

STUDYFLOW'S PRIVACY POLICY

Personal integrity is something we value at Studyflow. Therefore we always strive for a high level of data security when processing personal data. In this Privacy Policy, we explain how we process personal data and why. We also explain your rights and how you can exercise them. You are always welcome to contact us if you any questions regarding our processing of your personal data.

General

Words written with capital letters in this privacy policy (the “**Privacy Policy**”) have the same meaning as expressed in [the Terms of Service for Students using iOS](#) and [the Terms of Service for Teachers using iOS](#). Students and Teachers will be jointly referred to as “**Users**” in this Privacy Policy.

Studyflow processes personal data in compliance with the General Data Protection Regulation (EU) (2016/679) and this Privacy Policy. The Privacy Policy is not applicable to any information, applications or websites other than the Platform and Studyflow's [website](#).

We may update our Privacy Policy from time to time. Thus, you are advised to review this page periodically for any changes. These changes are effective immediately after they are posted on this page.

What is personal data and what is processing of it?

Everything that directly or indirectly can be used to identify a real person who is alive is considered personal data. This means that not only things like your name and personal identity number are considered personal data, but also for example things like pictures, IP address and e-mail address.

Processing of personal data is everything that happens with the personal data in the IT-systems. It includes for example the collecting, registration, structuring, storing and transferring of personal data. Things that happen outside of the IT-systems can in some cases be seen as processing, when the data goes through a filing system.

Data controller

A controller determines the purposes and means of the processing of personal data. Studyflow is the sole controller regarding most of the personal data processed. For some personal data, one of our data processors may act as a data controller independently of Studyflow. The data processors that may act as data controllers are Cansolo AB, Twilio, Inc. and Stripe, Inc. We recommend that you pay extra attention to these companies' privacy policies (links are found in the table of personal data) since their privacy policies are the ones that are effective for the personal data that they are independent data controllers of. This

means that if personal data is shared with one of these third parties, and they act as independent data controllers, Studyflow is no longer in charge of what happens to that data on their behalf, which is why you should understand how they process and use your personal data by reading their privacy policies. In the table of personal data below, you can see exactly who the data controller is of every personal data processed.

Data processors

A processor is responsible for processing personal data on behalf of the controller. It is necessary for us to use certain third parties as data processors. In the table of personal data below, you can see exactly who the data processor is of every personal data processed, and find links to their privacy policies.

Third parties

To make the table of personal data more comprehensive, we want to inform you about what third parties we employ and for what reason. We imagine knowing a bit about the different third parties will help you understand why a certain party is involved in the processing of a certain personal data when reading the table of personal data.

- i) Studyflow's backend is located at Amazon Web Services, owned by Amazon Web Services, Inc. and its affiliates, which basically means that almost everything that happens in our systems is processed in one way or another by Amazon Web Services, Inc. and its affiliates.
- ii) Auth0, Inc.'s services are used to process and manage the user accounts.
- iii) Cansolo AB is used for managing payments to the Teachers.
- iv) Stripe, Inc. and its affiliates is used as the payment solution for the Students.
- v) Twilio, Inc. is necessary for providing the video and voice chat that you have during a Class. Twilio, Inc. is also used for the sms verification.
- vi) Google LLC's Firebase services are used for various reasons, mostly for the Platform to function properly, but also for statistical purposes and crash reporting. We also use Google Plus as an option for you to create your user account with.
- vii) We use Facebook, Inc. as an option for you to create your user account with.
- viii) Zendesk, Inc.'s services are used for us to be able to provide customer support to you and others.
- ix) B-one FZ-LLC is our domain and e-mail provider. This means that e-mails sent to an address ending with @studyflow.se will be processed by B-one FZ-LLC.

Studyflow may share personal data with the police or other authorities if it concerns a crime investigation or another reason of which the law forces us to do so.

Some of your personal data will be shared with other Users on the Platform, for example your full name. In the table of personal data below, you can see exactly what personal data may be shared with other Users. A prerequisite for your use of the Platform is that you acknowledge that this personal data might be processed and/or controlled by the other Users. Studyflow is neither responsible nor liable for such personal data processed and/or controlled by another User.

When we send you e-mails containing personal data, your e-mail provider will obviously process that data. Since we do not know or determine what e-mail provider you use, we cannot take any responsibility for its processing and/or controlling of your personal data. We recommend that you read your e-mail provider's privacy policy.

Studyflow's website and the Platform may contain links to other sites. If you click on a third-party link, you will be directed to that site. Note that these external sites are not operated by us. Therefore, we strongly advise you to review the Privacy Policy of these websites. We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

What personal data is processed and why? (Table of personal data)

Instead of writing a short text with only some examples of what data we process and why, we want to provide full transparency to you. Therefore, we have made a table of every personal data processed by us, including why it's processed, how it's used, how long it's retained, how it's collected, who the data controller is, who the data processor is, where the data is stored and the security measures taken to protect the data. The table is found [here](#).

Where is the personal data processed?

We strive to always process your personal data within the EU/EEA but sometimes this is simply not possible. For certain IT-related purposes, personal data may be processed outside of the EU/EEA. This happens for example when one of our data processors, either itself or any of its sub-processors, is established or just processes data outside of the EU/EEA. As the data controller, Studyflow is responsible to take all reasonable legal, technical and organizational measures to ensure that the data processors are compliant with current regulations within the EU/EEA. In the table of personal data you can see exactly what personal data might be processed outside of the EU/EEA.

