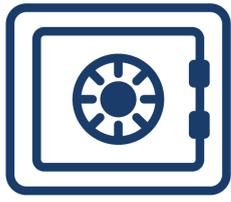


Prowise Screen Control Privacy Statement

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 and to whom does this privacy statement apply?

This privacy statement applies when Prowise Screen Control is used. With Prowise Screen Control you can manage all your Prowise Touchscreens remotely.

You need a Prowise Admin Account in order to use Prowise Screen Control. You can access this account via our Account Portal. All Prowise Accounts are subject to our Prowise Cloud Platform privacy statement, which you can find here. This Prowise Screen Control privacy statement pertains exclusively to the use of Prowise Screen Control and the processing of personal data in that context.

This privacy statement can be consulted at all times in the online Prowise Screen Control Dashboard (admin.prowise.com) and will also be made available in the Central environment on the Prowise Touchscreens ("**Privacy Statement**").



What is Prowise?

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

Where this statement refers to “**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 Privacy Officer via the address above or through privacy@prowise.com.

Which personal data do we process?

We collect personal data you share with us yourself and information we obtain automatically by using Prowise Screen Control via the online Prowise Screen Control Dashboard or external devices when these are registered for Screen Control, such as Central Devices (Prowise Touchscreens) and Windows Devices (for example laptops of students).

Below, we explain which categories of data we process.

Category	Data
Logfiles - technical data	<ul style="list-style-type: none">• Device information (model, type, software version, serial number, screen name (optional) Central Devices (Prowise Touchscreens))• Type and version of browser used• IP address
User settings and actions	<ul style="list-style-type: none">• Display, language, image, sound and localisation settings of the online Prowise Screen Control Dashboard• Session and login data (when a device last connected to Screen Control)

	<ul style="list-style-type: none"> ● Roles assigned to a user of the online Prowise Screen Control Dashboard with a corresponding set of rights (this can be at the level of Organisation, Group or Device) ● The groups created by a user within Screen Control, including optional description ● Settings that are installed or adjusted centrally from Screen Control for the registered devices within your environment, such as: <ul style="list-style-type: none"> ○ General settings (maximum volume, screen brightness and contrast) ○ System updates ○ Safety settings ○ Theme (screen background) ○ Connectivity settings (NFC) ○ Screen casting (streaming protocols and security) ○ Central apps ○ Power management (planned switching on and off)
Diagnostic and user data	<p>Data and statistics that are shown in the online Prowise Screen Control Dashboard and are made up of the above-mentioned, such as:</p> <ul style="list-style-type: none"> ● The number of registered Devices per Organisation and per Group ● Set/created Groups within the Organisation ● Access control data by means of which access to the online Prowise Screen Control Dashboard is controlled

Why do we process your personal data?

Prowise processes your 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

More specifically, the aforementioned data is processed for one of the commercial objectives below:

- to allow you, as a Professional User, to manage all your Prowise Touchscreens in Prowise Screen Control
- to manage Prowise Screen Control (system administration, management and maintenance, including detecting and fixing any vulnerabilities and resolving specific problems)
- to prevent abuse or improper use of Prowise Screen Control
- the further development and improvement of Prowise Screen Control and the user experience

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 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 may be made include:

Hosting providers and e-mail providers

IT and Security Service providers

Financial services 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.

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 Prowise Screen Control by taking 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 use secured connections (such as TLS/HTTPS/SSL)
- data is encrypted during transmission
- we have implemented several security techniques that protect your data from internal and external attacks.

Some examples of organisational measures we have taken:

- we have set up and implemented an internal policy.
- our employees can only access the personal data if they are required to do so to perform their work.
- we review our security on a regular basis, 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.

How long do we keep your data?

Organisations (customers/clients) are responsible for your personal data when they can be construed as controller, including keeping these data. This is the case, for example, for the title of the Groups and the description thereof.

If Prowise is the controller, your personal data will be kept as long as necessary to achieve the purposes as explained in this privacy statement or as long as required by contract or by law.

What are your privacy rights?

Based on the privacy legislation, you are entitled to exercise 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)

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.

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 **Error! Hyperlink reference not valid.**

No automated decisions are taken through our website.

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.

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 23 May 2022.