
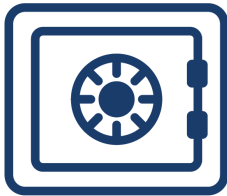



# Privacy Statement

## Prowise Cloud Platform

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>

### Who is Prowise?

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

Where this statement mentions “**Prowise**”, “**we/us**” or “**our/ours**”, this refers to Prowise B.V., with its registered office at Luchthavenweg 1B, 6021 PX in 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, you can contact our Data Protection Officer via the address above or through [privacy@prowise.com](mailto:privacy@prowise.com).



## When does this privacy statement apply?

This privacy statement applies to personal data processed by Prowise in the context of the use of our Cloud Platform (the “**Services**”). This privacy statement governs solely the use of our Services and the processing of personal data in connection therewith.

For processing of personal data outside of the scope of the Services we refer to our general Privacy Statement available at our general website.

## To whom does this privacy statement apply?

All users of the Services who create or use a personal account are data subjects in this respect and are referred to as “**User**”, “**you**” or “**your**”.

We differentiate between the following categories of Users:

- Professional User
  - You are in this category when your employer, educational institution or organisation (collectively “**Organisation**”) purchases Products (e.g. Prowise Touchscreens) or Services from Prowise and provides you with access to our Services
  - Your Organisation acts as Data Controller and Prowise is Data Processor (see below for more information)
- Individual (non-business) User
  - You are in this category if you use our Services on your own initiative and created a (free) account
  - Prowise acts as Data Controller

No automated decision making takes place via the use of our Services.

## Prowise as Data Processor

If you are a Professional User, your Organisation (our Client/Customer) acts as Data Controller based upon GDPR and is responsible for the processing of your personal data. Prowise operates as a Data processor and we then process personal data based upon contractual agreements with your Organisation laid down in the Data Processing Agreement.

Your Organisation may provide you with an additional, more specific privacy statement and terms tailored to how our Services are used by the Organisation, their scope, as well as the Organisation’s internal policies and

practices. We urge you to review any such additional notices and to contact your Organisation should you have any questions.

## Prowise as School Service Provider

In our role as school service provider we have committed ourselves to the Student Privacy Pledge. More information on how we process student personal data in our role as school service provider can be found below under “*Personal data from United States K-12 students*”.

## Which personal data do we process?

We collect personal data you provide us yourself, and also information we obtain automatically from your use of our Services.

Below we explain which categories of personal data we process.

Service	Category of personal data
<b>Account Portal</b> (registration of a Prowise Account)	<ul style="list-style-type: none"> <li>● General and contact details (e.g. name and email address)</li> <li>● Login details (e.g. username and password)</li> <li>● Identification details (administration number, e.g. education participant number if you’re a Professional User)</li> <li>● Organisation information (information relating to our Organisation, e.g. name Organisation, group, class and role)</li> <li>● User settings and actions (e.g. language/country settings, registration and deletion date account, details on user sessions and log in)</li> <li>● Log files - technical data (e.g. browser identification and IP address)</li> </ul>
<b>Reflect</b> (app can be used on your device in connection with a Prowise Touchscreen)	<ul style="list-style-type: none"> <li>● Log files - technical data               <ul style="list-style-type: none"> <li>○ Device information (model, operating system, type, version, serial number)</li> <li>○ Browser identification (user agent)</li> <li>○ IP address</li> <li>○ Connectivity details (to connect devices to enable casting)</li> </ul> </li> <li>● User settings ( country/language settings on your device)</li> </ul>
<b>Presenter</b>	<ul style="list-style-type: none"> <li>● Details Account Portal (registration of a Prowise Account)</li> <li>● User content               <ul style="list-style-type: none"> <li>○ User files (text and (video) images with or without sound)</li> <li>○ ProConnect user files (voting/quizzing/mindmaps)</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>• General and contact details &amp; Organisation information (when posting and sharing files or data in the Presenter Community)</li> </ul>
<p><b>ProConnect</b> (use in connection with Presenter)</p>	<ul style="list-style-type: none"> <li>• Log files - technical data <ul style="list-style-type: none"> <li>○ Device information (model, operating system, type, version, serial number)</li> <li>○ Browser identification (user agent)</li> <li>○ IP address</li> <li>○ Connectivity details (to connect devices to enable educational quizzes or games to be created and played)</li> </ul> </li> <li>• User settings (country/language settings on your device)</li> </ul>
<p><b>GO</b></p>	<p>Service available to schools in the Netherlands consisting of an online learning environment with full IT management and support. This Service can only be used as a Professional User and includes the Services within our Cloud Platform (such as Presenter and Learn).</p>
<p><b>GO plugin</b> (used by GO users and facilitates the communication between Chromebooks of students and their teachers)</p> <p>Some features are only available after obtaining further consent</p>	<p>When using the GO Plugin, the following user data of students may be processed by us:</p> <ul style="list-style-type: none"> <li>• User content <ul style="list-style-type: none"> <li>○ DesktopCapture (current desktop screen of student's device)</li> <li>○ ActiveTab (current screen of student's device)</li> </ul> </li> <li>• User settings and actions <ul style="list-style-type: none"> <li>○ Tabs (web pages students are visiting at that moment and possibility to send/open new pages on student devices in the classroom of the teacher))</li> </ul> </li> <li>• Login details <ul style="list-style-type: none"> <li>○ Host permission (all students who are logged in (&lt;all_urls&gt;))</li> </ul> </li> <li>• Log files - technical data <ul style="list-style-type: none"> <li>○ Background scripts (to allow the teacher to send you links when Chrome is in the background)</li> <li>○ Remote code (use Firebase to exchange information between student and teacher)</li> </ul> </li> </ul>
<p><b>Learn</b></p>	<ul style="list-style-type: none"> <li>• Account details (registration of a Learn account) <ul style="list-style-type: none"> <li>○ General and contact details</li> <li>○ Login details</li> <li>○ Identification details (e.g. age)</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>○ Organisation information</li> <li>● Diagnostic and usage data             <ul style="list-style-type: none"> <li>○ Learning achievements, e.g. completed exercises (incl. answers and response time)</li> <li>○ Derived data (user performance estimates and scores)</li> </ul> </li> <li>● User settings and actions             <ul style="list-style-type: none"> <li>○ Save settings</li> <li>○ Details on sessions and logins</li> <li>○ Level of user</li> </ul> </li> <li>● Log files - technical data             <ul style="list-style-type: none"> <li>○ Browser identification (user agent)</li> <li>○ IP address</li> </ul> </li> <li>● Anonymous data (for academic research purposes related to education and optimal learning methods)</li> </ul>
<b>Prowise Browser</b>	Prowise branded chromium browser designed for Prowise Touchscreens. No data is being processed by us.

