

## PART ONE: Why is this Notice important to you?

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### 1. Introduction

This Privacy Notice relating to the protection of personal data (hereinafter, the "**Privacy Notice**") is designed to inform you about the personal data relating to you processed by The Coco World s.à.r.l., acting as data controller (hereinafter, "**Coco World**", **we, our**", as the case may be), whose registered office is located 9 Rue du Laboratoire, 1911 Luxembourg, and which is registered with the Luxembourg Trade and Companies Register under number B237127.

We attach a great importance to the protection of the personal data entrusted to us, in particular by the users of Coco World's digital learning platform (hereinafter, the "**Coco Classroom**" or the "**Platform**"). That is why we **secure and protect your data in accordance with applicable legislation**, including the General Data Protection Regulation<sup>1</sup> (hereinafter, the "**GDPR**") and the Luxembourg law of August 1<sup>st</sup> 2018 relating to the organization of the *Commission nationale pour la protection des données* and implementation of the 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 (General Data Protection Regulation), amending the Labour Code and the amended Law of 25 March 2015 laying down the salary system and the conditions and procedures for promotion of civil servants.

Through this Privacy Notice, we wish to inform you about what personal data we process about you, for what purpose we use it, and with whom we share it. We will detail the legal basis on which we process your data and explain your rights and the choices available to you.

## PART TWO: What data about you do we process and how?

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### 2.1 What personal data do we process about you?

We have indicated in the table below the categories of personal data that we process about you and how we collect them.

Categories of data	Description of the data
Contact details of users	This is data that is either communicated to us by your school or by yourself when you register to our Platform (name, email address, , preferred language).

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<sup>1</sup> 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 (General Data Protection Regulation)

<b>Categories of data</b>	<b>Description of the data</b>
Self-assessment	This is data communicated by students at the start of every course that they will take on the Platform.
Video assignment	As students complete modules and courses they will be required to submit video assignments as part of the completion criteria. The Platform allows the student to record the video assignments and upload them to the Platform for peer review and teacher review.
Recommended training modules	A recommendation will be provided to the student based on the self-assessment result and will indicate the modules that the student will need to take.
Score and completion status per course	The status/ progress of the courses taken and the results are calculated by the Platform and displayed on the student's personal dashboard.
Peer-review comment	Once video assignments have been submitted by the student, these video assignments can be peer reviewed by the members of the group that the student belongs to, and the reviewer may add their comments to the video assignments through the Platform.
Private files	Users can store private files on the Platform
Profile	Students can manage their profile information through the Platform (photo, first and last name, personal interests, name of school)
Communications	Students will be able to send messages (via email) to students in their group and teachers who can reply back. Teachers may as well post announcements to their classroom.
Reflective feedback	A free text area allows the students to enter their reflective feedback on the learning module.
Post-assessment	The post assessment at the end of each module will check the knowledge gain of the

Categories of data	Description of the data
	student on completing the course, based on the self-assessment taken at the start of the course.
Log files	To debug errors, provide information in case of incidents and optimize performance of the Platform, system accesses, clicks on links and activation of events such as media is logged.

**2.2 For what purposes do we use your personal data and on what legal basis do we use them?**

We have indicated in the table below the purposes for which we process your personal data, the associated legal basis on which we legally process your personal data and the categories of personal data (as identified above) used for those purposes:

Purpose	Legal basis	Categories of data
Managing your access to the Platform	We need to process your data to execute the contract between us or to perform pre-contractual measures taken at your request (for example providing users that have indicated their interest with a link to the Platform Registration Form and/or sending participants to the Young Pro’s Project the Participant Profile Data Collection Form that we need to set-up your account).	Contact details of users Profile
Allow you to register to one of our Information Session	Consent	Contact details of users

<b>Purpose</b>	<b>Legal basis</b>	<b>Categories of data</b>
Define trainings needs	We need to process your data to execute the contract between us.	Self-assessment
Provide training	We need to process your data to execute the contract between us.	Recommended training modules Private files
Provide training results	We need to process your data to execute the contract between us.	Score and completion status per course Reflective feedbacks on the learning modules Post-assessment Peer-review comment
Allow users to share videos	We need to process your data to execute the contract between us.	Video assignment Peer-review comment Private files
Provide support & maintenance	We need to process your data to execute the contract between us.	Communications Log files
Secure our Platform	We process your data because of our legitimate business interest to ensure the confidentiality, integrity, availability and resilience of our data processing systems.	Log files
Improve our Platform	We process your data because of our legitimate business interest to optimize the services that we provide to you.	Post-assessment Log files

**2.3 Who has access to your data?**

To pursue the purposes specified above, we will share your personal data with the following recipients:

Categories of recipients	Reason for sharing
Service Providers	We collaborate with service providers who work on our behalf and who may need access to some of your personal data to provide us with their services. These include companies we have hired to provide hosting and platform management services].
Our staff	In some cases, our staff will need access to your personal data to enable us to pursue the purposes indicated above.
Other users	As users complete the modules and courses they will be required to submit video assignments as part of the completion criteria. The Platform will allow the users to record the video assignments and upload them to the Platform for peer review and teacher review.

Some of our service providers are located in countries other than ours. When we transfer personal data to countries outside the European Economic Area that are considered by the European Commission as not providing an adequate level of protection for personal data, we use Standard Contractual Clauses approved by the European Commission to ensure adequate protection. For further information, including a copy of the documents used to protect your personal data, please contact us as indicated in section 4.2. below.

