

# Privacy Policy

Effective date: 1 October 2019

Last modified on: 22 October 2019

Hello,

Here at <https://mate.academy> we are committed to protecting and respecting your privacy.

This Privacy Policy applies to your use of the Website and receiving Services insofar it concerns the processing of personal data (or “**data**”). We presume that you should reasonably expect that the use of the Website or receiving Services requires processing your personal data. Should you disagree, you are free to stop using the Website Services or object to personal data processing.

In this document terms have the same meaning as provided in [Terms of Use](#).

As a data controller, we determine the purposes and means of the processing of personal data. what to collect, how long to process it and why.

This Privacy Policy describes what you should expect us to do with your personal data when we act as a data controller. The questions covered are:

- What data we process, on which grounds, and why
- With whom we share data
- How long we storage data
- Your rights
- How we protect your data
- Changes to this Privacy Policy
- Contact information.

If you are under 16 or if the laws of your country set lower age for your viable consent for the processing of your personal data you will need to get your parent’s or guardian’s permission before providing any personal data to the Website.

## Glossary

Personal data (or “**data**”) is any information relating to you and that alone or in combination with other pieces of information gives the opportunity to the person that collects and processes such information to identify you as an individual. It can be your name, your identification number, your location data, or information related to your physical, physiological, genetic, mental, economic, cultural or social identity.

Processing of the information means any action with your personal data, for example, collection, recording, organization, structuring, storage, use, disclosure by any means and so on.

[What data we process, how we process them, on which grounds, and why](#)

## Creating a user account

**Scope.** We collect, use and store your first and last name, email, phone number, date of birth, recovery phone number and/or email.

**Legal ground.** We obtain your consent for this procession, which is indicated by your affirmative actions: filling these data in our application form and by clicking a button “Register”.

**Purpose.** We collect, use and store these data for creating your user account and for its maintenance, namely for user identification when providing Services, for example grading your works during completing a certain course, submitting your feedback on our Website.

**Period for storage.** We store your data as long as your account is in use. In case you are banned or you decide to delete your account or simply stop using it we will keep your data for additional 60 months to ensure we have information in case there are any kinds of disputes between the Website and you.

**Access to these data.** Our contractors access these data for reaching the purposes we described above.

## Launching evaluation process with you

**Scope.** We use your email, first and last name, phone number collected during submission of application for evaluation.

**Legal ground.** We have legitimate interest in the effective provision of the Services.

**Purpose.** We will use these data for sending you invitation, materials necessary for preparation to evaluation as well as replying to you on the results of evaluation.

## User account

**Scope.** After your account has been registered, you will have access to it. You are free to submit further data in your profile, namely your photo, working history, links to social profiles . However, the amount of salary or income you received in the IT industry, your current work place and position, tax declaration are required to be submitted for exercising your duty to pay us a Fee under the Terms of Use.

**Legal ground.** Your free submission of these data constitutes your consent for processing. Submission of the amount of salary or income are based on our legitimate interest to make profits for provision of our Services.

**Purpose.** We collect, use, and storage these data for your account maintenance and for showing this information to our coaches and their assistants for knowing you better while providing Services for you.

**Period for storage.** as long as your account is in use. In case you are banned or you decide to delete your account or simply stop using it we will keep your data for additional 60 months to ensure we have information in case there are any kinds of disputes between the Website and you.

## Feedback

**Scope.** We use your first and last name, your photo, current work place and position provided in your user account when you give us a public feedback on the Website. When you submit us a feedback, the content of your feedback may consist of personal information at your sole discretion. Our Website provides also possibility to post anonymous feedback, where we do not collect or track any personal data of the user who submit such feedback.

**Legal ground.** Providing us with publicly available feedback constitutes your consent.

**Purpose.** We use these data for promotion and improvement of our Services or Website.

**Period of storage.** We will store and display your feedback until the Website ceased or you ask us to delete your feedback.

### Automatic collection

When you use the Website, some third-party services and we can automatically receive the information from your device and send the information back to improve your interaction with the Website, to ensure its effective functioning, and for marketing purposes.

We process such data based on your explicit consent, enabling us to collect the cookies identifiers.

Please, specifically refer to our [Cookies Policy](#) for further details as to our use of cookies and similar technologies.

## Third-party processing

In order to provide you with high-quality Services, we use the following third-party services. With certain third-party services we share data collected from you on our Website, but with most such services you share your data without us.

### Payments

We use third-party payment providers for enabling you to make online payments for Services via the Website, namely Paymentwall Inc, CardPay. We do not collect your payment details and do not transfer any of your data to our payment providers. Instead, payment providers collect and use these data for authorization of payments. Please, refer to their privacy policies to be familiar with how they process and protect your data.

### CRM systems

We share your data from user account with [bpm'online](#) while using their services. We use their services on data retention of users who apply for evaluation and for users who receive our Services. Their services help us to provide users with our customer care. Thus, we have a legitimate interest for sharing these data with bpm'online as external service. You may familiarize yourself on how this service keep data obtained from their customers by reading their Privacy Policy, available on their website. [Bpm'online is compliant](#) with GDPR requirements.

