

PRIVACY POLICY

This Privacy Policy describes our policies on the collection, use and disclosure of your information in connection with your use of our websites, emails, and mobile applications (“Site” or “Sites”). When used herein, the terms “we”, “us” and “our” refer to our company WEBSCHOOL SL and the members of WEBSCHOOL SL. For the purposes of data protection legislation, we are a data processor and controller for the information we hold about you in providing our Site.

By visiting this or another WEBSCHOOL SL website displaying this Privacy Policy or a link thereto (a “Website”, or collectively the “Websites”), or by otherwise interacting with us, you agree to accept the practices described in this Privacy Policy. This Privacy Policy is further subject to our Terms of Services related to our services you utilize and/or purchase.

When this Privacy Policy uses the term “personal data,” we mean any Data that relates to an identifiable individual, including their name, address, online identifiers, payment details or email address. The specific data we collect is described in this policy.

We encourage you to read the entire Privacy Policy, which consists of the sections listed below:

- Information We Collect
- How We Use Your Personal Data
- How Long We Keep Your Personal Data
- Who We Share Your Personal Data With
- Where We Transfer Your Personal Data
- How We Keep Your Personal Data Safe
- Your Rights In Relation To Your Personal Data
- Links To Or From Other Websites
- Partner Sites
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Information We Collect

Contact information. We collect and retain personal contact information that you submit to us voluntarily in signing up to our customers' products and services. This may include your name, mailing address, telephone number, e-mail address, gender and age. Additionally, we collect contact information provided to us during any correspondence relating to customer support, as well as in connection with products and services offered on our Sites.

Information on your use of the Site. We collect information about the device with which your use of the Sites and information on your use of the Site itself, such as the domain name, Internet Service Provider, browser type and version, pages viewed, information accessed, and the Internet Protocol (IP) address you use to connect to the Internet.

Demographic Information. We may also collect and store demographic information (such as your time zone, interface language), and use this data to tailor your experience on our Websites.

How We Use Your Personal Data

To perform our contracts with our customers. We use this information to perform our contracts with our customers and fulfil their requests, such as:

- Sending you requested service information;
- Fulfilling your order;
- Billing for services;
- Responding to customer service requests, questions and concerns; and
- Administering your account.

To contact you. We will use the personal data you give to us to contact you from time to time. Note that you may not opt-out of the communications, which are transactional and not promotional in nature. If you do not wish to receive them, you have the option to cancel your services.

To protect our Site and our business. We monitor use of the Sites and we use the information we collect, including personal data, to pursue our legitimate interest in protecting you, others and the Site itself by:

- identifying fraudulent activities and transactions;
- preventing abuse of the Sites and investigating and/or seeking prosecution for any potential threats to or misuse of the Sites;
- ensuring compliance with the applicable terms of service and this Privacy Policy;
- investigating violations of or enforcing these agreements; and
- otherwise protecting the rights and our property, its partners, and customers.

To improve our services. In order to pursue our legitimate interest in improving our Sites, we also use data to conduct research and analysis and to identify what services our customers need.

Whenever we process data for these purposes we will ensure that we always keep your personal data rights in high regard and take account of these rights.

How Long We Keep Your Personal Data

We keep information only for as long as we need it to provide you services, manage our business or as required by law or contract. Where you have a contract with us or our customers, we will retain your data for the length of the contract and will further retain that information for a time period consistent with our or our customers legal and regulatory responsibilities, after you terminate all your services with us to resolve disputes, enforce relevant Terms of Service, and to adhere to the technical and legal requirements and constraints related to the security, integrity and operation of the Sites. If you have any questions about how long we will keep your specific data, please contact privacy@webschool.org.

Who We Share Your Personal Data With

We provide your personal data to companies that help us with our business activities (e.g. assisting us in Site operations, providing customer service, etc.) or that assist us in improving our products, content and services. These companies are authorized to use your personal data only as necessary to provide these services.

