

PRIVACY POLICY

Last updated on 01.08.2023

1. Who are we?

A controller of your personal data processed in our services AIDIFY sp. z o.o. with its registered office in Lublin (ZIP code: 20-418), ul. Nowy Świat 11A, entered into the Register of the National Court Register kept by the District Court Lublin-Wschód in Świdnik, 6th Commercial Division under NCR number: 0000791766 (“we”, “us”). That means we decide how your data is processed on it by determining the purposes and means of the processing of personal data.

We prepared this Privacy Policy because your right to privacy is important to us and we want you to understand how we collect, use, and share data about you.

If you have any questions to us, please contact us by writing an e-mail to contact@aidfy.eu and adding the “Data protection” in the subject line.

2. What personal data we collect?

We collect only personal data necessary for exercising our purposes as set out below. Providing us with your personal data is not mandatory but it may be necessary to access the platform’s content and to be able to use our services.

We collect certain data from you directly (e.g. Account and Profile Data as defined below) data from third-party platforms you connect with AIDIFY. We also collect some data automatically (e.g. System Data), through the use of server log files and tracking technologies. For details please consult our Cookie Policy.

2.1. Categories of data

Category of personal data	Description	Legal basis and purpose of processing
Account Data	In order to access the platform’s content, you need to create a user account, which requires us to collect and store your email address, password, and account settings. As you use certain features on the site, you may be prompted to submit additional information including (but not limited to) ling, your career path. Upon account creation, we assign you a unique identifying number.	<ul style="list-style-type: none">• Performance of contract• Legitimate interests (service provisioning, identity verification, fraud prevention and security, communication)
Profile Data	Profile information include a photo, headline, biography, language, website link, social media handles, country, or other data. Providing us with this information is optional. The availability of profile data depends on user settings.	<ul style="list-style-type: none">• Performance of contract• Legitimate interests (enhanced platform functionality, convey content source information)
Shared Content	Since some services we provide in the platform let you interact with other users or share content publicly, we process data related to those activities including data in uploaded courses and other educational content, reviews about content, your questions and answers, messages sent to other course attendees or SMEs, or posting photos or other work you upload. Such	<ul style="list-style-type: none">• Performance of contract• Legitimate interests (service provisioning, enhanced platform functionality)

	shared content may be publicly viewable by others depending on where it is posted.	
Learning Data	We also collect certain data related to the platform's content you access including courses, assignments, labs, workspaces, and quizzes you've started and completed; content and subscription purchases and credits; subscriptions; completion certificates; your exchanges with SMEs, and other course attendees, answers to questions, and other items submitted to satisfy course and related content requirements.	<ul style="list-style-type: none"> • Performance of contract • Legitimate interests (service provisioning, enhanced platform functionality)
Organisation Payment Data	We collect certain data about your purchase (such as your name, billing address, and ZIP code and other data from invoices) as necessary to process your order and which may optionally be saved to process future orders.	<ul style="list-style-type: none"> • Performance of contract • Legal obligation • Legitimate interests (payment facilitation, fraud prevention and security, compliance)
SME Payment Data	If you are a subject matter expert ("SME") we collect and process certain information, including the email address associated with your account, your account ID, physical address or other data necessary to send payments assigned to your account. In certain situations we may collect data from an automated payment systems or wire transfer information to send payments to your account. To ensure compliance with applicable laws, we work with trusted third-party companies that collect information for tax purposes required by law. This information may include location data, tax identification numbers, biographical information and other personal information necessary for tax purposes.	<ul style="list-style-type: none"> • Performance of contract • Legal obligation • Legitimate interests (service provisioning, payment facilitation, fraud prevention and security, comp)
Data About Your Accounts on Other Services	We may obtain certain information through your social media or other online accounts if they are connected to your AIDIFY account. If you log in to AIDIFY via third-party platform or service (such as SSO), we ask for your consent to access certain information about that other account. The information we receive depends on what information are available on that platform/service (including via your privacy settings there) as those platforms and services make information available to us through their APIs. If you access or use our services through a third-party platform or service, or click on any third-party links, the collection, use, and sharing	<ul style="list-style-type: none"> • Legitimate interests (identity verification, user experience improvement)

