

LESSONAPP PRIVACY STATEMENT

LessonApp Oy (“**LessonApp**” or “**we**”) provides an online education platform (“**Service**”) available at lessonapp.fi and lessonapp.com and other websites (the “**Website**”) and as a mobile application (“**Application**”) for the purpose of providing educational material and an information sharing platform for teachers and educators around the world.

In this Privacy Statement we explain how we process the data of our private customers (“**Individual Users**”) and the representatives of our customer organizations (“**Organization Users**”) subscribing to and using the Service as well as the unregistered users of our Website (“**Unregistered Users**”). In this Privacy Statement, the word “**User**” or “**you**” refers jointly to the Organization Users, Individual Users and Unregistered Users.

Our Privacy Statement explains, for example, the types of personal data we process, how we process the personal data and how you may use your rights as a data subject.

Some of our services might be subject to a separate privacy policy. If a separate privacy policy applies to a particular service, we will post it in connection with the service in question.

This Privacy Statement may be updated from time to time in order to reflect the changes in data processing practices or otherwise. You can find the current version on the Website and the Application. We will not make substantial changes to this Privacy Statement or reduce the rights of the Users under this Privacy Statement without providing a notice thereof to the Users who have provided us with their email address.

This Privacy Statement applies to processing of personal data carried out by LessonApp as data controller.

1. LessonApp’s contact details

Name: LessonApp Oy
Company ID: 2890429-8
Correspondence address: Vesitehtaankuja 1 as 1, 36200 Kangasala
E-mail address: info@lessonapp.fi
lessonapp.fi

Contact person: Ellimaija Ahonen

2. Personal data processed and sources of data

You may subscribe to the Service as an Individual User or as an Organization User by providing us with your full name, email address, username and password to the Service.

The personal data collected and processed by us in connection with your subscription to and use of the Service as well use of the Website can be divided into two general data categories: User Data and Analytics Data.

User Data

User Data is personal data collected directly from you, your organization, public sources or generated by us. We may collect User Data from our Users in a variety of ways, including, when they subscribe to and use the Service, subscribe to a newsletter or fill out a form.

We may process the following User Data relating to the Individual Users and Organization Users:

- first and last name
- email address
- country of residence
- username
- password

- notes, pictures as well as other information and material relating to your lessons you upload to the Service
- level of education and experience
- user profile data
- feedback and performance data
- communication between you and LessonApp
- communication between you and the other users of the Service
- marketing opt-ins and opt-outs

Analytics Data

The logging systems used by the Website automatically log certain Analytics Data when you visit the Website. Although we do not normally use Analytics Data to identify you as an individual, you can sometimes be recognized from it, either alone or when combined or linked with User Data. In such situations, Analytics Data can also be considered personal data under applicable laws and we will treat such data as personal data.

We may automatically collect the following Analytics Data when you visit or interact with the Website:

- **Device Information.** We collect the following information relating to the technical device you use when using the Website:
 - device and device identification number, device IMEI
 - country
 - IP address
 - browser type and version
 - operating system
 - name of your Internet service providers
 - advertising identifier of your device
- **Usage Information.** We collect information on your use of the Website, such as:
 - time spent on the Website
 - interaction with the Website
 - the time and date of your visits to the Website
 - the sections of the Website you visited

Cookies

We use various technologies to collect and store Analytics Data and other information when the Users visit the Website, including cookies, pixel tags and web beacons.

Cookies are small text files sent and saved on your device that allows us to identify visitors of the Website and facilitate the use of the Website and to create aggregate information of our visitors. This helps us to improve the Website and better serve our Users. The cookies will not harm your device or files. We use cookies to tailor the Website and the information we provide in accordance with the individual interests of our Users.

The Users may choose to set their web browser to refuse cookies, or to alert when cookies are being sent. For example, the following links provide information on how to adjust the cookie settings on some popular browsers:

[Safari](#)

[Google Chrome](#)

[Internet Explorer](#)

[Mozilla Firefox](#)

Please note that some parts of the Website (such as some parts of the Service) may not function properly if use of cookies is refused.

