

Privacy Statement for the Qridi learning environment

This Privacy Statement complies with valid Finnish legislation and also covers the requirements of the EU's General Data Protection Regulation (GDPR).

Sections 1-12 of the Privacy Statement comply with the privacy statement template of the Office of the Data Protection Ombudsman. The other sections are derived from Qridi Oy's data protection and contractual practices or the General Data Protection Regulation.

1 Controller

Qridi Oy
Kasarmintie 13 a
90130 Oulu
info@qridi.fi

If the user is a direct customer of Qridi Oy, Qridi Oy is the controller referred to in the General Data Protection Regulation.

If the use of the Qridi learning environment 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 General Data Protection Regulation.

In that case, Qridi is the processor of the data file referred to in the General Data Protection Regulation and the processing of data is subject to the controller's privacy statement or privacy policy.

2 Person responsible for data file matters

Jukka Pirinen
Kasarmintie 13 a
90130 Oulu
jukka@qridi.fi

3 Name of data file

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

4 Purpose and grounds 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 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 during customer account creation or when resolving customer issues.

The justification for processing personal data in Qridi's information system is Qridi Oy's legitimate interest based on a customer relationship and/or other factual connection or the execution of an agreement.

The purpose of processing personal data is to:

- deliver and develop our products and services,
- fulfil our contractual and other promises and obligations,
- take care of customer relationships, and to
- analyse and profile the behaviour of a customer or another data subject.

We use automatic decision-making (incl. profiling) in recognising the data subjects' personal profiles and web behaviour. We use the data for targeting and developing our services.

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 another member of the personnel *
- E-mail address of the teacher/coach *
- Internal identifier of the teacher/coach and pupil/athlete *

Additional information, not compulsory

- E-mail address of the pupil/athlete
- E-mail address of the parent/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.

Submitting the personal data marked with an asterisk is a precondition for entering a contractual relationship and/or customer relationship with us. We cannot provide the product and/or service without the necessary personal data.

6 Regular sources of data

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

Data collection responsibilities 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 outside the European Union or the European Economic Area

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

9 Principles in accordance to which the data file is secured

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

All data in the data file are stored on servers that are located in Finland and protected according to good information security practices and that 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 the 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 concerning them. The parent of a minor pupil/athlete also has the right of access to such data. A person can exercise their right of access by personally submitting a request for access to their teacher/coach, visiting the teacher/coach or by producing a personally signed document.

Pursuant to the General Data Protection Regulation, the pupil/athlete has the right (as of 25 May 2018) to oppose or request the restriction of the processing of their data and lodge an appeal about the processing of personal data with the supervisory authority.

For special personal reasons, a pupil/athlete also has the right to oppose the processing of their data even if such processing is based on Qridi Oy's legitimate interest. In connection with the request, the pupil/athlete must specify the situation on the basis of which the processing of data is opposed. Qridi Oy can only refuse to accept the pupil's/athlete's opposition request on grounds set out in law.

11 Right to request rectification of the data

The teacher/coach or controller rectifies, upon their own initiative or based on the data subject's request, without undue delay any such data that are irrelevant, incorrect, unnecessary, deficient or obsolete in view of processing the data in the data file and that the data subject cannot adjust on their own.

12 Other rights related to the processing of personal data

Personal data are not used or disclosed for use in 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 is limited to their tasks under a non-disclosure agreement.

14 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 any data security violations, Qridi Oy immediately notifies the relevant parties of such violation and takes steps to correct any defects in order to mitigate or eliminate the impacts of the violations.

16 Agreeing on responsibilities

If Qridi Oy is the processor of the data file, 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 and implementing such consents. Sensitive personal data may not be stored in the system.

17 Discontinuation 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 will end 60 days after the termination of the agreement. Qridi Oy will remove the data from the database.

We regularly assess the need to store data based on applicable legislation. In addition, we take all reasonable steps to ensure that personal data about data subjects that are incompatible, obsolete or defective in view of the purpose of the processing are not stored in the data file. We will adjust or destroy such data immediately.

18 Obligations to assist

Qridi Oy assists the authorities pursuant to the appropriate acts and decrees.

19 Whom can you contact?

All contacts and requests concerning this Privacy Statement must be submitted in writing or in person to the contact person indicated in Section 2.

20 Changes to the Privacy Statement

We reserve the right to make changes to this Privacy Statement without prior notice. You can always find the latest version of the Privacy Statement on our website with the date in it indicating the latest changes. If the changes are significant, we may inform the relevant parties of it in some other way, such as posting a separate notice on our website.