

## **Privacy Policy ECHO SCHOOL SRL**

Data protection is very important to us. We value your privacy and private life. Therefore, we will inform in the following about the processing of personal data when you use the services within the online applications as well as the internal processing activities provided by ECHO SCHOOL SRL (ECHO SCHOOL OF TECHNOLOGY, DIGITAL ARTS AND VIDEO GAMES).

As operator, ECHO SCHOOL SRL (ECHO SCHOOL OF TECHNOLOGY, DIGITAL ARTS AND VIDEO GAMES), here in after referred to as ECHO SCHOOL or the Organization, is a Romanian legal entity, with registered office in Bucharest, sector 3, București, Piața Charles De Gaulle nr.15, et. 10, cam 6 si 7, sector 1, cod postal 011857 registered J40/15445/22.08.2023, fiscal Code 48658184.

Our organization is responsible for compliance with the provisions of the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals about the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC, abbreviated to GDPR).

This Privacy Policy describes the categories of your data that are processed by ECHO SCHOOL SRL, how and for what purposes ECHO SCHOOL SRL collects it, under what circumstances collected personal data are transferred and/or disclosed, and the various rights and choices available to you in this regard.

You can also access the Video Surveillance Policy, where you can find information about how ECHO SCHOOL SRL process your personal data when you visit one of ECHO SCHOOL SRL locations.

Usually, the website can be used without entering personal data. If there is, however, such collection through this website, this process is since the data subject provides this data willingly. Such an assumption exists when, for example, the data subject applies to participate in events hosted by ECHO SCHOOL SRL or to apply to the licensing program made available by ECHO SCHOOL SRL.

ECHO SCHOOL SRL's privacy policy applies to any visitor/user of the website as well as to any personal data processed by ECHO SCHOOL SRL.

To the extent that you do not want your personal data to be processed by ECHO SCHOOL SRL please do not to access our website, not to register or not to send us documents/information containing personal data.

ECHO SCHOOL SRL data protection practices comply with applicable law. However, if for any reason the terms set out in this data protection policy are not acceptable to you, you may notify us of your objection at [info@echo-school.ro](mailto:info@echo-school.ro).

### **What personal data we collect?**

Personal data refers to all data relating to you personally. This generally includes identification data and personal characteristics (first name, last name, CNP, nationality, home mailing address, e-mail address phone number, data that may result from social media profiles such as Facebook, LinkedIn, Instagram, YouTube etc.), electronic identification data (identifiers from various applications, IP, Skype ID,

Facebook ID, Instagram, etc.), financial data for scholarships and possibly financial data to see if they fall into the scholarship category -for example, financial data on parents' situation may be requested), information on educational history (details of institutions attended, year of graduation from high school, profile followed, high school graduated, average of baccalaureate, year of graduation from baccalaureate, as well as the rest of the education information requested through the application form to the bachelor program made available by ECHO SCHOOL SRL -as far as an interested person wants to participate in it) or professional history (details of professional history, professional experience: to the extent that you wish to apply to participate in the recruitment process for a position within ECHO SCHOOL SRL, the personal data provided by you to apply for this position will be processed by us for the purpose of identifying suitable candidates), data on family members (information on parents or guardians) to be involved when necessary, image and voice: if you visit the faculty premises, participate in online interviews through dedicated tools (Zoom, Teams), respectively if you participate in our events or apply to the degree program;

Information made available by you to ECHO SCHOOL SRL for the purpose of participating in the study program will be transferred primarily to other entities within a ECHO SCHOOL SRL group – to the extent and for the purpose of fulfilling ECHO SCHOOL SRL's business purpose. Your personal data may also be shared with external entities; more details about this type of sharing will be found hereunder.

To guarantee the security of the transmission and processing of these data, a collective DPA (Data Protection Agreement) has been concluded, signed and assumed by each of the parties of the ECHO SCHOOL SRL group.

### **What processing of personal data means?**

Processing of your personal data means any operation or set of operations which is performed upon personal data or upon sets of personal data, whether by automatic means, such as collection, recording, organizing, structuring, storing, adapting or altering, extraction, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction. Therefore, whenever personal data provided by you, or on your behalf, is collected and then used in various ways, ECHO SCHOOL SRL may assume that processing of your personal data is taking place.