### Phone records

We use [Phonet](#) as service for call recordings when contacting our users for quality assurance. Phonet is a high-end market leader in IP-telephony for business since 2013. Phonet provides corporate telephony for companies from various industries and business. For more details click [here](#).

### Classes recordings

We use [Zoom](#) for scheduling, starting, and conducting video meetings for the purpose of collaborating with our users when providing Training Services, namely course classes, using voice, video, and screen sharing functionality. Zoom is fully GDPR-compliant. If you want to be aware how Zoom process your data, please refer Zoom's [privacy policy](#). We do not transfer any collected data of our users to Zoom.

## Online workspace

We use Slack as the platform for workspaces where we communicate with our Students when providing Training Services. Please, refer to their [Privacy Policy](#) to understand how they process your data. By the way, as most of our external services, Slack is also compliant with the most international data protection laws and regulations such as [GDPR](#) and EU-U.S. and Swiss-U.S. [Privacy Shields](#). We do not transfer any collected data of our users to Slack.

## Completing tasks and grading your work

Apart from our Website, we may ask you to use Figma, GitHub or Codepen for completing tasks and grading your work during a course. These services and software are field-oriented and allow mastering of courses. We do not transfer any collected data of our users to these services. All we do with these services is interacting with our users in a way that is provided by such services.

# How we protect your data

## Technical measures

While communicating with the Website, we use Hypertext Transfer Protocol Secure (HTTPS) for keeping your data secure and communication encrypted.

Technically the data we collect are stored in secure places such as cloud computing platforms of Amazon Web Services (AWS).

## Organizational measures

We require all our employees and contractors to enter into non-disclosure agreements and data processing agreements where it is required by law.

We also will inform users and the respective agencies of personal data breaches should there be high risks of violation of your rights as data subjects. We would also do our best to minimize any such risks.

# Your rights

## General

You have the following rights in relation to your personal data:

- to obtain confirmation that we process your personal data and request a copy of the personal data we hold about you;
- to update the personal data we hold about you, or correct such personal data that you think is incorrect or incomplete;
- to delete personal data that we hold about you, or restrict the way in which we use such personal data;
- to object to our processing of your personal data and withdraw the consent (if the consent is the legal ground for such processing);
- to data portability.

## Right to obtain confirmation that we process your personal data and request a copy of the personal data we hold about you

This means that you can ask Mate academy what personal data of yours is processed. You can also ask for clarifications on the information described above, i.e. purpose of collecting and processing, period of processing, third parties which have access to information. You have a right to request from Mate academy your personal data in a structured, commonly used and machine-readable format.

## Right to update the personal or correct your personal data

This means you can require all the inaccurate or personal data concerning you being corrected.

## Right to delete your data or to restrict the way in which we process them

You can request Mate academy to delete personal data if its processing is no longer necessary to achieve the purposes for which it was collected as well as if there are no legal grounds for the processing. In most cases, if such events occur we will delete your personal data without your request unless otherwise provided by law.

In some cases, prescribed by law you will also be able to restrict the way of processing your data, for example, if you contest the accuracy of your personal data being processed or in case Mate academy is not interested in processing of your personal data any longer, but you want Mate academy to do this on different reasons, for example, to bring some claim for somebody and, instead of the erasure of information, its processing will be restricted.

## Rights to object to our processing of your data and withdraw the consent (if any)

You have a right to object to processing of your personal data when the processing is related to the performance of our task carried in the public interest or in the exercise of official authority vested in us; or we process your data to pursue our or third party's legitimate interests, and you believe that such interests are overridden by your interests or fundamental rights and freedoms.

You also can withdraw your consent for the collection and processing of your personal data by Mate academy at any time by contacting us, without affecting the lawfulness of processing based on consent before its withdrawal. After we receive such withdrawal request from you, we will process it in a timely manner and we will no longer process your personal data, unless otherwise is set by law.

## Rights to data portability

You have a right to obtain your data in a way that can be read and used in different IT environments by the machines and software (right to data portability).

## How to exercise your rights as to your personal data?

We are committed to responding to any verified user as regards any issues arising from this Privacy Policy or applicable data protection laws. We are committed to responding within a reasonable time, bearing in mind the possibility to extend the time to respond up to 30 days by virtue of complexity and number of the requests. In any event, we will inform you of any such extension. Please, be specific in your request regarding exercising any of the above-mentioned rights. You should bear in mind that we are to satisfy your request only on the condition of your successful verification.

To exercise any of your rights, or if you have any other questions about our use of your personal information, please contact us via the contracts indicated below.

## Changes to this Privacy Policy

We may amend or update this Privacy Policy from time to time, updating “Last modified” date at the top of this Privacy Policy and adding the details to the “Key changes” section below. Your further use of this Privacy Policy will confirm your acceptance of this Privacy Policy. Should you disagree with this document you have to stop using the Website.

## Contact information

If you have any questions about the Privacy Policy, please contact us.

MA EDUPARTNERS LIMITED, Registration No. H E 391408, located at Florinis 7, Greg Tower, 2nd floor, 1065, Nikosia, Cyprys

Contact e-mail: [info@mate.academy](mailto:info@mate.academy)