## Legal grounds for processing?

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

- to conclude and execute an agreement with you
- necessary to fulfil our legal obligations
- in the context of our legitimate business interest
- your specific and informed consent

More specifically, the data is processed for one of the business purposes below:

- to enable you to use the Services
- to manage the Services (system administration and management, including troubleshooting specific issues and solving problems, maintaining the Services)
- to prevent abuse and improper use of the Services
- to improve the Services and user experience thereof including testing and improving new and existing Services
- support, handling questions and requests, handling complaints, handling and preventing claims
- to maintain contact with you and keep you informed of our products and services
- to comply with applicable laws and regulations and protect our rights and interests

## Personal data from United States K-12 students

In our role as school service provider for United States elementary and secondary schools we have committed ourselves to the Student Privacy Pledge. For more information about the Student Privacy Pledge, please visit this [website](#).

The Student Privacy Pledge commitments apply to Student Personally Identifiable Information (“PII”) which has the same definition as “covered information” under California’s Student Online Personal Information Protection Act (“SOPIPA”).

In our role as school service provider we will:

- collect, use, share, and retain Student PII only for purposes for which we were authorized by the educational institution/agency, teacher or the parent/student.
- disclose clearly in contracts or privacy policies, including in a manner easy for institutions and parents to find and understand, what types of Student PII we collect, if any, and the purposes for which the information we maintain is used or shared with third parties.
- support access to and correction of Student PII by the student or their authorized parent, either by assisting the educational institution in meeting its requirements or directly when the information is collected directly from the student with student/parent consent.
- maintain a comprehensive security program that is reasonably designed to protect the security, confidentiality, and integrity of Student PII against risks – such as unauthorized access or use, or unintended or inappropriate disclosure – through the use of administrative, technological, and physical safeguards appropriate to the sensitivity of the information.
- provide resources to support educational institutions/agencies, teachers, or parents/students to protect the security and privacy of Student PII while using the educational service.
- require that our vendors with whom Student PII is shared in order to deliver the educational service, if any, are obligated to follow these same commitments for the given Student PII.
- allow a successor entity to maintain the Student PII, in the case of our merger or acquisition by another entity, provided the successor entity is subject to these same commitments for the previously collected Student PII.
- incorporate privacy and security when developing or improving our educational products, tools, and services and comply with applicable laws.

In our role as school service provider we will not:

- collect, maintain, use or share Student PII beyond that needed for authorized educational/school purposes, or as authorized by the parent/student.
- sell student PII.
- use or disclose student information collected through an educational/school service (whether personal information or otherwise) for behavioral targeting of advertisements to students.

- build a personal profile of a student other than for supporting authorized educational/school purposes or as authorized by the parent/student.
- make material changes to School Service Provider education privacy policies without first providing prominent notice to the users and/or account holder(s) (i.e., the institution/agency, or the parent/student when the information is collected directly from the student with student/parent consent) and allowing them choices before data is used in any manner inconsistent with terms they were initially provided; and not make material changes to other policies or practices governing the use of Student PII that are inconsistent with contractual requirements.
- knowingly retain Student PII beyond the time period required to support the authorized educational/school purposes, or as authorized by the parent/student.

