

# Privacy policy

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## 1. Acceptance

The purpose of this Privacy Policy (“Privacy policy”, “This Document”) is to describe the policy of storing, using and collecting Learning Data and Personal Information and other information in Almerin Ltd’s service called YipTree (“YipTree”, “Software”, “YipTree Service”) by Almerin Ltd. (“Almerin Ltd.”, “The Company”,) In case the User of the service is not the subscriber of the service and the subscriber is an organization, municipality, community, school or institution, the subscriber as a Controller is responsible for the personal data. In such a situation, Almerin Ltd. is only a Processor of the data. Depending on the situation, the processing of Personal Data is based on consent, customer relationship, or a legitimate interest.

## 2. Definitions

The terms used in This Document are described below:

“YipTree” shall mean learning environment developed and hosted by Almerin Ltd. YipTree personalizes learning according to Users’ personal needs. To be able to personalize learning YipTree must collect and analyse Users’ Learning Data.

“Almerin Ltd.” shall mean the company who develops and maintains YipTree. Almerin Ltd. also sells YipTree in some certain countries.

“Personal Data” shall mean all the information that can be related to an identifiable person. Personal Data also includes all the information that is called Personal Information or Learning Data in this document.

“Personal Information” shall mean all the information required when registering a new User. Personal Information is used to identify individual Users from each other and to connect Learning Data to the right User. Personal Information is part of Personal data.

“Learning Data” shall mean all the data collected automatically about Users’ behave, learning results and actions in YipTree. Learning Data is used to personalize learning. Learning Data is part of Personal data.

“Organization” shall mean any school, company or other Organization, who has registered Users in YipTree.

“User Type” shall mean one of the collected Personal Information that defines which rights are granted to the User. There are two different kind of User Types; Teacher User and Student User.

“Teacher User” shall mean the User who owns maintain rights of some courses and who is educational authority for students. Teacher User has more extended rights than the Student User. Teacher User’s rights are described in This Document.

“Student User” shall mean the User whose main purpose in YipTree is to learn and whose learning is guided by the Teacher User.

“User” shall mean all kind of Users in YipTree regardless of the User Type.

“Controller” shall mean a party who determines the purpose of processing personal data.

“Processor” shall mean a party who processes Personal Data on behalf of The Controller.

### 3. Information and data collected

Almerin ltd. only collects data and information that are necessary to produce and offer the best possible user experience in YipTree. Depending on the customer relationship, Almerin ltd is either a controller or a processor. Almerin ltd. makes an agreement on the use of the service with Organizations thus Almerin ltd. can receive and process Personal Information and Learning Data in order to offer the service purchased by Organization to students and teachers. In case Almerin ltd is a controller and the user is under 16 years old, Almerin ltd collects approvals from user’s official guardians to register the user and to collect information about him or her.

Almerin ltd. receives Personal Information about User every time a new User is registered in YipTree. Personal Information may include email, first name, last name, organization, group, parents’ contact information and User Type. Almerin also receives data about the Organizations that are registered. Information of Organizations consists of the permanent location of the Organisation and the primary language of use. That information will be connected to the Users registered under the certain institution.

YipTree personalizes learning. In order to personalize learning YipTree may automatically collect Learning Data of the User activity when User uses YipTree. Such activity means User’s behave in YipTree, interaction with other Users and learning results. User’s behave includes for example, but not limited, the following, the content studied, study time and skill level. The gathered Learning Data is used to offer learning analytics, learning recommendations

and personalized tutoring for Users. The gathered Learning Data about the User activity will be also used to provide and display learning analytics to the Student User, Teacher User and to calculate the average of the group and to provide and display the average to other Users in the same group. Learning Data is generated automatically every time User uses YipTree. YipTree includes profiling based on personal information. Profiling in YipTree means automated processing of data and automated analysis of learning data and personal data to evaluate certain things in individuals and to draw conclusions and suggestions.

When User uses YipTree, Almerin Ltd. may also collect information about the following: Internet protocol address, information about the operating system and device used, name of internet service provider and information about the browser used to access YipTree. Any of the information listed above, is not connected or combined to Personal Information or Learning Data of the User. Almerin Ltd. may also use cookies to identify devices. Cookies do not use, process, combine or collect any Personal Information. Many browsers include managing options for cookies, but Almerin Ltd. wants to remind all the Users that using YipTree is not possible if cookies are completely disabled. The use of YipTree bases on cookies.

YipTree also uses links to other websites and third-party service providers to create the user experience in YipTree. For example, Youtube videos can be shown in the library and added the wall or lessons. In addition, we may partner with third-party service providers to have certain features in YipTree. Almerin Ltd. notifies that also such third-party service providers may collect information by cookies.