## 2.4 Use of Cookies

Cookies are small text files placed in the browser of your computer (or other digital device used) by websites that you visit. They are widely used to make websites work, or work more efficiently, as well as to provide information to the owners of the website.

### 2.4.1 Cookies not requiring consent

Our Platform uses cookies to function. These cookies do not require consent. They cannot be refused if you wish to visit the Platform since they are strictly necessary for its proper functioning. Please refer to the table below for all relevant information about these cookies.

Name of cookies	Domain that places the cookie	First-party or third-	Information processed	Purpose	Legal base	Running time	Possibility for third parties to have access
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		party cookie					
AWSAL B	aws.amazon.com	Third party Cookie	Session Stickiness	AWS Classic Load Balancer Cookie. This cookie is maintained by AWS and the purpose of the cookie is to increase the application performance for repeating customers	Legitimate interest	7 days	No
AWSAL BCORS	aws.amazon.com	Third Party Cookie	Session Stickiness	AWS Classic Load Balancer Cookie. This cookie is maintained by Amazon and is used for load balancing	Legitimate interest	7 days	No
Moodle Session	cococlassroom.com	First party Cookie	Session Identification	This cookie is strictly necessary. This cookie is used for session verification	Legitimate interest	Session (till browser close)	No

**2.4.2 Cookies Requiring Consent**

Our Platform does not use cookies requiring consent.

**2.5 Links to third party websites**

On certain areas of this Platform, we may provide links to third parties websites, which are not subject to this Privacy Notice. These links are provided as a convenience to you. We also offer Single sign on features offered by Microsoft and Google OAuth authentication services. Please be aware that we do not control such third parties or their websites and that those third parties will have a different privacy notice applying to information collected from you when you are on those third parties’ websites. We encourage you read the privacy notices of all websites carefully before providing personal data.

## PART THREE: How do we protect your data?

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### 3.1 Storage duration

We retain your personal data in accordance with our data retention policy only for **as long as is necessary** to fulfill the purposes described in **section 2** above or in accordance with statutory limitation periods for claims.

### 3.2 Security of your data

We have implemented **technical and organizational measures** in accordance with standard industry practices to ensure an appropriate level of security of the Personal Data processed. Nevertheless, security requires efforts from all actors involved. We thus encourage you to contribute to these efforts by taking appropriate security measures yourself, including using strong passwords and keeping all usernames and passwords (if any) confidential.

### 3.3 Automated decision making and profiling

No automated decision-making or profiling will be made about you as part of the personal data processing described in this Privacy Notice.

### 3.4 Children

This Platform is **not intended for or directed to children under 13**. We do not knowingly or directly collect information from children under the age of 13. If you are under the age of 13, please do not use this Platform and do not provide any personal data. If you are a parent or legal guardian and you believe that your child has provided us with personal information, please contact us using the contact information provided in Section 4 below.

## PART FOUR: You can contact us

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### 4.1 What are your rights?

The GDPR grants individuals certain rights with respect to their personal data. Consequently, we are at your disposal to help you to benefit from these rights. Except as limited by applicable law and subject to applicability, the following rights are granted to individuals:

Right of access: the right to be informed about and to obtain access to the personal data processed about you;

Right to rectification: the right to obtain that we rectify or update your personal data when they are inaccurate or incomplete ;

Right to erasure: the right to obtain that we delete your personal data ;

Right to restriction of processing: the right to obtain that we limit the processing of all or part of your personal data ;

Right to object : the right to object at any time to the processing of your personal data for reasons relating to your particular situation ; the right to object at any time to the processing of your personal data for direct marketing purposes;

Right to data portability: the right to receive a copy of your personal data in electronic format and the right to transmit such personal data for use by a third party service; and

Right to object to automated decision making: the right not to be subject to a decision based exclusively on automated processing, including profiling, producing legal effects concerning you or significantly affecting you in a similar way.

These rights may be limited, for example, if the execution of your request reveals personal data of another person, or if you ask us to delete information that we are required to retain by law or because of compelling legitimate interests.

Once we have asked for your consent, you may withdraw it at any time without justification. If you request to withdraw your consent, this will not affect the lawfulness of the processing based on consent before its withdrawal.

To exercise your rights, please contact us using the contact information provided in **section 4.2** below.

Finally, as a data subject, you have the right to lodge a complaint with a supervisory authority (in particular in the European Union Member State of your habitual residence, or your place of work, or the place of the breach) if you consider that the processing of your personal data violates the applicable legislation on the protection of personal data. For your information, you will find the contact details of the Luxembourg Supervisory Authority on its website: [www.cnpd.lu](http://www.cnpd.lu)

## **4.2. How to contact us**

If you have any questions about this Privacy Notice or wish to exercise your rights, please contact our Data Protection Officer by sending us an e-mail to [dpo@thecocoworld.com](mailto:dpo@thecocoworld.com) or by writing to us at 9 Rue du Laboratoire, 1911 Luxembourg.



### **4.3 Effective date and changes**

This Privacy Notice is in effect since October [15 October ] 2020. We reserve the right, at our complete discretion, to change, modify, add, or remove portions of this Privacy Notice at any time. You should check back periodically at this page to read the most recent version of this Privacy Notice as your continued use of this Platform following the posting of changes to these terms will mean you acknowledge these changes.

Thank you for visiting this Platform.