

Kodland Platform

Privacy Policy

- [1. Introduction](#)
- [2. Key terms](#)
- [3. Personal information we collect about you](#)
- [4. How your personal information is collected](#)
- [5. Personal information of information of children](#)
- [6. How and why we use your personal information](#)
- [7. Marketing communications](#)
- [8. Who we share your personal information with](#)
- [9. Where your personal information is held](#)
- [10. How long your personal information will be kept](#)
- [11. Transferring your personal information out of the EEA](#)
- [12. Your rights](#)
- [13. Keeping your personal information secure](#)
- [14. How to complain](#)
- [15. Changes to this privacy policy](#)
- [16. How to contact us](#)

1. Introduction

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal information. It also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain personal information about you. When we do so we are subject to the General Data Protection Regulation (EU) 2016/679 (commonly known as the “GDPR”), which applies across the European Union and we are responsible as the controller of that personal information for the purposes of those laws.

This privacy policy relates to your use of our website <https://www.kodland.org/> and the participation in online lessons and courses administered by third parties (collectively, **Online Courses**) which are hosted on the virtual

classroom environment made available through the website (the **Platform**).

Throughout our website we may link to other websites owned and operated by third parties. These other third-party websites may also gather information about you in accordance with their own separate privacy policies. For privacy information relating to these other third-party websites, please consult their privacy policies as appropriate.

2. Key terms

It would be helpful to start by explaining some key terms used in this policy:

we, us, our	Kodland PTE.LTD, a private company limited by shares incorporated under the law of the Singapore, with UEN 202245370D, and registered office at 68 CIRCULAR ROAD, #02-01, SINGAPORE (049422)
personal information	Any information relating to an identified or identifiable individual.
special categories of personal information	Personal information revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership. Genetic and biometric data. Data concerning health, sex life or sexual orientation.

3. Personal information we collect about you

We may collect and use the following personal information about you:

- name, address and contact details (contact details usually include email address and phone number);
- date of birth;
- payment details;

- details about student's registration to or participation in the Online Courses;
- account details, such as username, login details;
- images of your child provided by you as a profile photo;
- details of any communication you have with us or feedback you give us;
- your preferences in receiving marketing from us and our third parties and your communication preferences;
- any content or information you make public while using our website;
- information about how you use our website.

We do not usually collect any special categories of personal information about you nor do we collect any information about criminal convictions and offences. If there is good reason to collect or process such personal information, we will inform you of the reason in advance and we will only process such personal information with your explicit consent.

4. How your personal information is collected

We collect most of this personal information directly from you - when you access our website, register with us, apply to be admitted to any of the online courses and lessons hosted on our virtual platform (collectively, **Online Courses**), contact us or send us feedback.

However, we may also collect information:

- if you are a student registered for an Online Course, from your parent or legal guardian;
- from publicly accessible sources; and
- from cookies on our website—for more information on our use of cookies, please see our cookies policy.

5. Personal information of information of children

Although the Online Courses are addressed to children of ages 8-17, we do not knowingly collect personal information from the children themselves. When a user is asked to provide information for the purposes of creating an account with us and registering for

an Online Course, we will ask the user to tick a box that the student's parent or guardian have given their consent or permission for the provision of personal information to us in respect of any child below the age of 14.

We take protecting children's information and privacy very seriously. To this end, we limit the collection of personal information of children to no more than is reasonably necessary for the children to participate in the Online Courses and use the Website. In the following section, you can see what types of personal information we process and for what reason.

6. How and why we use your personal information

Under data protection law, we can only use your personal information if we have a proper reason for doing so, e.g.:

- where you have given your consent;
- for the performance of our contract with you or to take steps at your request before entering into a contract;
- to comply with our legal and regulatory obligations;
- for our legitimate interests or those of a third party, which include the proper performance of our contract with you, where your interests and fundamental rights do not override our interests or those of a third party.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) personal information for and the legal bases which we rely on to do so:

What we use personal information for	Type of information	Lawful basis for processing
To provide our services including:		
• to create and manage your account with us	• name, address and contact details (of the student and his parents or legal guardians)	• Performance of a contract with you or to taking steps at your request before entering into a contract
• to provide the functionalities of the Platform so that Online Courses can be administered on it	• date of birth of student	• Necessary to comply with our legal and regulatory obligations
• connecting the students with the Tutors and other users	• details about student's registration to or participation in the Online Courses	• Necessary for our legitimate interests (record and administer our services)
• to manage registrations and attendance to the Online Courses	• account details, such as username, login details	• Your consent (when none of the above applies)
• manage payments, fees and charges	• images of student provided by parents or legal guardians	

