

# QRIDI - PRIVACY POLICY

7 August 2017

This Privacy Policy is an extended description of personal data file pursuant to Section 10 of the Personal Data Act.

Sections 1–12 of the Privacy Policy are based on the privacy policy template of the Office of the Data Protection Ombudsman, and the remaining sections are derived from Qridi Oy's data protection and contractual practices.

## 1 Controller

Qridi Oy  
Arkistokatu 4  
90100 Oulu, Finland  
[info@qridi.com](mailto:info@qridi.com)

If the user is a direct customer of Qridi Oy, Qridi Oy is the controller referred to in the Personal Data Act.

If the use of the Qridi learning environment by the user is based on an order placed by a corporation client, and the user is not a client of Qridi Oy's services, the corporation client (educational institution/municipality/sports club/another organisation) is the controller referred to in the Personal Data Act. In that case Qridi is the processor of the data file referred to in the Personal Data Act.

## 2 Person responsible for data file matters

Jukka Pirinen  
Arkistokatu 4  
90100 Oulu, Finland  
[jukka@qridi.com](mailto:jukka@qridi.com)

## 3 Name of data file

Qridi information system for schools, municipalities, cities, sports clubs and organisations.

## 4 Purpose of processing personal data

The Qridi information system is an evaluation software designed for schools, municipalities, cities, sports clubs and organisations. The data in the data file are used in the Qridi system.

The data are combined with evaluations conducted or launched by teachers/coaches in order to support the pupil's/athlete's learning and to develop teaching. Evaluations refer to data entered in self, peer, group, parent or teacher evaluations. In addition, use is also made of other features utilised by teachers in teaching, such as a learning diary (information is entered by the pupil) and different types of exercises.

Qridi Oy's maintenance personnel can process the personal data of teachers/coaches in order to create customer relationships or solve problems.

## 5 Content of data file

The following data are saved in the data file:

### Compulsory basic data

- Name of pupil/athlete
- Name of teacher/coach or other member of the personnel
- E-mail address of the teacher/coach
- Identifier of the teacher/coach and pupil/athlete

### Additional information, not compulsory

- E-mail address of the pupil/athlete
- E-mail address of the guardian/athlete
- Name of the school/team
- Name of the municipality
- Class/team and teacher/coach
- Information on the teaching group
- Evaluations issued to the pupil/athlete by the pupil himself/herself, peers, teachers/coaches and parents
- Possible messages between different parties
- Images transferred to the system by the pupil/athlete or teacher/coach.

## 6 Regular sources of data

Basic data are obtained from the school's pupil information register. A person appointed by the school has the right to enter pupil information in the Qridi system or the school can authorise the Qridi company to enter the information. Information is also obtained from the teacher/coach, some other member of the personnel or the guardian and the pupil.

Liabilities related to collecting data are explained in Section 16.

## 7 Regular disclosure of data

The personal data in the data file are not regularly disclosed to third parties.

## 8 Transfer of data to outside the European Union or the European Economic Area

The personal data in the data file are not transferred to outside the European Union or the European Economic Area.

## 9 Principles in accordance to which the data file has been secured

The teacher/coach or other member of the personnel has the right of access to pupil information according to limited user right levels specific to user group or teaching group.

All data in the data file are stored on servers, which are located in Finland and protected according to good information security practices so that they can only be accessed by appointed, authorised persons who need such access in order to carry out their tasks. The servers are kept in locked, monitored premises. Personal data and data on educational institutions (names and e-mail addresses of educational institutions, classes, teachers/coaches and pupils/athletes) are saved in a server database encrypted using a symmetrical encryption algorithm. The encryption key is not saved in the system but is formed according to a specific algorithm from data available in the system, which makes unauthorised access to the data even more difficult.

## 10 Data subject's right of access

The pupil/athlete has the right of access to the data on him/her.

The guardian also has the right of access to the data of a minor pupil/athlete.

A person can exercise his/her right of access by personally issuing a request for access to his/her teacher/coach, visiting the teacher/coach or by producing a personally signed document.

## 11 Right to request rectification of the data

The teacher/coach or controller shall rectify, upon his/her own initiative or the data subject's request, any such data that are irrelevant in view of processing the data in the data file or that are incorrect, unnecessary, deficient or obsolete and that the data subject cannot process on his/her own.

## 12 Other rights related to the processing of personal data

The personal data are not used or disclosed for direct advertising, distance sales or other direct marketing or for market surveys, opinion polls, public registers or genealogical research.

## 13 Confidentiality of personal data

The right of Qridi Oy's employees processing personal data to process the personal data in the data file is limited to their tasks under a non-disclosure agreement.

## 12 Processing of system data

Numerical data in the system can be analysed using statistical methods, provided, however, that any personal data included in the data are omitted or anonymised before carrying out the analysis. The results of the analysis can be used for the purpose of developing Qridi Oy's business.

## 15 Information and notification obligations

In case of data security violations, the company shall immediately notify the relevant parties of such violation and take steps to correct any defects in order to reduce or eliminate the impact of the violation.

## 16 Responsibilities

The school/corporation client is responsible for ensuring that it has the right to disclose or enter the necessary personal data in the system for the purpose set out in the agreement. The school/corporation client is responsible for acquiring such consent and for implementation.

It is prohibited to save any sensitive personal data in the system.

## 17 Termination of processing

When the customer discontinues the use of the service, the personal data are removed from the system after a fixed period of time. Qridi Oy's obligation to maintain the customer's material shall end 60 days after the termination of the agreement. Qridi Oy shall remove the data from the database.

## 18 Obligations to assist

The company shall assist the authorities pursuant to the appropriate acts and decrees.