

## adaplo PRIVACY POLICY

### 1.0 OUR CORE BELIEFS REGARDING USER PRIVACY AND DATA PROTECTION

- User privacy and data protection are human rights
- We will never sell, rent or otherwise distribute or make public your personal or advertising information

### 2.0 RELEVANT LEGISLATION

The privacy policy you are reading applies for domains of adaplo.com, app.adaplo.com and grader.adaplo.com.

Along with our business and internal computer systems, this website is designed to comply with the following national and international legislation with regards to data protection and user privacy:

- [EU General Data Protection Regulation 2018 \(GDPR\)](#)

This site's compliance with the above legislation, all of which are stringent in nature, means that this site is likely compliant with the data protection and user privacy legislation set out by many other countries and territories as well. If you are unsure about whether this site is compliant with your own

country of residences' specific data protection and user privacy legislation you should contact our data protection officer for clarification.

### **3.0 PERSONAL INFORMATION THAT THIS WEBSITE COLLECTS AND WHY WE COLLECT IT**

This website collects and uses personal information for the following reasons:

#### **3.1 Site visitation tracking**

Like most websites, this site uses Google Analytics (GA) to track user interaction. We use this data to determine the number of people using our site, to better understand how they find and use our web pages and to see their journey through the website.

Although GA records data such as your geographical location, device, internet browser and operating system, none of this information personally identifies you to us. GA also records your anonymised computer's IP address which can't be used to personally identify. We consider Google to be a third party data processor.

GA makes use of cookies, details of which can be found on [Google's developer guides](#). For your information our website uses the analytics.js implementation of GA.

Disabling cookies on your internet browser will stop GA from tracking any part of your visit to pages within this website.

In addition to Google Analytics, this website may collect the IP address of the computer or device that is being used to access it in servers existing on Google Cloud Platform. No other PII are collected.

### 3.2 Email newsletter

If you choose to join our email newsletter, the email address that you submit to us will be forwarded to [MailChimp](#) who provide us with email marketing services. We consider MailChimp to be a third party data processor. The email address that you submit will not be stored within this website's own database or in any of our internal computer systems.

Your email address will remain within MailChimp's database for as long as we continue to use MailChimp's services for email marketing or until you specifically request removal from the list. You can do this by unsubscribing using the unsubscribe links contained in any email newsletters that we send you or by **requesting removal via email**. When requesting removal via email, please send your email to us using the email account that is subscribed to the mailing list.

If you are under 16 years of age you **MUST** obtain parental consent before joining our email newsletter.

While your email address remains within the MailChimp database, you will receive periodic (approximately one per month) newsletter-style emails from us.

### **3.3 Your account on app.adaplo.com**

If you registered on our product that exists under app.adaplo.com the email address that you submit to us will be forwarded to [intercom](#) who provide us with email services. We consider intercom to be a third party data processor. The information you submit on our application is stored within this website's own database, so you can have access.

Your email address will remain within intercom's database for as long as we continue to use intercom's services for email or until you specifically request removal from the list. You can do this by unsubscribing using the unsubscribe links contained in any communication through intercom that we send you or when you deactivate your account.

### **3.3 Your account on grader.adaplo.com**

When requesting a report through grader.adaplo.com the email address that you submit to us will be forwarded to [intercom](#) who provide us with email services in order to send you the report and provide the option to delete and view the information that we keep for you. We consider intercom to be a third party data processor . The PII you submit on grader.adaplo.com is stored within this website's own database, in case we need to contact you for marketing purpose if and only if you provide us with your consent.

## 4.0 HOW WE STORE YOUR PERSONAL INFORMATION

When you submit your information through forms of app.adaplo.com or grader.adaplo.com some personal information will be stored within this website's database. This is currently the only occasion where personal data will be stored on this website. This data is currently stored in an identifiable fashion. In the near future we aim to change the storage of this data to a pseudonymous fashion meaning that the data would require additional processing using a separately stored 'key' before it could be used to identify an individual.

Pseudonymisation is a recent requirement of the GDPR which many web application developers are currently working to fully implement. We are committed to keeping it as a high priority and will implement it on this website as soon as we are able to.

## 5.0 ABOUT THIS WEBSITE'S SERVER

The website of adaplo.com is currently hosted by [Google Cloud Platform](#)

The website of app.adaplo.com is currently hosted by [Amazon Web Services](#).

The website of grader.adaplo.com is currently hosted by [Amazon Web Services](#).

All traffic (transferral of files) between this website and your browser is encrypted and delivered over [HTTPS](#).

## 6.0 OUR THIRD PARTY DATA PROCESSORS

We use a number of third parties to process personal data on our behalf. These third parties have been carefully chosen and all of them comply with the legislation set out in [section 2.0](#).

- Google ([Privacy policy](#))
- Mailchimp ([Privacy policy](#))
- Intercom ([Privacy policy](#))

## 7.0 DATA BREACHES

We will report any unlawful data breach of this website's database or the database(s) of any of our third party data processors to any and all relevant persons and authorities within 72 hours of the breach if it is apparent that personal data stored in an identifiable manner has been stolen.

## 8.0 DATA PROTECTION OFFICER

This document contains details related to Data Protection Officer (DPO).  
The current DPO for adaplo is Ioannis Pelelis (john@adaplo.com).  
Telephone: +30 210 808 3261

## **9.0 CHANGES TO OUR PRIVACY POLICY**

This privacy policy may change from time to time inline with legislation or industry developments. We will not explicitly inform our clients or website users of these changes. Instead, we recommend that you check this page occasionally for any policy changes. Specific policy changes and updates are mentioned in the change log below.

### **9.1 Change log**

#### **2018-05-24 – version 1.1**

- Added details for GDPR

#### **2018-04-12 – version 1.0**

- Privacy policy instigated