	of your data will also be subject to the privacy policies and other agreements of that third party.	
Sweepstakes, Promotions, and Surveys	We may invite you to complete a survey or participate in a promotion (like a contest, challenge or sweepstakes), either through our services or a third-party platform. If you participate, we will collect and store the data you provide as part of participating, such as your name, email address, postal address, or phone number, for administer the promotion or survey, including for notifying winners and distributing rewards. To receive a reward, you may be required to allow us to post some of your information publicly (like on a winner's page). Where we use a third-party platform to administer a survey or promotion, the third party's privacy policy will apply.	<ul style="list-style-type: none"> • Performance of contract • Legitimate interests (promotions administration, prize delivery, compliance)
Contact and Support	If you contact us for support or to report a problem or concern (regardless of whether you have created an account), we collect and store your contact information, messages, and other data about you like your name, email address, messages, location, user ID, refund transaction IDs, and any other data you provide or that we collect through automated means (which we cover below). We use this data to respond to you and research your question or concern.	<ul style="list-style-type: none"> • Legitimate interests (customer and technical support)
Data collected through use of automated means		
System Data	Technical data about your computer or device, like your IP address, device type, operating system type and version, unique device identifiers, browser, browser language, domain and other systems data, and platform types.	<ul style="list-style-type: none"> • Performance of contract • Legitimate interests (service provisioning, customer and technical support, fraud prevention and security, communication, product improvement)
Usage Data	Usage statistics about your interactions with the services, including content accessed, time spent on pages or the Service, pages visited, features used, your search queries, click data, date and time, referrer, and other data regarding your use of the Services.	<ul style="list-style-type: none"> • Legitimate interests (service provisioning, user experience improvement, product improvement)
Approximate Geographic Data	An approximate geographic location, including information like country, city, and geographic coordinates, calculated based on your IP address.	<ul style="list-style-type: none"> • Legitimate interests (user experience improvement, fraud prevention and security, compliance)

2.2. Categories of users

Data we collect and process about you depends on capacity in which you use our services.

Categories of users	Description	Categories of personal data we process
Administrator	A user managing the profile of the organisation in the AIDIFY platform on its behalf. Administrators do not have access to the platform's content.	Organisation Payment Data, Contact and Support, System Data, Approximate Geographic Data
Manager	A user with access to the educational content contained in the AIDIFY platform) and is assigned in the role of manager to at least one team within their organisation. The Manager is responsible for managing the team within the organisation.	Account Data, Profile Data, Shared Content, Learning Data, Data About Your Accounts on Other Services, Sweepstakes, Promotions, and Surveys, Contact and Support, System Data, Usage Data, Approximate Geographic Data
Course Attendant	A user with access to the educational content contained in the AIDIFY platform whose main objective is to learn using the resources of the platform.	
Subject Matter Expert ("SME")	A user who is the author of at least one course in the AIDIFY platform, and whose main objective is to analyse and conduct interactions assigned to their course with other users as well as to review the statistics of the courses they teach.	Account Data, Profile Data, Shared Content, Learning Data, Data About Your Accounts on Other Services, Sweepstakes, Promotions, and Surveys, Contact and Support, System Data, Usage Data, Approximate Geographic Data, SME Payment Data
User	Each user that created an account in the AIDIFY platform	Account Data, Profile Data, Shared Content, Data About Your Accounts on Other Services, Sweepstakes, Promotions, and Surveys, Contact and Support, System Data, Usage Data, Approximate Geographic Data
Guest	Each person browsing AIDIFY services without logging in the platform.	Contact and Support, System Data, Usage Data, Approximate Geographic Data

3. Who do we share your data with?

We share certain data about you with SMEs, other course attendees and managers of your teams, our business partners and third-party providers (of such services as accounting and tax advisory services, legal advisors, professional training services, IT systems, auditors, course and teaser recording and editing services).

Those recipients of your personal data may be located in countries outside the European Union (“**EU**”) or European Economic Area (“**EEA**”). Personal data will only be transferred outside the EU or EEA either to countries that the European Commission has confirmed an adequate level of data protection or with implementation of appropriate safeguards.

4. For how long we will process your personal data?

We will only process your personal data for the period necessary to fulfil the purposes of the processing as determined in 2.1.

For the marketing purposes, we will process your personal data until you object to the processing.

If our processing of your data is based on your consent (e.g. when we process personal data in cookies other than necessary cookies), you may also withdraw your consent at any time.

5. What rights do you have with regard to data we process?

In accordance with the provisions of GDPR (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC), you may exercise your following rights:

- Right to information on personal data processed by us and access to this data;
- Right to rectification of inaccurate or incomplete personal data that concerns you;
- Right to erasure of your personal data;
- Right to restriction of processing;
- Right to data portability;
- Right to object to processing of your personal data.

You also have the right to lodge a complaint with a President of the Personal Data Protection Office (<https://www.uodo.gov.pl/>, Prezes Urzędu Ochrony Danych Osobowych, ul. Stawki 2, 00-193 Warszawa, Poland). However, before you do, we encourage you to contact us directly with any concern you may have.