What we use personal information for	Type of information	Lawful basis for processing
• collect and recover money owed to us	• payment details	
To run, administer and protect our business, including:		
• Ensuring business policies are adhered to	• name, address and contact details	• Necessary to comply with our legal and regulatory obligations
• operational reasons, such as improving efficiency, training and quality control	• details about student's registration to or participation in the Online Courses	• Necessary for our legitimate interests (for running, administering and protecting our business and our rights))
• preventing and detecting fraud	• account details, such as username, login details	
• preventing unauthorised access and modifications to systems	• payment details	

What we use personal information for	Type of information	Lawful basis for processing
• statistical analysis to help us manage our business, e.g. in relation to our financial performance, customer base, product range or other efficiency measures	• any content or information you make public while using our website	
• Ensuring safe working practices, staff administration and assessments	• information about how you use our website	
To manage our relationship with you which will include:		
• Notifying you about changes to how we operate our business or the way we deal with you	• name, address and contact details (of the student and his parents or legal guardians)	• Performance of a contract with you or to taking steps at your request before entering into a contract
• Updating the information we have about you	• date of birth	• Necessary to comply with our legal and regulatory obligations

What we use personal information for	Type of information	Lawful basis for processing
• Asking you to leave a review or take a survey	• details about student's registration to or participation in the Online Courses	• Necessary for our legitimate interests (to inform you about our business, keep our records updated and to study how customers use our services)
• Responding to any questions you may have or providing any assistance that you may require	• account details, such as username, login details	
	• details of any communication you have with us or feedback you give us	
Gathering and providing information and making filings required by law or relating to audits, enquiries or investigations by regulatory bodies or authorities		

What we use personal information for	Type of information	Lawful basis for processing
	• name, address and contact details (of the student and his parents or legal guardians)	• Necessary to comply with our legal and regulatory obligations
	• date of birth	• Necessary for our legitimate interests (for protecting our rights and defending ourselves in the context of audits, enquiries or investigations administration)
	• details about student's registration to or participation in the Online Courses	
	• payment details	
External audits and quality checks		
	• name, address and contact details (of the student and his	• Necessary to comply with our legal and regulatory obligations

What we use personal information for	Type of information	Lawful basis for processing
	parents or legal guardians)	
	• details about student's registration to or participation in the Online Courses	• Necessary for our legitimate interests (for maintaining our accreditations and operating at the highest standards)
	• details about student's registration to or participation in the Online Courses	
	• payment details	
To improve our website, services, marketing, customer relationships and experiences		
	• details of any communication you have with us or feedback you give us	• Necessary for our legitimate interests (to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

What we use personal information for	Type of information	Lawful basis for processing
	• your preferences in receiving marketing from us and our third parties and your communication preferences	

The above table does not apply to special categories of personal information, which we will usually only process with your explicit consent (unless the law allows to do so without it).

We will only use personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

7. Marketing communications

We may use your personal information to send you updates (by email, text message, telephone or post) about the available Online Courses and content, including exclusive offers, promotions or new packages. We will not send such communications to students directly but only to their parents, at the contact details provided by them when creating an account with us.

We rely on your consent to send you marketing communications and we will ask for this consent separately and clearly.

Where you have provided your consent for marketing communications, you have the right to withdraw it at any time by:

- emailing, calling or writing to us—see below: ‘**How to contact us**’;
- using the ‘unsubscribe’ link in emails.

We will always treat personal information with the utmost respect and never share it for marketing purposes with other organisations.

8. Who we share your personal information with

We routinely share personal information with:

- tutors who organise and administer Online Courses on the Platform (**Tutors**);
- service providers such as third parties we use to help deliver our services to you, including website hosts and cloud providers; and
- professional advisers including lawyers, consultants and auditors who provide legal, consultancy and auditing services to us.

We only allow third parties to handle your personal information if we are satisfied they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers to ensure they can only use your personal information to provide services to us and to you.

We may disclose and exchange information with law enforcement agencies, authorities and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a restructuring. Usually, information will be anonymised but

this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

9. Where your personal information is held

Information may be held at our offices and those of our group companies, Tutors, third party agencies, service providers, representatives and agents as described above (see above: **'Who we share your personal information with'**).

