

PRIVACY POLICY FOR TEACHIQ AB

1. IN GENERAL

The Swedish limited company Teachiq AB, registration number 556538–9409 and VAT number SE556538940901, address Granparksstigen 5, 18273 Stocksund, Sweden ("**Company**", "**we**" or "**us**"), provides the digital tool Exam.net ("**Service**") through <https://exam.net/> ("**Website**").

This document ("**Privacy Policy**") is meant to help you understand what information we collect, why we collect it and your rights. Following the General Data Protection Regulation (Regulation 2016/679), we are responsible as data controllers for the processing of personal data when we determine the purpose and means of such data. Information that directly or indirectly can be connected to an identifiable living natural person is defined herein as "**Personal data**".

Please note that if Exam.net is used through the service of an educational institution, this Privacy Policy does not apply and we ask you to contact your educational organization with your questions on how they process your Personal data as a data controller.

2. WHAT PERSONAL DATA WE PROCESS

We will process the following Personal data when you use the Service:

- a) Name (first name and/or family name);
- b) email address;
- c) school, group, class or organization;
- d) student ID
- e) subject(s);
- f) IP address; and
- g) telephone number
- h) anonymization code
- i) answers/texts connected to exams
- j) log data

The following Personal data will be collected automatically when you use the Service;

- a) Information about your use of the Service;
- b) contents that you publish, upload or create by using the Service; and
- c) technical data, including the URL you are accessing the Website from, IP address, unique device ID, information about network- and computer capacity, type of browser, language and information about identification and OS.

Please note that we cannot provide the Service to you unless you provide us with the abovementioned Personal data. The processing of your Personal data is necessary for us to provide the Service to you and to maintain our contractual relation.

3. FOR WHAT REASON WE PROCESS PERSONAL DATA

We process your Personal data for the following purposes:

- a) To administer your account, provide and make the Service accessible and personalized to you and to improve your user experience and to further make sure we deliver on our obligations to you as a user;
- b) to send you notices and messages through email or in other ways;
- c) to inform you on updates of the Service, the Privacy policy or other contractual agreements;
- d) to improve and develop the Service or new services, and to analyze your use of the Service;
- e) Maintain security in the technical functions of the Service and prevent misuse of the Service;
- f) to fulfill any contractual agreements, including protecting our rights, our property and security; and
- g) to fulfil requirements in mandatory applicable law.

4. LEGAL GROUNDS

We process Personal data based on the following legal grounds:

- 1) Fulfilment of contract. We process your Personal data to provide you with the Service in accordance with the agreement entered into between you and us, or to take necessary steps based on the requests of a user prior to entering into an agreement regarding the Service.
- 2) Legitimate Interest. The processing of your Personal data can also be based on our legitimate interest to operate, administrate, maintain and improve our Website and our Services to you, including responding to requests from you. This also includes sending information connected to our Services to you, based on our customer relation with you.

You have the right to object to the processing of Personal data based on a legitimate interest. If we receive your objection, we will inform you on the basis on which we have balanced our legitimate interest against yours as an individual.

5. DISCLOSURE OF PERSONAL DATA

Exam.net is built on a technical platform supplied by a well known company with data storage in the Netherlands, Europe.

We will not share, sell or in any other way disclose your Personal data to a third party, other than in the situations listed below:

- We may employ service providers to perform tasks on our behalf in order to provide the Service to you. Such third parties do not have any right to use your Personal data for other reasons than what is necessary to perform the tasks requested by us.

The table below describes the recipients of your Personal data and what safeguards we apply in case such recipients are located outside the EU/EEA. You can acquire further information regarding disclosures by contacting us at privacy@exam.net.

Microsoft Corp., Microsoft Azure	The Netherlands	
Google LLC	Europe (Denmark, Belgium, the Netherlands, Ireland, Finland)	

6. LEGAL REQUESTS AND PREVENTING HARM

We may be required to disclose Personal data in response to a lawful request by a public authority. We reserve the right to access, read, retain, and disclose Personal data as necessary to comply with any law or court order; to enforce or apply our terms of use and other agreements; or to protect the rights, property or safety of Exam.net, employees, users of the Service, or others.

7. COOKIES, BEACONS AND OTHER TECHNOLOGY

We collect information using technology like cookies, beacons and local storage (e.g. on your web browser or your device). For information on how we use this type of technology, please refer to our cookie policy.

8. DATA RETENTION

When you are a registered user (teacher), we retain your Personal data for 3,5 years (1275 days) counting from the date of the latest login. After that, your account and your Personal data will be deleted. Personal data may still be stored in back up files for 30 days after the deletion, whereafter it is permanently erased and cannot be re-created.

If you are a student and use Exam.net by order of your school, your Personal data is managed by your school organization. If your teacher or school organization does not delete any data beforehand, your Personal data is sent to a temporary archive in our database 180 days after an exam was created or uploaded by your teacher. Your Personal data remains archived for 3 years, and while in the archive, the data is not visible or used. After 3 years in the archive the data is deleted. Personal data may still be stored in back up files for 30 days after the deletion, whereafter it is permanently erased and cannot be re-created.

9. CHILDREN

The Services are not directed to persons under the age of thirteen (13). If you are a parent or guardian of a person under the age of thirteen (13) and you become aware of that the child has provided Personal data to us without your consent, please contact info@exam.net to exercise your access, rectification, erasure, limiting of processing and objection rights.

10. YOUR RIGHTS

The rights in this section refer to the Personal data processed by Company as data controller.

You have an absolute right to object to the processing of your personal data for direct marketing. You also have the right to withdraw your prior given consent, if applicable. The withdrawal of your consent does not affect the lawfulness of the processing based on the consent before its withdrawal, and we may continue processing your personal data based on other legal grounds, except for direct marketing.

You have the right to request access and further information concerning the processing of your personal data, or request that we correct, rectify, complete, erase or restrict the processing of your personal data. You have the right to obtain a copy of the personal data that we process relating to you free of charge once (1) every calendar year. For any additional copies requested by you, we may charge a reasonable fee based on administrative costs.

If the processing is based on the legal grounds consent or fulfilment of contract you have the right to data portability. Data portability means that you can receive the personal data that you have provided to us, in a structured, commonly used and machine-readable format, and have the right to transfer such data to another data controllers.

If your Personal data is processed by us by order of your school organization, please consult your school or school organization for advice on your personal data rights.

11. CONTACT INFORMATION

To enforce your rights as described in section 10, or if you have any questions about our Personal data processing, please contact us by sending an email to privacy@exam.net or a letter to Teachiq AB, Granparksstigen 5, 182 73 Stocksund, Sweden. To ensure quick handling of your request, please state your full name and the e-mail address that your account is connected to. Please also note that if you send your request by letter, you personally have to sign the request to receive information about your Personal data.

If you would like to make a complaint or express your concerns regarding our processing of your Personal data, please contact the applicable supervisory authority. For more information about local supervisory authorities within the EU, please go to: https://ec.europa.eu/info/law/law-topic/data-protection/reform/what-are-data-protection-authorities-dpas_en

12. CHANGE OF CONTROL

If there is a change of control in our business, we may transfer your Personal data to the new owners for them to continue to provide the Services.

13. CHANGES TO THIS PRIVACY POLICY

Teachiq AB reserves the right to, at its own discretion, make changes to this Privacy policy. If we do so, we will inform you on the Website, or by email if changes are extensive. If the changes require your consent, we will give you further notice about this in a way that is suitable under the circumstances and ask for your consent.