

Privacy Statement Prowise Learn

Prowise UK Limited (hereinafter: '**Prowise**') offers the digital learning tool Prowise LEarn which enables adaptive learning (hereinafter: '**PL**'). At Prowise, we feel it is very important to protect the privacy of our subscribers and users.

In this privacy statement we intend to explain which types of personal data are processed by Prowise when you buy and/or use PL and for what purposes. The various commitments undertaken by Prowise to protect and secure personal data can also be found here.

1. Which types of personal data are being processed and why?

When you subscribe to PL and when you use PL, the following personal data will be processed.

Contact details and payment details

In order to acquire or subscribe to PL, you are requested to provide contact details (such as your name, address, place of residence, email address) and payment details (such as a bank account number). We need those details in order to carry out the agreement, offer customer support and notify you of any changes to our subscriptions or products.

Login details

Login details, such as a user name and password, are used to protect PL and the personal data incorporated in them. Users must choose their own password, which should be difficult to guess and sufficient in length (preferably 12 characters or longer). In addition, other data can be used for the purpose of identification, authentication and authorisation of entitled users.

User data

The data provided when using PL are processed in order to save settings, calculate learning achievements and improve PL and their alignment with (the level of) the user, with the aim of enabling adaptive learning. If students use PL from within the school environment, data regarding the school and the class may also be processed.

Anonymous data for academic research purposes

User data can be used and made available to (external) researchers in fully anonymised form (in other words, the data cannot be traced to individuals) in order to be used in academic research related to education and optimal learning methods.



Data on user computer systems

Visitor IP addresses are being collected in order to process user statistics and prevent misuse (for instance by overloading the network, gaining unauthorised access or attempting to do so). In addition, certain data on user computer systems (such as the type of operating system and web browser) can be identified to ensure a quick solution to any technical problems.

The aforementioned personal data will only be used for its stated purposes and to ensure compliance with any applicable legal requirement.

2. What are cookies and why are they being used?

Cookies are small pieces of data sent from a website and stored on the user's device such as a PC, tablet or smartphone, by the user's web browser while the user is browsing.

Cookies and comparable technologies can be used to enable website functionalities of PL that Prowise offers. This includes storing preferences or login status, so that users do not need to enter this information manually time and again. Furthermore, cookies and comparable technologies can be used to analyse the general use of, and improve, the websites and PL.

3. Will personal data be provided to third parties?

Prowise will not make any personal data processed during the use of PL available to third parties, unless:

- this is necessary for carrying out the order;
- the subscriber grants written permission;
- Prowise has a legitimate interest; or
- Prowise is under a legal requirement to provide the data.

Prowise uses professional suppliers to guarantee optimal quality, availability and security of PL. Prowise has entered into contractual arrangements with all of its suppliers who process personal data, so as to guarantee that the data will not be processed for any other purposes than specified in this privacy statement and that it will be protected against loss and unlawful processing.

4. How is personal data being protected?

Prowise and all its suppliers take appropriate security measures to protect personal data against loss and unlawful processing. These measures include the following:

- PL is protected using encryption technology (SSL/TLS) for secure data exchange.
- Daily backups are made to prevent data loss.
- An authorisation policy is in place to ensure that employees only have access to personal data in so far as this is necessary for the purposes of their work.

5. How long will personal data be retained

In general, Prowise does not store your data any longer than necessary for the purposes for which Prowise has collected your data. Prowise will then remove or anonymize this data, unless Prowise needs certain data for another purpose for a longer period of time. In that case, Prowise will ensure that the relevant data is only accessible for that other purpose.

6. What rights do I have with regard to my personal data?

Right of access

You have the right to access the data that we have about you. As a subscriber or user, you can consult via your account at any time which personal data Prowise processes.

Right to rectification

You have the right to rectify your personal data (or have it rectified) if it is incorrect or outdated and / or to supplement it (or have it completed) if it is incomplete. As a subscriber or user you can correct or supplement your data at any time via your account.

Right to object

You have the right to object to the processing of your data if you do not agree with the way in which we process your personal data. This right applies to the data that Prowise uses for direct marketing such as sending email newsletters. In addition, this right also applies to other data that we use about you based on the legitimate interest of Prowise.

Right to data portability

You have the right to receive data that you have provided to Prowise in the context of the agreement (s) that you have concluded with Prowise in a machine-readable format, so that you can save this data in a database of yourself or from another party. This concerns your account details.

Right to restriction

You have the right to request a restriction on the processing of your data. This means that Prowise may store your data but not use it. You have this right in a number of cases. If you believe that this is the case, you can contact Prowise.

Right to be forgotten / request to delete account

You have the right to request Prowise to remove all data that we have from you. When you submit a request to delete your account, we will delete data that can be traced back to you except for the data that Prowise must or may retain based on the law.

Right to make a complaint

You have the right to submit a complaint about the way in which Prowise processes your data. If you have a complaint, we prefer to resolve it ourselves with you. Please contact us for this. Should you nevertheless not be able to work with us, you have the right to address your complaint to the Information Commissioner's Office (ICO).

7. Updates to this privacy statement

This privacy statement may be updated periodically. Any changes will be published on the website.

8. Contact details

If you have any further questions or comments about this privacy statement, please contact us via:

Privacy Officer:	Mr L. Loeff
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