## Who has access to your personal data?

Your personal data may be shared 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 only share your personal data with third parties when required or permitted by law. If necessary, we will conclude an agreement which includes stipulations on confidentiality and security.

The parties with which such agreements are made include:

Hosting providers and e-mail providers

IT and Security Service providers

Financial services providers

Cookie providers (see cookie statement)

Consultants

Government agencies

We may share your personal data if we are in a process of merging, acquiring or disposing 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 further circumstances sell your data to third parties.

## Third-Party Apps

Our Services enable you to use third-party applications and services to make content, products, and/or services available to you ("Third-Party Apps"). Third-Party Apps are outside our control and are not covered by this Privacy Statement and we are not responsible for the content, security or privacy practices of such Third-Party Apps.

Your use of these Third-Party Apps is governed by and subject to the (licensing) conditions and privacy policies of the relevant Third-Party Apps. We recommend that you read the privacy statement of the Third-Party Apps before making use of these apps.

The following Third-Party Apps are available in or through our Services:

**Login via SSO** - if you login via SSO or you login to provide us credentials you may use a Google ID, Microsoft ID, Apple ID, SURFconext, KlasCement, Dropbox ID or other unique identification key from a third party, the privacy policy of the provider concerned may apply.

**YouTube** -when you search for YouTube videos, the Google Privacy Policy applies. The YouTube API is used within our Services to conduct search requests for YouTube videos and to display the search results within our Services through a link.

**Bing Search** - when you search for images via Bing Search, the Microsoft Privacy Statement applies.

**Flickr Search** - when you search for images via Flickr Search, the Flickr Privacy Policy applies.

**Rijksmuseum Search** (only available for users in the Netherlands and Belgium) - when you search for images via Rijksmuseum Search, the Rijksmuseum Privacy Policy applies.

**SchoolTV** (only available for users in the Netherlands and Belgium) - when you search for SchoolTV videos, the NTR Privacy Statement applies.

**Google Drive** - when you store files or data in your Google Drive account, the Google Privacy Policy applies.

**Dropbox** - when you store files or data in your Dropbox account, the Dropbox Privacy Policy applies.

**OneDrive** - when you store files or data in your OneDrive account, the Microsoft Privacy Policy applies

**Chromium** - when you use our Chromium Browser, the Chromium Privacy Policy applies.

## 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.

## How long do we keep your data?

Organisations (Customers/Clients) are responsible for the personal data for which they act as Data Controller and the proper retention.



When Prowise is the Data Controller, personal data is kept for as long as necessary to achieve the purposes laid down in this privacy statement or as required by contract or law. Personal data and user content are retained for up to six (6) months after termination of the Prowise account, unless you explicitly request a shorter retention period or if a longer period is required by law. If a shorter retention period is requested, the account can still be restored by Prowise during this six month period.

## Security

We secure our Services through technical and organisational measures. We do this to prevent data from being lost or being accessed by unauthorised parties.

Examples of some technical measures we have taken are:

- we make use of secure connections (e.g. TLS/HTTPS/SSL)
- data is encrypted during transmission
- we have implemented several security techniques that protect your data from the inside and out.

Some examples of organisational measures we have taken:

- set up and implemented an internal policy.
- our employees can only access the personal data in so far necessary to perform their work.
- we regularly examine our security, for example by conducting investigations into internal vulnerabilities and reviewing the best practices (for example, OWASP and the NCSC guidelines) in the field of security.

In addition, we 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.

## What are your privacy rights?

If you use our Services as Professional User you can exercise your rights by contacting your Organisation. We then assist your Organisation in fulfilling your privacy rights as described below.

Where Prowise is the Data Controller you have the following rights:

- Right of access (Article 15 GDPR)
- Right to rectification (Article 16 GDPR)
- Right to object (Article 21 GDPR)
- Right to be forgotten (Article 17 GDPR)
- Right to restriction of processing (Article 18 GDPR)

- Right to data portability (Article 20 GDPR)

If processing of your personal data is based upon your consent as referred to in the GDPR you have the right to withdraw your consent at any time for future processing.

## 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 as we process personal data based on our legitimate interest or the legitimate interest of a third party, you have a right to object. 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.

## Right to complaint

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 directly. Therefore please contact us if you have a complaint. If you are not content with the settlement of your request or complaint, you can file a complaint with the competent Data Protection Authority. You can also lodge a complaint at the Dutch Data Protection Authority (Dutch DPA) which serves as our lead Supervisory Authority. For this we refer you to the [website of the Dutch DPA](#) which is only available in Dutch.

## 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 consult this privacy statement regularly so that you are aware of these amendments.

This statement was last amended on 26 April 2022