### **Who is processing your personal data?**

Within the limits of the purposes and means of processing of personal data declared under the GDPR, ECHO SCHOOL SRL fulfills the role of controller by processing personal data received from individuals who make use of the services and facilities ECHO SCHOOL SRL offers. In the same way, ECHO SCHOOL SRL is the entity that establishes the framework and rules for processing. In this context, it ensures the compliance of ECHO SCHOOL SRL's processing activity with the rules imposed by the GDPR, for the safety of those who entrust their personal data to fulfill certain purposes.

ECHO SCHOOL SRL also works with processors acting as the controller, i.e., persons who evaluate applications for participation in the subsidy program and/or support pedagogical activities or consultants and/or collaborators in the ECHO SCHOOL SRL team who dedicate their work to the purpose of fulfilling ECHO SCHOOL SRL's business. They will only process the personal data collected with the consent of the ECHO SCHOOL SRL controller, within the limits and under the conditions imposed by the ECHO SCHOOL SRL controller.

### **From whom and how does ECHO SCHOOL SRL collect personal data?**

As ECHO SCHOOL SRL website being used by various groups of people, ECHO SCHOOL SRL may collect personal data from the following: prospective students for all our programs, students & alumni, prospective employees, and general users of the website. The information is collected via contact forms, event registration forms and with cookies.

As a rule, ECHO SCHOOL SRL collects and processes the data that website users or prospective students/potential candidates and their parents/guardians freely choose to provide. ECHO SCHOOL SRL may also process personal data of individuals who, at some point in time, have been interested in an event organized by ECHO SCHOOL SRL or have been interested in receiving news about ECHO SCHOOL SRL work, have participated in an event organized by ECHO SCHOOL SRL, or of individuals applying for a position within ECHO SCHOOL SRL.

ECHO SCHOOL SRL collects and processes personal data that users/visitors make available to ECHO SCHOOL SRL, by accessing and visiting the website, by registering for its events, by filling in the forms provided by ECHO SCHOOL SRL -on line or offline- by contacting the faculty, through one of the methods made available to you (chat, telephone, e-mail) or from public sources.

It is also possible that third parties acting as providers of applications, tools, widgets, and plug-ins on our website may use automated means of collecting data about your interaction with those platforms. In this situation, the data is collected directly by those providers, which means that in connection with the collection of data by those providers, individuals whose data is processed by those providers should consult the data protection policies and information notices of those providers as the providers' policies apply to that processing. Subject to applicable law, ECHO SCHOOL SRL is not responsible for the data protection practices of these providers.

In addition, ECHO SCHOOL SRL may use third party analytics services on the website, such as Google Analytics. Vendors that administer these services use technologies such as cookies, web server logs and web beacons to help us analyze how you use our website. Data collected through these means (including IP addresses) may be passed on to these providers or other relevant third parties who use this data, for example, to evaluate website usage.

Why does ECHO SCHOOL SRL collect your personal data and what is it used for?

ECHO SCHOOL SRL collects data for the following specific purposes: administration, providing services, giving information, authorizing access, and tracking how the website is used.

The personal data that is being collected from prospective students, students and alumni concerns all the above listed purposes. It is important for ECHO SCHOOL SRL to administrate the personal data of these groups because of the internal operational processes. The processing is done only for the following purposes:

- Education programs: giving advice to prospective students about programs, applying for a program, contacting prospective students and accreditation purposes, completion of the pre-selection process for admission to ECHO SCHOOL SRL and providing the ECHO SCHOOL SRL educational offer sending newsletters and other emails to prospective students. To deal with any requests and/or complaints requested by you regarding the educational program; Authorizing alumni to access the Alumni Networker and the Alumni Library, sending newsletters and other emails to alumni.