#### 4. The use of information and data

Almerin Ltd. processes personal information and learning data only for the purposes written in this document. In a position where Almerin Ltd. is a processor on behalf of a controller, Almerin Ltd processes all the information and data solely for purposes agreed with the controller. The use of Personal Information and Learning Data is restricted to providing the best possible learning experience. Only registered Users in YipTree may see the interaction in YipTree. The collected Learning Data enables personalized learning, intelligent tutoring, recommendations and learning gap notifications. Learning Data of Student Users can be viewed by the Student User himself or herself and the Teacher User who has the maintain rights at the certain course. If desired, Student User can join the leaderboard and thus share some of his or her Learning Data insights with other Student Users. Learning Data is displayed to the teacher to enable better guidance of Student Users, grading, personalized learning, support and other educational purposes which enable better and more holistic learning experience. The person who uses YipTree with maintain rights, assures to use the Personal Information and Learning Data only for educational and pedagogical purposes. In case, Student Users are minor according to the law, also legal guardians of the Student User may have access to Student User's Learning Data and Personal Information.

If YipTree will be integrated with third party service, software or system used by the customer Organization, the data and information transfer between these two services may be possible and the transfer may only be implemented if certain customer Organization requests. Purpose of data transfer between third party service, systems or software is always and only to improve and facilitate learning and management of learning. If the data transfer will be implemented all the Users who are affected by that, will be informed. However, Personal Information or

Learning Data will never be sold or disclosed to third parties. Also, the Learning Data will never be transferred to third parties without permission of the Organization.

The only exception when forwarding Personal Information or Learning Data is a necessity to third parties, is a situation where Almerin Ltd. is under a legal obligation to disclose information to public authority or a similar party.

Almerin Ltd. stores personal information only for necessary and legitimate time period. The storage period depends on the customer relationship, the information and the purpose of the use which means that the maximum storage time varies. All information will be deleted during a reasonable time after the end of customer relationship.

## 5. User's rights

Every registered User has various rights related to the process of Personal data. With a written request the data subject i.e. User is able to ban direct marketing, access the data collected of him- or herself, correct inaccurate, incomplete, unnecessary or expired information in the register or prohibit the process of Personal Data considered him- or herself. A registered YipTree Student User is able to access User's own Learning Data in YipTree at any time. A registered YipTree Teacher User is able to access Learning Data of the Student Users who are connected to Teacher User's course in YipTree. All the generated and collected Learning Data is displayed in progress tool within the YipTree user interface. All Users may delete their account by written and signed request to Almerin Ltd. All actions mentioned above are free of charge and will be implemented after the data subject i.e. User has contacted the responsible contact person of the register. Responsible contact person of register can be found in the document called Register Description. All the Users will be deleted permanently if the organisation to which certain Users belong is deleted. In case, User belongs to several Organizations, deleting one Organization does not yet delete the User. Almerin Ltd. notifies that when a User is permanently deleted, User's Learning Data will be permanently gone, and it cannot be restored. Every registered User has the right to appeal to the Data Protection Officer if any doubts about possible violations of the current Data Protection Act occur.

## 6. Security and protection

YipTree is built with high quality standards and security and privacy are essential parts of the design. Almerin uses several administrative and technical methods to protect all Users' Learning Data, Personal Information and privacy. As major of YipTree's end customers are children under 16 years of age Personal Data is processes with special care and protection.

Only artificial intelligence monitors Users' Learning Data, so it won't be accessed by people, except Teacher User in YipTree user interface. YipTree uses xAPI standard to store Users' Learning Data. When an activity needs to be recorded, YipTree sends secure statements in the form of "Noun, verb, object" or "I did this" to Almerin's Learning Record Store (LRS.) Learning Record Store is a centralized and secure repository where all learning information is located and can be accessed with any other compliant learning tool or platform.

Almerin does not hand over Personal Information to any 3rd party without User's permission. If User wants to use YipTree's external integrated services or untrusted integrated tools, games or web services, then User makes agreement with third party for data harvesting. Third parties will not have right for any Personal Information about a User without User's specific permission.

When hosting YipTree and storing Data and Information, Almerin co-operates only with third parties who have advanced privacy policies. All data remains inside EU and no other country, state or institution can have physical access to it. In the merger or acquisition of a company, the Privacy Policy shall remain in force and such an event is deemed to follow the Privacy Policy.

## 7. Updates and changes

Almerin may update and change the Privacy Policies in order to provide even more advanced Privacy Policies. Almerin always updates the newest version of Privacy Policy to YipTree. Almerin does not notify or inform Users about the possible changes in Privacy Policy. Almerin highly recommends Users to read through the Privacy Policy regularly so that he or she is kept up-to-date with changes and updates.