

Prowise Central Privacy Statement

At Prowise, your privacy is our top priority. This is rooted in a profound belief in the right to privacy, which is expressed in our privacy core values.

We Care	We Protect	We Do Not Share
		
<p>We handle your data with care and respect. When developing our products, privacy is our first concern.</p>	<p>We offer safe and secure solutions that have been certified by independent authorities.</p>	<p>We do not see data as a business model. We develop our products entirely independently and in-house.</p>

When this privacy statement applies and to whom

The Prowise Central (“**Central**”) operating system is installed on our touchscreens. You can use our touchscreens without using a Prowise Account. In this privacy statement, we explain to you when and how personal data may be processed in connection with the use of Central.

No automated decisions are taken through the Central Software.

If you use specific apps or services offered through our platform, such as a Prowise Account, our Prowise Cloud Platform Privacy Statement applies. If you use third-party apps or services, please review the specific privacy statements of the relative provider.

This privacy statement can be reviewed at any time in the Central environment on our touchscreens (“**Privacy Statement**”).



What Prowise offers

Prowise offers an overall solution for digital education in a safe learning environment and operates in several European countries.

Where this statement mentions "we/us" or "our/ours", this refers to Prowise B.V., with its registered office at Luchthavenweg 1B in (6021 PX) Budel, the Netherlands, and companies in the same group of companies, such as the parent organisation and/or sister companies (affiliated companies).

Contact

For questions regarding the field of privacy, including this privacy statement, please contact our Privacy Officer via the address above or via privacy@prowise.com.

Which personal data do we process?

We collect personal data that you share with us yourself, as well as information we gather automatically through the use of the Central environment in our Prowise Touchscreens.

You, as a user, can process personal data on the screen when you use our Touchscreens. Although these data are in no way accessible to or processed by Prowise, they may be visible to and/or erased by other users of the same Touchscreen if the previous user does not log out properly.

Prowise processes your personal data based on the following legal grounds in the privacy legislation:

- to be able to enter into and perform an agreement with you
- required for meeting our statutory obligations
- in the context of our legitimate business interest
- your specific and informed consent

Below, we explain which categories of data we may process, and for what purposes, for each of the functionalities within Central.

Central

The following information is processed within Central in order to enable you to use Central and to enable us to supply services and maintenance.

Category	Data
Technical details	<p>Device information (model, type, version, serial number, screen name (this last you can set yourself in the Prowise Touchscreens))</p> <p>Connectivity data (to make it possible to connect with the internal PC module and the Internet)</p> <p>If your Organisation's IT manager (package manager) has registered the Prowise Touchscreen to enable Screen Control, then the Technical details will be exchanged via Screen Control. For more information, see the Prowise Screen Control Privacy Statement.</p>
Users settings	<p>Language/country setting</p> <p>Display, image, sound and localisation settings will only be saved to your device.</p> <p>There are no audio or video recording options in Central. Images and sounds on a Prowise Touchscreen can be screened via an app intended for that purpose (Zoom, Skype, GoogleMeet, Teams, etc.).</p> <p>The apps, links and widgets on the start page are third-party apps for which the provider is responsible. For more information, see "Third-party Apps", below.</p> <p>If the Prowise Touchscreen has been registered to enable Screen Control, then the User Settings can be adjusted, and apps can be installed, remotely. More information about this is included in the Prowise Screen Control Privacy Statement.</p>
Log-in details	<p>Central offers the option to log in with a Prowise Account or a third-party app (e.g. Google via your Google ID). Central saves these log-in details to your device in order to be able to communicate with the relevant third-party app.</p> <p>More information about the personal data processed in this context can be found in our Prowise Cloud Platform Privacy Statement.</p>
Images	<p>At the user's option, images, which may contain personal data, can be stored at the Central home page (the start page displayed on your Prowise Touchscreen) or in your directories and files on the Central File Manager.</p> <p>All photos are stored on your device and Prowise has no access to these images.</p> <p>If the Prowise Touchscreen has been registered to enable Screen Control, then the background image can be adjusted remotely. For more information, see the Prowise Screen Control Privacy Statement.</p>

ProNote

ProNote can be used to take notes on the Prowise Touchscreen either by hand or by using the included pen accessory, and the notes are also saved in ProNote. These notes can be shared by scanning the QR code or by sharing them via e-mail. When the e-mail function is used, the personal data are processed by the external e-mail service provider, SendGrid Inc. When you share notes via e-mail, you agree to this e-mail provider's processing of the data put in the e-mail.

Category	Data
General information and contact details	Name and e-mail address of both the sender and receiver, if the notes are shared via e-mail
User information	Contents of the notes, also if you share this via QR code, or the personal message if the notes are shared

Reflect

Reflect makes it possible to stream content from external devices to the Prowise Touchscreen. Reflect is installed on the Prowise Touchscreen and can be disabled via Central.

We may process the following user data when Reflect is used.

Category	Data
Technical details	Device information (device name and screen resolution) IP address Connectivity data (to enable a connection between devices for streaming)

MOVE

The MOVE app can be used in combination with the MOVE camera on a Prowise Touchscreen. The MOVE app contains educational games that can be operated and played without physically touching the Prowise Touchscreen.

