



PRIVACY POLICY

Mission:Education is an educational initiative of Telerik School Academy EOOD, with UIC 206130536 and its registered office and management address at 31 Aleksandar Malinov Blvd., 1729 Sofia, Bulgaria (also referred to as the Academy), ensures and safeguards the privacy of the personal data it processes with utmost care and in accordance with the highest national, EU and international standards.

When you interact with us, you may share personal information with us which helps us to identify you (e.g. name, email address, address, telephone number). This is known as “personal data”.

This Policy sets out the common privacy principles, as well as the new GDPR Standard, which requires an even higher level of compliance from the Academy.

This Policy is strictly subject to any changes that the Academy wishes to take.

CONTACT US

Telerik School Academy EOOD acts as “data controller” for the personal data it processes in the framework of this Privacy Policy.

Should you have any questions about this Policy then please contact our Compliance at compliance@telerikacademy.com or in writing to the Academy, Data Privacy Officer, 1729 Sofia, 31 Aleksandar Malinov Blvd., Bulgaria.

PERSONAL DATA

The Academy may process, inter alia, one or more types of the following personal data:

- job applicants and Academy personnel, relating to their (potential) role within the Academy including contact details, résumé, professional development, personnel file, benefits, compensation, etc.;
- The Academy employees’ family members and dependents, relating to employee benefits and services;
- students which are being trained at the Academy;
- online registered users of the platforms of the Academy;
- consumers/members of the public, some of whom also become direct customers, relating to the services we provide to them or that they ask us about;
- business associates and personnel of the Academy’s suppliers and other agents for the management of the business relationship;
- the personal data of the complainants, persons who entered in a written correspondence with the Academy or deposited with documents containing their and / or foreign personal data and of other persons who, in any case, have contacted the Academy in its capacity of a data controller, and images captured via CCTV cameras while Data Subject is within the Academy’s premises.
- Other information collected on paper or electronically for visitors in the Academy’s premises.
- Information about personal details of representatives of clients or customers.
- First name, family name, email, city, class during the relevant academic year, and the Academy program, in which the person is interested in, of the children or parents who have expressed their wish to participate in the Academy by filling out an on-line application form for participation in the Academy available on the Academy website.



- First name, surname, family name, telephone number and e-mail of a parent that exercises parental rights or a guardian of a child under 14 years old, as well as first name, surname name, last name, class, training program, photographs, images, interviews, video and study materials and educational results of children, connected to their training with the Academy, including children under the age 14 years old, who have been registered for an Academy learning program or participates in a learning program at the Academy.
- First name, family name, phone number, email, school where they work, job position (principal, deputy principal, senior teacher, teacher etc.), information including feedback forms and images for teachers and people working in educational institutions who have registered on and are using the Academy platforms or have voluntarily provided any of the forementioned data via forms available on the Academy's websites or platforms.

DATA THAT WE COLLECT WHEN YOU INTERACT WITH THE ACADEMY SITES

We use cookies and other tracking technology which collect certain kinds of information when you interact with our site. Please see our [Cookie Notice](#) for information on these technologies and your rights in relation to them.

LEGAL BASIS FOR US PROCESSING YOUR DATA

There are a number of different grounds that we are lawfully able to process your personal data under the requirements of the EU Data Protection law, as follows:

- **Legitimate interests**

The Academy may process your data where it is necessary for the purposes of the legitimate interests pursued by the Academy or by a third party, except where such interests are overridden by the interests or fundamental rights or freedoms, which require protection of personal data.

- **Consent**

In certain circumstances, we will seek to obtain your explicit consent before we undertake certain processing activities with your personal data. This means that:

- o you have to give us your consent freely, without us putting you under any type of pressure
- o you have to know what you are consenting to – so we'll make sure we give you enough information
- o you should only be asked to consent to one processing activity at a time – we therefore avoid "bundling" consents together so that you don't know exactly what you're agreeing to, and
- o you need to take positive and affirmative action in giving us your consent – we're likely to provide a tick box for you to check so that this requirement is met in a clear and unambiguous fashion.
- o You have to know that when we process personal data of a child under 14 years old on the basis of consent, we must obtain such consent for processing of the personal data by the parent of the child who possesses parental rights or by the guardian of the child appointed by law .

- **Performance of our contract**

In some cases, we will need to process your personal data in order to execute the obligations under our contract or in order to undertake the necessary steps to enter into a contract.

- **Compliance with legal obligation**



Processing of your personal data may also be needed for compliance with a legal obligation to which the Academy is subject, for example, because of a request by a tax authority or in connection with any anticipated litigation.

