

Privacy Statement of Edufax Distance Learning

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Edufax provides education services to employers and expat families within the context of international relocation. This page contains the privacy statement of Edufax B.V. ('Edufax') that specifically covers the distance learning provided by Edufax. You can consult the relevant privacy statements for our other forms of service elsewhere on this website.

This privacy statement provides information about the data that Edufax processes of employers and their contact persons, expat families and users of the website(s) www.edufax.nl and www.edufaxonline.nl to provide distance learning.

As this privacy statement is subject to change, we recommend that you consult it often. This privacy statement was last amended on 1 November 2018.

1 Who is responsible for processing your personal data?

If you use Edufax's distance learning for remote Dutch lessons, we process the data you provide to us. Edufax is the controller for processing your personal data under the General Data Protection Regulation ('GDPR'). This means that Edufax is responsible for what happens to your data.

We realise that we are processing your and your children's special and other personal data. We therefore consider it our responsibility to treat your data with the utmost care and confidentiality.

You can contact us at any time if you have questions about this privacy policy. Our details are:

Edufax B.V.
Valkenswaardseweg 3a
5595 CA Leende
Telephone +31 (0) 402047470
E-mail info@edufax.nl

We are also on the following social media channels:

YouTube	https://www.youtube.com/user/EdufaxNL
Twitter	https://twitter.com/edufaxnl?lang=nl
Facebook	https://www.facebook.com/EdufaxNL/
LinkedIn	https://www.linkedin.com/company/edufax

2 Which data are collected and why?

If you wish to use Edufax's services, we need several personal data of you and your children (and from you as employer, or contact person of the employer, if applicable). We collect and process these data for various reasons, including performing our services, bringing our services to your attention and keeping you informed about them.

Before a child can start Edufax distance learning (NTC-online), we request specific special and other personal data from you that we retain. These include name and address details, educational data and any medical data, if applicable. We

need these data to determine which curriculum best fits a child's current level of proficiency and to administratively process the enrolment.

During the school year, the student uploads homework to our electronic learning environments (ELEs) and/or online systems. Edufax has made arrangements with these suppliers regarding the processing of personal data in the form of processing agreements. The teacher provides feedback on the work uploaded to these electronic learning environments. This homework and the feedback are saved within this online system, so students and teachers can revisit it at a later stage.

The teacher also keeps in touch with the student and parents by e-mail, telephone, Skype and WhatsApp. This correspondence or conversation report is saved in our CRM system. If you send us a message or have asked us a question, we also save the subject and content of this message.

Children's results are retained to monitor their progress. Assignment results are saved in the electronic learning environment and in our registration system and you can view them in the electronic learning environment. The reports issued three times a year and the results of the method-independent tests are sent to you (by e-mail) and saved separately.

Edufax may wish to use photographs/short videos of your child for commercial marketing purposes. We do this only if you have given your prior consent. You can withdraw your consent at any time by sending an e-mail to info@edufax.nl.

3 What is the legal basis for using my data?

a) Data processing is necessary to perform the agreement between you and Edufax

We process most of your personal data because processing these data is necessary to perform your agreement with Edufax. These personal data are then necessary, for example, to determine the correct teaching programme or to give your child online access to it.

b) Data processing is necessary for Edufax to comply with its statutory obligation

Edufax supports employers and expat families with educational issues. There are several laws that Edufax must observe. These regulations require us to process certain personal data about you. For this reason, we may also be obliged to provide your data to third parties.

c) Data processing is necessary to look after Edufax's legitimate interests.

We want to offer you the best possible service. To do this, we process your personal data. This is the case, for example, when sending e-mails and the newsletter, creating an account, visiting our website and promoting our social media channels. We always consider your privacy interests and your data will be stored as anonymously as possible.

d) *You have explicitly consented to the data processing*

For all other matters, we will use your data only with your consent. This is the case, for example, when we want to share a photograph/short video/submitted work of your child on social media etc. As stated earlier, you can withdraw your consent at any time by sending an e-mail to info@edufax.nl.

4 How are my data secured?

Your privacy is of paramount importance to us and we ensure that your data are treated confidentially and with the utmost care. We have therefore adopted appropriate technical and organisational security measures against the loss, theft or otherwise unlawful processing of these data. For example, we ensure that only the necessary persons have access to your data, that access to the data is restricted, and that our security measures are regularly checked. We also encrypt e-mails and other messages containing special and other personal data.

5 How long will my data be retained?

We do not retain your data longer than necessary to achieve the purposes stated in this privacy statement or if we must comply with statutory retention periods. For the retention period of data collected via cookies, please refer to the cookie statement.

After the retention period expires, we delete all data that can be traced back to you. Anonymised data may be stored for longer.

6 With whom will my data be shared?

We will not provide your data to third parties without your prior consent, unless this is necessary to perform the agreement or if we are required to do so by law.

We may also forward your data to the following organisations that process these data on our instructions:

- Employer (if the employer pays the invoice directly): we ask for consent for enrolment or notify the employer which teaching programme is being followed, we substantiate costs that are higher than a regular programme (special personal data are not shared), and notify the employer if a student deregisters/has not submitted work for an extended period;
- Suppliers of ELEs, digital tests and external learning materials: to give a student access to the digital learning material, we share certain personal data with external organisations. This never includes special personal data, only the name, class/school year, date of birth and e-mail address;
- School: for students who follow the IB exam programme for Dutch A through us, feedback on the results obtained and progress of the student is given to the coordinator of the day school, so the day school knows how the student is progressing in that exam subject. For other students, results/progress are shared with the current or future day school only if the student's parents explicitly request this and they consent to us sharing this information with the school;
- External ICT suppliers: we have made written arrangements with these organisations about handling your personal data and what they may and may not do with these data.

7 What rights do I have regarding data processing?

As the data subject of the data processing, you have various rights under the GDPR. These are:

Access to, rectification and removal of your data

You may request access to the data Edufax processes about you at any time (free of charge) and have them rectified or removed by sending a request to info@edufax.nl. To verify your identity, Edufax may ask you to include a copy of your identity document, in which your citizen service number (BSN) and passport photograph have been obscured. Note: your BSN can appear in several places on your identity document. Following this request for access, you may request Edufax to rectify or remove your personal data.

Complaint to the Dutch Data Protection Authority

In the unlikely event that you believe that we are not handling your personal data with care, you can contact us using the contact details above. You may also submit a complaint to the Dutch Data Protection Authority (*Autoriteit Persoonsgegevens*).

Objection to the processing of your personal data

You may object to the processing of your personal data by Edufax if your personal data are used for purposes other than those necessary to perform an agreement or comply with a statutory obligation. For example, you may object to the use of your personal data for marketing activities by e-mail. You can do this by sending an e-mail to info@edufax.nl.

Should you object to the processing of your personal data when this is necessary for us to perform our work, we must point out that it will not be possible to provide our services to you without your personal data.

Right to data portability

You also have the right to data portability. This is the right to obtain personal data about you that you have provided to Edufax in a clear format. For this purpose, too, you can send an e-mail to info@edufax.nl.

8 Who can I contact with other questions?

If you have further questions and/or comments after reading this privacy statement, contact us using the contact details above.