When personal data is processed outside of the EU/EEA, the security level is either granted through a decision by the European Commission that the country in question ensures an adequate security level or through the use of so called appropriate safeguards. This includes for example "Privacy Shields" and the use of "Binding Corporate Rules". If you want more information about these safeguards, you are welcome to contact us.

How long do we retain personal data?

We do not retain your personal data longer than necessary for the specific purposes stated in the table of personal data. Since most data is required for your user account to work, most personal data is retained until you contact us and request that we delete it. Some data may be retained even after you have made such request if we for example are required to do so by law. We may also retain certain data even after you have made such request if the processing of it has an overriding legitimate interest as the lawful basis. In the table of personal data you can see exactly how long each personal data is retained.

Do we process personal data concerning children?

The Platform and Studyflow's services in whole do not address anyone under the age of 13. We do not knowingly collect personal data from children under 13. In case we discover that a child under 13 has provided us with personal data, we immediately delete this from our systems. If you are a parent or guardian and you are aware that your child has provided us with personal data, please contact us so that we will be able to do the necessary actions.

What rights do you have as a User?

As a User, you have a number of rights according to the law. How you shall proceed to exercise these rights is described later on. Down below we have listed your rights.

Right of access by the data subject

If you would like to know what personal data concerning you that we are currently processing, you have the right to access this information. When you make such request, we might ask you some questions in order to make sure that your request is handled effectively. We will also take measures to ensure that the data is requested and handed to the right person.

Right to rectification

If you realize that any of your processed personal data is incorrect or incomplete, you have the right to make a request for rectification. In some cases you may be able to make the rectification yourself, which we will inform you of then.

Right to erasure ("right to be forgotten")

You may request that we delete your personal data that is being processed by us if:

- i) The personal data is no longer necessary for the purpose that we originally collected or processed it for;
- ii) We are relying on your consent as our lawful basis for holding the data, and you withdraw your consent;
- iii) We are relying on legitimate interests as our lawful basis for processing your personal data and you object to the processing and there is no overriding legitimate interest to continue this processing;
- iv) We have processed the personal data unlawfully;
- v) The personal data is about a child under the age of 13 of which you have the parental responsibility;
- vi) We have to comply with a legal obligation; or
- vii) We have processed the personal data for direct marketing purposes and you object to that.

We have the right to deny your request if there are legal obligations which prevents us from immediately deleting certain personal data. The case may also be that further processing is necessary for us to be able to establish, exercise or defend legal claims.

If we are prevented from deleting your personal data, we will block it from being used for any other purpose than that which prevents us from deleting it.

Right to restriction of processing

You have the right to request that our processing of your personal data is restricted. If you object to the correctness of the personal data processed by us, you may request a restriction of the processing during the time we need to check whether or not the personal data is correct.

If we do not longer need your personal data for the purposes stated in the table of personal data, we delete it. But if you need the personal data to establish, exercise or defend legal, you may request a restricted processing of the data. This means that you may request that we do not delete your personal data from our systems.

If you object to a legitimate interest as our lawful basis for the processing of your personal data, you may request a restricted processing of your personal data during the time we need to determine whether or not our legitimate interest overrides your interest of having the data deleted.

If the processing is restricted because of one of the reasons stated above, we may only (aside from the storing) process your personal data to establish, exercise or defend legal claims to protect someone else's rights, or if you have given us your consent.

Right to object

You always have the right to object to any processing of your personal that has a legitimate interest as the lawful basis for the processing. You also have the right to not be exposed to further direct marketing after objecting to our processing of your personal data for the purpose of direct marketing.

Right to data portability

You, as a registered User, have the right to receive an extract of the personal data concerning you, and provided by you, that either has your consent or a contract as the lawful basis for the processing of it. In addition, only personal data that is processed by automatic means will be included in such extract. Personal data that would adversely affect the rights and freedoms of others if handed to you will not be included in such extract.

You also have the right to have your personal data transmitted directly from us to another data controller, where technically feasible

Exercising your rights

You may exercise your rights by sending a request in writing to support@studyflow.se. We will respond to your request without undue delay and within 30 days. Your e-mail shall include an attached document with the following information:

- i) Type of request:
 - a. Request for an extract;
 - b. Request for erasure ("request to be forgotten");
 - c. Request for rectification;

d. Request for restricted processing;

If you make a request for erasure, rectification or restricted processing, you need to specify what personal data you would like to be deleted, rectified or have restricted processing of.

- ii) Which category or categories you best fall into:
- a. Former Student;
 - b. Current Student;
 - c. Former Teacher;
 - d. Current Teacher;
 - e. Consultant to Studyflow;
 - f. Employee at one of Studyflow's service providers;
 - g. Person who applied to be a Teacher but did not become one; or
 - h. Other.

If you are an employee at one of Studyflow's service providers, you need to specify which one. If you chose "Other", please specify who you are.

- iii) Your full name, date, city and signature.

How is your personal data protected?

We value your trust in providing us your personal data, thus we are striving to protect it. But remember that no method of transmission over the internet, or method of electronic storage is 100% secure and reliable, and we cannot guarantee its absolute security.

Anyway, all data processed in our systems is password protected. All data transfers use HTTPS which means the data is encrypted when being transferred. All third parties that are not based in the EU/EEA and that we may share your personal data with have "Privacy Shields".

Protection authority

The Swedish Data Protection Authority is responsible for supervising the enforcement of the laws concerning data protection. If you think that we act wrongfully, you may contact the Swedish Data Protection Authority. Their website is <https://www.datainspektionen.se>.

Contact us if you have any questions about how we process your personal data

If you have questions about how we process your personal data, you may always contact us at:

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