Web analytics services

The Website uses Google Analytics and other web analytics services to compile Analytics Data and reports on visitor usage and to help us improve the Website. For an overview of Google Analytics, please visit [Google Analytics](#). It is possible to opt-out of Google Analytics with the following browser add-on tool: [Google Analytics opt-out add-on](#).

3. Purposes and legitimate grounds for the processing of your personal data

Purposes

There are several purposes of the processing of your personal data by LessonApp:

To provide the Website and the Service

LessonApp processes your personal data to be able to offer the Website and the Service to you and to the customer organization you're representing in case you are an Organization User.

If you contact our customer service, we will use the information provided by you to answer your questions or solve your complaint.

For our legal obligations

LessonApp processes data to enable us to administer and fulfil our obligations under the law. This includes data processed for complying with our bookkeeping obligations and providing information to relevant authorities such as tax authorities.

For claims handling and legal processes

LessonApp may process personal data in relation to claims handling, debt collection and legal processes. We may also process data for the prevention of fraud, misuse of our services and for data, system and network security.

For customer communication and marketing

LessonApp processes your personal data to contact you regarding the Service and to inform you of changes relating to it. Your personal data are also used for the purposes of marketing the Service and our other relevant services to you.

For quality improvement and trend analysis

We may also process information about your use of the Website and the Service to improve the quality of the Website and the Service e.g. by analyzing any trends in the use of the Website and the Service. In order to ensure that our services are in line with your needs, personal data can be used for things like customer satisfaction surveys. When possible, we will do this using only aggregated, non-personally identifiable data.

Legal grounds for processing

LessonApp processes your personal data primarily to pursue our legitimate interest to run, maintain and develop our business and to create and maintain customer and other business relationships. When choosing to use your data on the basis of our legitimate interests, we weigh our own interests against your right to privacy and e.g. provide you with easy to use opt-out from our marketing communications and use pseudonymized or non-personally identifiable data when possible.

If you are an Individual User, we process your personal data also in order to fulfill our contractual obligations to you.

We may also process your personal data in order to comply with legal obligations.

In some parts of the Website and the Service you may be requested to grant your consent for the processing of personal data. In this event, you may withdraw your consent at any time.

4. Transfers to countries outside Europe

We have service providers in several geographical locations. As such, we and our service providers may transfer your personal data to, or access it in, jurisdictions outside the European Economic Area or the User's domicile.

We will take steps to ensure that the Users' personal data receives an adequate level of protection in the jurisdictions in which they are processed. We provide adequate protection for the transfers of personal data to countries outside of the European Economic Area through a series of agreements with our service providers based on the [Standard Contractual Clauses](#) or through other appropriate safeguards, such as the [Privacy Shield Framework](#).

More information regarding the transfers of personal data may be obtained by contacting us on any of the addresses indicated above.

5. Recipients

We only share your personal data within our organization if and as far as reasonably necessary for the purposes of this Privacy Statement.

We do not share your personal data with third parties outside of LessonApp's organization unless one of the following circumstances applies:

For the purposes set out in this Privacy Statement and to authorized service providers

To the extent that third parties need access to User Data in order for us to perform the Services, we provide such third parties with your data. Furthermore, we may provide your personal data to our affiliates or to authorized service providers who perform services for us (including data storage, accounting, sales and marketing) to process it for us and to payment service providers to process your payments to us.

When your personal data is processed by third parties as data processors on behalf of LessonApp, LessonApp has taken the appropriate contractual and organizational measures to ensure that your data are processed exclusively for the purposes specified in this Privacy Statement and in accordance with all applicable laws and regulations and subject to our instructions and appropriate obligations of confidentiality and security measures.

Please bear in mind that if you provide personal data directly to a third party, such as through a link in the Service, the processing is typically based on their policies and standards.