We will also share your personal data:

- As required by law, court order or other government or law enforcement authority or regulatory agency in order to enforce or apply our customers' terms of services or other agreements.
- When we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud or respond to a government request. This includes exchanging information with law enforcement, other companies and organizations for fraud protection.
- In connection with a corporate change including a merger, acquisition, transfer or sale of assets or in connection to insolvency, bankruptcy or receivership. Information about our users, including customer information, will also need to be disclosed to our legal and financial advisors, investors or potential buyer in some commercial transactions seeking financing, investment or support or funding.
- To any other third party where we have your prior informed consent to do so.
- To other entities belonging to us (i.e. any companies directly or indirectly controlled by us).

Where We Transfer Your Personal Data

Our Sites are operated in the European Union.

The GDPR (2016/679 General Data Protection Regulation) is a legislation designed to strengthen and unify data protection laws for all individuals within the European Union.

WEBSCHOOL SL is fully committed to achieving and upholding ongoing compliance with GDPR.

As a data controller, we commit to:

- Limiting the data collected to what is strictly necessary: as part of this approach, when you order a service, you provide only the data required by us for billing or support purposes, or to make sure we meet our own legal obligations on data conservation.
- Only using the data it collects for the purpose for which it was collected.
- Conserving personal data for a limited and proportionate time.

- Not transferring this data to third parties other than companies associated with WEBSCHOOL SL and acting as part of the performance of the contract.
- Implementing appropriate technical and organizational measures to ensure a high degree of security.

As a data processor, we commit to:

- Processing personal data solely for the purposes of carrying out the services correctly: WE WILL NEVER PROCESS YOUR INFORMATION FOR ANY OTHER PURPOSES (marketing, etc.).
- Keeping your data inside the EU and only in countries recognized by the European Union as offering a sufficient degree of protection.
- Informing you if we have enlisted a subcontractor to process your personal data.
- Applying strict security standards to provide a high level of security for our customers.
- Reporting any data breach to the supervisory authority without "undue delay".
- Providing you with adequate documentation of our services.

How We Keep Your Personal Data Safe

We work to protect the security of your information during transmission by using Secure Sockets Layer ("SSL") software, which encrypts the information you input on the Site. However, no method of transmission over the Internet or method of electronic storage is completely secure and we cannot guarantee its absolute security. You can further help to ensure your security by taking a few simple precautions. For instance, it is important to protect against unauthorized access to your computer and to any usernames and passwords, and to be sure to sign off when you are finished using a shared computer.

Your Rights In Relation To Your Personal Data

You will be entitled to ask us:

- For access to a copy of your personal data
- To correct, erase or restrict our processing of your personal data
- To transfer the information you have provided under contract or consent to another organization
- To stop processing your information, by withdrawing your consent or objecting to our legitimate interests.

Your rights in relation to your personal data are limited in some situations. For example, if we have a legal requirement or a compelling legitimate ground we may continue to process your information. We will provide you with information on whether there are limits or exemptions that apply to any request that you make.

In the first instance you can view or change the information you have provided us with by submitting a request or logging in to your online account manager, if applicable.

Please note, however, that no information will be provided over the phone, and in no event will such information be provided without verification. You also have the right to make a complaint if you feel your personal data has been mishandled. We encourage you to come to us in the first instance but, to the extent that this right applies to you, you are entitled to complain directly to

the relevant supervisory authority. This can be the supervisory authority where you reside or work, or where you believe a breach has taken place.

[Links To Or From Other Websites](#)

We have no control over and is not responsible for the privacy policies or information gathering practices of other websites, including those to which we may link and those which may link to us. We recommend that you review privacy policies of every online service you use before submitting any personal data and direct any concerns to the site administrator of that website.

[Partner Sites](#)

We sometimes enter into agreements in which we jointly develop or operate websites with third parties (each a "Partner Site"). Any information collected via a Partner Site may be jointly owned by us and the applicable third party partner, or, alternatively, owned solely by us or the third party partner. In such event we will make sure you know who is collecting your data when it is collected as well as which privacy policy applies.

[Children](#)

You must be at least eighteen years old to register online or use our products or services. We do not knowingly collect information from children under the age of eighteen.

[Changes To This Policy](#)

We may amend this Privacy Policy at any time and will communicate changes to this Policy via posting a notice on our Site.

[Contacting Us](#)

If you have questions or concerns regarding this Privacy Policy, you can contact us by writing to us at privacy@webschool.org or by mail at Caputxins, 1 – 08800 Vilanova I la Geltrú – Barcelona – Spain , Attention: Privacy Team