We do not think that any of the above activities prejudice you in any way. However, you do have the right to object to us processing your personal data in certain circumstances.

PRINCIPLES OF PROCESSING

The Academy shall process Personal Data in full observance of the following principles:

<i>Lawfulness, fairness and transparency</i>	Personal Data shall be processed lawfully, fairly and in a transparent manner in relation to the Data Subject.
<i>Purpose limitation</i>	Personal Data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
<i>Data minimization</i>	Personal Data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
<i>Accuracy</i>	Personal Data shall be accurate and, where necessary, kept up to date.
<i>Storage limitation</i>	Personal Data shall be kept in a form, which permits identification of Data Subjects for no longer than is necessary for the purposes for which the Personal Data are processed.
<i>Integrity and confidentiality</i>	Personal Data shall be processed in a manner that ensures appropriate security of the Personal Data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures.
<i>Accountability</i>	The Academy, as Data Controller shall be responsible for, and be able to demonstrate compliance with the applicable Data Protection Law.

RECORDS OF PROCESSING

The Academy shall maintain an overview of all Processing activities within the organisation (e.g. what kind of data categories are being processed, by whom (which departments or business units) and for which underlying purposes of processing (“Records for Processing”).

The Records of Processing shall explicitly state the Lawful Basis and Purpose(s) of Processing.

DATA MINIMIZATION

The Academy shall Process Personal Data only if and to the extent it is adequate, relevant and limited to what is necessary to achieving business-related purposes.

Any additional Personal Data, which reaches the Academy (either intentional or accidentally), from other source than Data Subject, is to be treated as a data privacy incident and brought to the attention



of the privacy officers.

PURPOSE LIMITATION

The Academy shall Process Personal data for the purposes for which it was originally collected (original purpose). Personal Data may be Processed for purposes different from the original purpose (secondary purpose) only if the secondary purpose is compatible and closely related with the original purpose, as understood by the Data Subject concerned.

Any change in the original Purpose of Processing will be assessed carefully and will be consulted with the responsible privacy officer, before executing any further Processing.

ACCURACY AND CONFIDENTIALITY

All Personal Data processed by the Academy must be kept accurate, complete and up-to-date as is necessary for the Purpose(s) of Processing. The personnel of the Academy shall make sure that the Personal Data obtained directly from Data Subjects or indirectly is verified against relevant documentation.

The Academy shall use appropriate technical and organizational measures to safeguard Personal Data, including when third parties are engaged in processing Personal Data on the Academy's behalf.

STORAGE LIMITATION

The Academy shall retain Personal Data in either hard-copy or electronic form (or both) only for a specific period ("Retention period"), which in any case will not be longer than:

- the time needed to accomplish the Purpose of Processing, or
- the period necessary to comply with an retention requirements under the applicable domestic legislation, or
- as advisable in light of an applicable statute of limitations.

TRANSFERS OF PERSONAL DATA

In the exercise of its activities, the Academy may transfer data with third parties only once it makes sure that data privacy and security is guaranteed appropriately.

When transferring Personal Data to a third-party country outside the EU/EEA, the Academy shall ensure that binding rules, in agreement or otherwise, require to the third party to provide adequate guarantees for the protection of Personal Data are in place.

PERSONAL DATA BREACH

All information/data breaches must be reported to the responsible privacy officer immediately as per the applicable requirements of the law.

INDIVIDUAL RIGHTS

Under Data Protection Law Data Subjects have the following Individual rights with respect to the



processing of their personal data:

RIGHT TO ACCESS	The right to access to the Personal Data processed by the Academy or by a third party vendor on behalf of the Academy.
RIGHT TO RECTIFICATION	The right to have inaccurate or incomplete Personal Data amended or erased.
RIGHT TO ERASURE	The right to have Personal Data permanently removed.
RIGHT TO RESTRICTION OF PROCESSING	The right to request that the Academy temporarily or permanently suspends Processing all or some of Personal Data of the Data Subject.
RIGHT TO DATA PORTABILITY	The right to receive their Personal Data, in a structured, commonly used, machine readable and interoperable format, giving them the ability for their Personal Data to be provided to another Data Controller by themselves or by the relevant Academy staff. Rule: Use appropriate technical and organizational measures to safeguard Personal Data, including when third parties are engaged in processing Personal Data on the Academy's behalf.
RIGHT TO OBJECT	The right to object to the processing of their Personal Data when such processing is based on a public interest or legitimate interest grounds, or is processed for the purposes of direct marketing.
AUTOMATED DECISION MAKING	The right not to be subject to a decision based solely on automated individual decision-making, including profiling, which produces a legal effect or significantly affects them.