



Data protection policy (the Policy) of the EDGE CERTIFIED FOUNDATION (EDGE) eLearning platform (the Platform)

EDGE is committed to protecting confidentiality, professional secrecy, and security. Likewise, EDGE assumes the commitment to guarantee the User privacy at all times and not to collect unnecessary information.

For the sake of transparency, the Policy describes how EDGE collects, uses, and shares data, and what choices the User has with respect to the User's data when browsing the Platform. The Policy also describes the potential consequences of exercising these rights. The Policy is applicable to the entire contents and solely to the Platform for use via the Internet (Software-as-a-Service).

For the purpose of the Policy, the User is deemed to be the one using the Platform for the User's own behalf and the User's own needs or the one designated to use the Platform on behalf of the organization to which the User belongs.

If the User, or the User's organization, does not accept the terms of the Policy, then the User is required not to access, browse, or use the Platform. In no event shall EDGE be liable for any consequences borne by a User or a User's organization of a User's refusal to use the Platform.

EDGE shall not be liable for access, browsing or use of the platform by any person not authorized by EDGE or one of its contractual partners.

Type of data collected and method of collection

Among the types of data related to a identified or identifiable living individual that the Platform collects, by itself or through third parties or through prior collection, there are email address, first name, last name, IP address, usage data and company name that can be related to an identified or identifiable living individual (hereinafter together Personal Data).

Complete details on each type of Personal Data collected are provided in the dedicated sections of the Policy or by specific explanation texts displayed prior to the data collection.

In order to use certain functionalities of the Platform, the User, or the User's organization on the User's behalf, has transmitted to EDGE the User full name and professional email



address. Under no circumstances shall EDGE be held liable for the lack of the User's consent to the transmission of such data.

As the case may be, Users are responsible for any third-party personal data obtained, published, or shared through the Platform and confirms that the User has the third party's consent to provide such data.

Legal basis of processing

EDGE shall process Personal Data relating to Users if one of the following applies

- The consent of the User, or the User's organization on the User's behalf, has been given for one or more specific purposes.
- Provision of Data is necessary for the performance of a contract/agreement/understanding with the User, User's organization and/or for any pre-contractual obligations thereof.
- Processing is necessary for compliance with a legal obligation to which EDGE is subject.
- Processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in EDGE.
- Processing is necessary for the purposes of the legitimate interests pursued by EDGE or by a third party.

Methods of processing

EDGE takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Personal Data.

The Personal Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to EDGE, in some cases, the Personal Data may be accessible to certain types of persons in charge, involved with the operation of the Platform (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as data processors by EDGE.

The purposes of processing in general

The Personal Data is collected to allow EDGE to provide its service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity.



Service providing

The User's full name is used for the purpose of ensuring that this is a User authorized to access the Platform.

The email provided will be used for ensuring secure access to and use of the Platform, as well as the recoverability of the User credentials.

Legal action

The User's Personal Data may be used for legal purposes by EDGE in court or in the stages leading to possible legal action arising from improper use of this Website or the related services.

The User acknowledges that EDGE may be required to reveal personal data upon request of public authorities.

System logs and maintenance

For operation and maintenance purposes, the Platform and any third-party services may collect files that record interaction with the Platform (system logs) or use other Personal Data for this purpose.

Interaction with external services

The platform may use third party and external services, that might still collect web traffic data for the pages where the service is installed, even when Users do not use it.

For instance, the Platform uses YouTube IFrame Player to deliver video content. Through this service, provided by Google LLC, the Platform may collect Personal Data directly or indirectly on or from Users' devices, including by making use of trackers.

Users may restrict such access to their Personal Data via the security settings page provided by Google.

User's and the User's organization's rights

User, or the User's organization, may request EDGE to change User's name or email address to the extent permitted by the contract/agreement/understanding between them.



The User, or the User's organization, may request EDGE to delete the User's account and related information. However, EDGE will not be held responsible if the deletion of the account prevents the performance of the contractually agreed services between them. EDGE reserves all its rights to this extent and to demand their enforcement.

Furthermore, EDGE shall not be liable for any use by a User of services beyond the intended use proposed on the Platform, including the services provided by third parties.

Rights related to automated decision-making, including profiling

The answers given by a User during an evaluation are automatically corrected and the result is automatically given by the Platform. When a certain number of failures are encountered, EDGE shall personally contact the User concerned, or the User's organization, to take appropriate action.

EDGE has the exclusive right to define the maximum number of failures allowed for each type of assessment.

Places and Security

EDGE stores information processed by itself, including Personal Data, on its own servers and also on servers of companies hired to provide services.

EDGE controls its own copy of information collected through the Platform or collected for serving its purposes and has an information security program designed to protect information in its possession or control. This is done through a variety of privacy and security policies, processes, and procedures. EDGE uses administrative, physical, and technical safeguards that reasonably and appropriately protect the confidentiality, integrity, and availability of the information that it collects, receives, stores, or transmits.

Nonetheless, no method of transmission over the Internet, or method of electronic storage, is 100% secure; and therefore, EDGE cannot guarantee its absolute security.

While EDGE works hard to ensure the integrity and security of its network and systems, EDGE cannot guarantee that its security measures will prevent "hackers" or other unauthorized persons from illegally accessing or obtaining information.

If a security system breach occurs EDGE may send an email to the User at the email address associated with the User's account, which the user irrevocably accepts by browsing the Platform, or at the User's organization email address known by EDGE.



Retention period

EDGE will retain the User's Personal Data for as long as the User's account is active or as needed to provide him with services; to maintain a record of the User's learning path, for audits, and compliance purposes; to comply with EDGE legal obligations, resolve disputes, enforce its contract, agreement and/or understanding, and as otherwise permitted by applicable law.

EDGE reserves its right to keep and stores the User's learning data (in a manner and to the extent permitted under applicable law) for scientific research in cognitive science and education purposes.

Additional information about User's Personal Data

In addition to the information contained in the Policy, the Platform may provide the User with additional and contextual information concerning particular services or the collection and processing of Personal Data upon request. However,

Under no circumstances shall the User's data be used for commercial purposes by EDGE. This includes, without prejudice of others, the use of analytical tools.

Miscellaneous

Any version of this Privacy Policy in a language other than English is provided for convenience. The User understands and agrees that the English-language version will control if there is any conflict.

EDGE undertakes to make every reasonable effort to ensure that the processing of data by it, or a third party, is in compliance with applicable laws. However, EDGE excludes any liability for any disproportionate effort that may be expected of it to prevent a breach in the protection of Personal Data.

Changes to this privacy policy

EDGE reserves the right to make changes to this privacy policy at any time by notifying its Users on this page and possibly within the Platform and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to EDGE. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User's consent, EDGE shall collect new consent from the User, where required.



Contact Information

EDGE CERTIFIED FOUNDATION
Vorstadt 2
6300 Zug
Switzerland

+41 41 530 11 49

admin@edge-cert.org