For legal reasons and legal processes

We may share your personal data with third parties outside our organization if we have a good-faith belief that access to and use of the personal data is reasonably necessary to: (i) meet any applicable law, regulation, and/or court order; (ii) detect, prevent, or otherwise address fraud, crime, security or technical issues; and/or (iii) protect the interests, properties or safety of LessonApp, the Users or the public as far as in accordance with the law. When possible, we will inform you about such processing.

For other legitimate reasons

If LessonApp is involved in a merger, acquisition or asset sale, we may transfer your personal data to the third party involved. However, we will continue to ensure the confidentiality of all personal data. We will give notice to all the Users concerned when the personal data are transferred or become subject to a different privacy statement.

With your explicit consent

We may share your personal data with third parties outside LessonApp when we have your explicit consent to do so. You have the right to withdraw this consent at all times.

6. Storage period

LessonApp does not store your personal data longer than is legally permitted and necessary for the purposes of providing the Service or the relevant parts thereof. The storage period depends on the nature of the information and on the purposes of processing. The maximum period may therefore vary per use.

All Analytics Data and most User Data relating to an Individual User and an Organization User will be deleted after a reasonable retention period has lapsed after the Individual User or the customer organization the Organization User is representing has terminated their subscription to the Service. Thereafter, some of the User Data may be stored by us only as long as such processing is required by law or is reasonably necessary for our legal obligations or legitimate interests such as claims handling, legal proceedings, bookkeeping, internal reporting and reconciliation purposes.

We will store Analytics Data of Unregistered Users for a reasonable retention period.

7. Your rights

Right to access

You have the right to access and be informed about your personal data processed by us. We give you the possibility to view certain User Data through your user account on the Service or request a copy of your personal data.

Right to withdraw consent

In case the processing is based on a consent granted by the User, the User may withdraw the consent at any time. Withdrawing a consent may lead to fewer possibilities to use the Website and the Service. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

Right to rectify

You have the right to have incorrect or incomplete personal data we have stored about you corrected or completed by contacting us. You can correct or update some of your User Data through your user account on the Service.

Right to erasure

You may also ask us to delete your personal data from our systems. We will comply with such request unless we have a legitimate ground to not delete the data.

Right to object

You may have the right to object to certain use of your personal data if such data are processed for other purposes than necessary for the provision of the Website or the Service or for compliance with a legal obligation. If you object to the further processing of your personal data, this may lead to fewer possibilities to use the Website and the Service.

Right to restriction of processing

You may request us to restrict processing of personal data for example when your data erasure, rectification or objection requests are pending and/or when we do not have legitimate grounds to process your data. This may however lead to fewer possibilities to use the Website and the Service.

Right to data portability

You have the right to receive the personal data you have provided to us yourself in a structured and commonly used format and to independently transmit those data to a third party.

How to use your rights

The abovementioned rights may be used by sending a letter or an e-mail to us on the addresses set out above, including the following information: the full name, address, e-mail address and a phone number. We may request the provision of additional information necessary to confirm the identity of the User. We may reject requests that are unreasonably repetitive, excessive or manifestly unfounded.

8. Direct marketing

The User has the right to prohibit us from using the User's personal data for direct marketing purposes, market research and profiling made for direct marketing purposes by contacting us on the addresses indicated above or the unsubscribe possibility offered in connection with any direct marketing messages.

9. Lodging a complaint

In case the User considers our processing of personal data to be inconsistent with the applicable data protection laws, a complaint may be lodged with the local supervisory authority for data protection. In Finland, the local supervisory authority is the Data Protection Ombudsman (www.tietosuoja.fi).

10. Information security

We use administrative, organizational, technical, and physical safeguards to protect the personal data we collect and process. Measures include for example, where appropriate, encryption, pseudonymization, firewalls, secure facilities and access right systems. Our security controls are designed to maintain an appropriate level of data confidentiality, integrity, availability, resilience and ability to restore the data. We regularly test the Service, systems, and other assets for security vulnerabilities.

Should despite of the security measures, a security breach occur that is likely to have negative effects to the privacy of the Users, we will inform the relevant Users and other affected parties, as well as relevant authorities when required by applicable data protection laws, about the breach as soon as possible.