Some of these third parties may be based outside the European Economic Area. For more information, including on how we safeguard your personal information when this occurs, see below: **'Transferring your personal information out of the EEA'**.

10. How long your personal information will be kept

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

We will usually keep your personal information while you have an account with us or we are providing services to you. Thereafter, we will keep your personal information for as long as is necessary:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you in accordance with the law; and
- to keep records required by law. For example, we have to keep basic information about our financial transactions with our customers for six years after the year in which they take place for tax purposes.

Different retention periods apply for different types of personal information. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and

the applicable legal requirements.

We will not retain your personal information for longer than necessary for the purposes set out in this policy. When it is no longer necessary to retain your personal information, we will delete or anonymise it.

11. Transferring your personal information out of the EEA

To manage our website and the Platform and deliver our services to you, it is sometimes necessary for us to share your personal information outside the European Economic Area (**EEA**), e.g.:

- with our service providers located outside the EEA. To receive a list of such providers please contact us (see '**How to contact us**' below);
- with other members of our group outside the EEA. To receive a list of such entities please contact us (see '**How to contact us**' below)];
- with event organisers and hosts located outside the EEA. To receive a list of such entities please contact us (see '**How to contact us**' below)];
- if you are based outside the EEA; and
- if a Tutor is based outside the EEA.

These transfers are subject to special rules under European data protection law.

Whenever we transfer your personal information out of the EEA, we ensure a degree of protection similar to that afforded in EEA countries is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will transfer your personal information to countries that have been deemed to provide an adequate level of protection for personal information by the European Commission.
- Where we transfer your personal information to countries that have not been deemed to provide an adequate level of protection for personal information by the European

Commission, we may use specific contracts approved by the European Commission which give personal information the same protection it has in Europe.

If you would like further information please contact us (see 'How to contact us' below).

12. Your rights

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

Access	The right to be provided with a copy of your personal information.
Rectification	The right to require us to correct any mistakes in your personal information. This enables you to have any incomplete or inaccurate information we hold about you corrected, though we may need to verify the accuracy of the new information you provide to us.
To be forgotten	The right to require us to delete your personal information (in certain circumstances). This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal information to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
Restriction of processing	The right to require us to restrict processing of your personal information (in certain circumstances). This enables you to ask us to suspend the processing of your personal information in the following scenarios: (a) if you want us to establish the information's accuracy, (b) where our use of the

	information is unlawful but you do not want us to erase it, (c) where you need us to hold the information even if we no longer require it as you need it to establish, exercise or defend legal claims, or (d) you have objected to our use of your information but we need to verify whether we have overriding legitimate grounds to use it.
Data portability	The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party. This right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
To object	The right to object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal information for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
Not to be subject to automated individual decision-making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you.
Withdraw consent	The right to withdraw consent at any time where we are relying on consent to process your personal information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

For further information on each of those rights, including the circumstances in which they apply, please contact us or visit the website of the Commissioner for the Protection of Personal Data (www.dataprotection.gov.cy).

If you would like to exercise any of those rights, please:

- email, call or write to us—see below: **‘How to contact us’**;
- let us have enough information to identify you;
- let us have proof of your identity; and
- let us know what right you want to exercise and the information to which your request relates.

You will not have to pay a fee to access your personal information or to exercise any of the other rights. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

13. Keeping your personal information secure

We have appropriate security measures to prevent personal information from being accidentally lost or used or accessed unlawfully. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

14. How to complain

We hope that we can resolve any query or concern you may raise about our use of your information.

The GDPR also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in Cyprus is the Commissioner for Personal Data Protection who can be contacted at 1 Iasonos street, 2nd floor, 1082 Nicosia; tel: 22818456; fax: 22304565; email: commissioner@dataprotection.gov.cy; www.dataprotection.gov.cy.

15. Changes to this privacy policy

This privacy policy was published on <https://www.kodland.org/>. We may change this privacy policy from time to time. When we do we will post the updated privacy policy on our website and we will also inform you via email if you are on our mailing list.

16. How to contact us

Please contact us by post, email or telephone if you have any questions about this privacy policy or the information we hold about you.

Our contact details are shown below:

68 CIRCULAR ROAD

#02-01

SINGAPORE (049422)

Email: Social@kodland.org Tel: +44 (208) 089-77-65