MOVE must be installed and activated by Central.

We process the following information when MOVE is used in order to optimise your use/continued use of MOVE:

Category	Data
User settings	Language/country setting

The MOVE camera is off by default (privacy cover on the camera). The MOVE camera must be activated manually through the MOVE app. The MOVE app only scans the user's body to enable the user to control and play the educational game. No images, sounds and/or personal or other data are recorded or saved.

Prowise's own Apps

A number of Prowise's own Apps, such as Presenter, come pre-installed on the Prowise Touchscreen. On these Apps, you must log in on a Prowise Account. The details regarding the data processed in these Apps are included in the Prowise Cloud Platform privacy statement.

Third-Party Apps

Third-party services and apps can be installed and used through Central to make content, products and/or services available to you ("**Third-Party Apps**"). We do not control or manage the functioning of such Third-Party Apps and these are excluded from this Privacy Statement. We are not responsible for the content, security, privacy settings or privacy in general of such Third-Party Apps.

The purpose and scope of the data processing by the provider of the Third-Party Apps in question and the relevant further processing of your data, as well as your rights in this respect, can be found in the privacy policy and/or the privacy statement of the Third-Party Apps in question. These are also included in the Prowise Appstore. We recommend that you read these before you use these Third-Party Apps.

Who has access to your personal data?

Your personal data may be exchanged between the companies within the Prowise business group, currently consisting of Prowise BV, Prowise R&D BV, Oefenweb.nl, Prowise GmbH, Prowise UK Limited, and Prowise BVBA.

We will not provide your data to third parties, unless we are required to do so to perform the services requested by you or pursuant to a statutory obligation. If necessary, we will conclude an agreement which includes stipulations on confidentiality and security.

The parties with which such agreements may be made include:

Hosting providers and e-mail providers
IT and Security Service providers
Consultants
Government agencies

We may share your data if we are involved in a merger, takeover or sale of all or part of our assets. In other cases, we will only share your personal data if you have given us prior permission to do so. We will under no circumstances sell your data to third parties.

If we suspect fraud or abuse of the Central environment, we may provide personal data to the competent authorities.

Safeguarding international data transfer

We are doing our best to keep your data in the European Economic Area (EEA). In some cases, service providers outside of the EEA provide a higher level of services, particularly in the field of security, in which case we opt for quality.

We will only provide your personal data to parties outside of the EEA if they provide an appropriate level of protection for the processing of personal data. This means that we will conclude an agreement with such parties, which will include the relevant model clauses made available by the European Commission.

Security

We secure Central and the Prowise Touchscreen by taking technical and organisational measures against loss of, destruction of, access to, alteration of or dissemination of your data by unauthorised parties. Examples of this include locking the Prowise Touchscreen with a PIN number, the Reflect PIN number or a factory reset of the screen which will delete all information and data.

Furthermore, the Prowise Touchscreen complies with general certification, including in the areas of privacy and security. In addition, the processes within Prowise are certified and internal and external audits take place regularly. We take immediate action if these audits deem such necessary or advisable. Unfortunately, despite all precautions and regular audits, absolute protection against all dangers is impossible, but we do everything in our power to make sure our security levels conform with the applicable standards.

How long do we keep your data?

We will not store your data longer than necessary for the purposes for which we process them, unless the data must be stored for a longer period of time to comply with statutory obligations (for example a retention obligation). The duration of the retention period depends on the nature of the data and the purposes for which they are processed. The retention period can therefore differ per purpose.

What are your privacy rights?

You have the following privacy rights:

- Right of access (Article 15 GDPR)
- Right to rectification (Article 16 GDPR)
- Right to be forgotten (Article 17 GDPR)
- Right to restriction of processing (Article 18 GDPR)
- Right to data portability (Article 20 GDPR)

When the processing is based on your consent as referred to in the GDPR, you will always have the right to revoke this consent for future processing.

You can contact us about this via privacy@prowise.com. Please note that for such requests, we need to verify that you are actually the person in question.

Right to object

Aside from the rights above, you can also object to the processing of certain data.

Right to object (Article 21 GDPR)

In so far we process personal data based on our legitimate interest or the legitimate interest of a third party, you are entitled to object to this. You can do so based on reasons linked to your specific situation.

You can make an objection via the contact details specified in this privacy statement.

Complaints

You also have the right to submit a complaint about the manner in which we handle your data. If you have a complaint, we prefer to resolve it with you ourselves. Therefore please contact us if you have a complaint. If you are not satisfied with the handling of your request or complaint, you are entitled to submit a complaint with the competent supervisory authority. To this end, you can contact the Dutch Data Protection Authority, which acts as our leading supervisory authority, at all times. For this we refer you to the [website of the Dutch DPA](#).

Version and amendments

Legislative amendments, changes to our internal processes, or other new developments may require us, or make it advisable for us, to amend this privacy statement. We recommend that you review this privacy statement regularly so that you are aware of these amendments.

This statement was last amended on 24 May 2022.