed in order to facilitate the creation of user names and passwords by DIGIPRO EDUCATION LTD team for research purposes and for the production of academic content.

The processing of your personal data relies on art. 6(1)(b) which provides that the processing will be lawful if the processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.

## **B. Your Reinforced rights**

The DIGIPRO EDUCATION LTD has taken appropriate measures to provide any information relating to your rights as well as the exercise of these rights. Under Chapter III of the GDPR you have the following rights:

### **1) Transparent information, communication and modalities for the exercise of your rights**

You have the right to be provided with your data freely and in an intelligible and easily accessible form. Following your request, DIGIPRO EDUCATION LTD shall provide information without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of requests. In that case the DIGIPRO EDUCATION LTD will inform you for the reasons of the delay.

### **2) Information to be provided where personal data are collected from the data subject**

You have the right to know the contact details of the agent who collects your data, the purposes of the processing for which the personal data are intended, the legal basis for the processing, the recipients or categories of recipients of the personal data and where applicable the fact that the controller intends to transfer personal data to a third country.

### **3) Right of access**

You have the right to request and receive a copy of your personal data undergoing processing. However, for any further copies requested, DIGIPRO EDUCATION LTD may charge you a reasonable fee that is based on administrative costs.

### **4) Right to rectification**

You have the right to obtain from DIGIPRO EDUCATION LTD without undue delay the rectification of inaccurate personal data concerning you.

### **5) Right to erasure ('right to be forgotten')**

There is a right to ask for the erasure of your personal data and no longer processed where the personal data are no longer necessary in relation to the purposes for which they are controlled or otherwise processed.

Hence, in the cases where DIGIPRO EDUCATION LTD retains and process personal data in accordance with the provisions of Article 6(1)(b) of the GDPR, the University may object to such a request and may keep the relevant personal data that are required in order for DIGIPRO EDUCATION LTD to comply with its legal obligations.

#### **6) Right to restriction of processing**

You have the right of restricting processing where the accuracy of the personal data is contested by you, the processing is unlawful and there is pending verification as to whether the legitimate grounds of DIGIPRO EDUCATION LTD override those of your rights.

Therefore, we ensure that DIGIPRO EDUCATION LTD has in place a procedure where you have the right to restrict the processing of your personal data. Nonetheless, for those personal data that are necessary for compliance with a legal obligation, DIGIPRO EDUCATION LTD may object to the restriction.

#### **7) Right to data portability**

You have the right to receive the personal data concerning you, which you have provided to DIGIPRO EDUCATION LTD, in a structured, commonly used and machine-readable format and you have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided.

#### **8) Right to object**

You have the right to object to the processing of your personal data. However, since the DIGIPRO EDUCATION LTD lawfully processes such data under Article 6(1)(b), the DIGIPRO EDUCATION LTD will still have the right to process the data.

#### **9) Automated individual decision-making, including profiling**

You have the right no to be subject to a decision solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects.

#### **10) Right to lodge a complaint with the supervisory authority**