- For tracking the use of our website, your IP address and time spent on the website will be saved. However, this data is anonymous. This data is collected for ECHO SCHOOL SRL to improve the website and external communication.
- To better organize logistics for the events at which you are to participate.
- To send newsletters and marketing information if you show additional interest and only if you have consented to us doing so.
- To better understand how people interact with our lecturers. Informing you about ECHO SCHOOL SRL activities and actions.
- To better understand how to improve our Programs, services, and communications to you.
- Evaluation of events organized by ECHO SCHOOL SRL.
- Complying with the ECHO SCHOOL SRL's legal obligations (such as record-keeping and archiving obligations);
- Protecting security and managing access to our premises, IT and communication systems, online platforms, website, and other systems.
- For the purposes of monitoring and evaluating compliance with our policies and standards.
- If you have applied for a position within our entity, the data you have provided is necessary to identify whether your professional experience and training are suitable for the position for which you have applied.
- To promote the Association's activities and communicate with you to keep you informed about ECHO SCHOOL SRL, announcements and other information about the Organization's educational offerings, as well as ECHO SCHOOL SRL events and projects.
- For any purpose related and/or ancillary to any of the above or any other purpose for which your personal data has been provided to us. By registering for an event, you are accepting and consenting that we may use your image in case the pictures enclosing you are relevant to us and published on our media channels: Facebook page, LinkedIn page, design materials and website and other channels. If you have expressly given us your consent, we may also process your personal data for the purpose of promoting the actions carried out in your events, in relation to your image.

If you send an email to ECHO SCHOOL SRL's general email account ([info@echo-school.ro](mailto:info@echo-school.ro)), your email including email address will be forwarded to the concerned team/department. Your email address will only be used for replying to your email.

If you are on the ECHO SCHOOL SRL mailing list, you will receive monthly newsletters. You can always unsubscribe to these newsletters. This also applies to all the other mailing lists.

ECHO SCHOOL SRL will not use your personal data to make automated decisions that affect you or create profiles other than those described above.

### **What are the legal grounds of processing your data?**

Any operation that constitutes processing of personal data under the law (such as, but not limited to, collection, storage, recording, structuring, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, destruction) of your personal data will only be carried out on one of the following legal grounds:

1. The processing is necessary for entering into and/or observing a contract with you – for enrolment in ECHO SCHOOL SRL courses or for employment in our organization.
2. The processing is necessary for the purposes of ECHO SCHOOL SRL's legitimate interests unless your interests or fundamental rights and freedoms are overridden by those interests. Specifically, regarding the processing of your image when you visit the faculty premises, the data is processed based on ECHO SCHOOL SRL's legitimate interest to protect its assets and prevent theft and abuse on the faculty premises in Bd Dacia 99 Sector 2 Bucharest and to protect the integrity of students attending classes.
3. The processing is necessary for the purposes of ECHO SCHOOL SRL's legitimate interests to promote its activities and actions to achieve ECHO SCHOOL SRL's objectives.
4. The processing is carried out on the basis of your prior and explicit consent, in the case of photographs taken at our events, expressed when registering for the event, by means of a form completed in advance.

### **With whom do we share your personal data?**

ECHO SCHOOL SRL may share personal data only in the following circumstances:

ECHO SCHOOL SRL may share personal data with courts, law enforcement authorities, regulators or attorneys or other persons if it is reasonably necessary for the establishment, exercise, or defense of legal claims.

ECHO SCHOOL SRL may use aggregated personal data and statistics for the purpose of monitoring the use of ECHO SCHOOL SRL websites.

ECHO SCHOOL SRL may also share personal data with ECHO SCHOOL SRL associated entities (affiliated entities, founding organizations, partners in the conduct of the educational program, ECHO SCHOOL SRL group), as well as with proxy companies – mainly service providers within or outside ECHO SCHOOL SRL (providers for various services, such as website administration and hosting services, educational platform administration and hosting services, advertising services, financial, legal, accounting consulting services) for the purpose of processing personal data for the purposes mentioned above, on behalf of ECHO SCHOOL SRL and only in accordance with ECHO SCHOOL SRL instructions. ECHO SCHOOL SRL will retain control over your personal data and will use appropriate safeguards, as required by applicable law, to ensure the integrity and security of your personal data at the time of your request to those service providers. Also, we would like to point out that in ECHO SCHOOL SRL's business, data will be transferred to two entities in particular: Amber Studio (co-founder partner) (<https://www.amberstudio.com>) and Abertay University (academic partner) (<https://www.abertay.ac.uk>). ECHO SCHOOL SRL also reserves the right to transfer your personal data in the event of transfer of assets or parts of assets to third parties in compliance with the legal provisions in force regarding the processing of personal data.

Data collected through third party plug-ins and widgets on the sites (such as JotForm, Google Form) are collected directly by the plug-in and widget providers. These data are subject to the data protection policies of the respective providers and ECHO SCHOOL SRL has no liability for the data processing by them.

Otherwise, ECHO SCHOOL SRL will only disclose your personal data when you instruct ECHO SCHOOL SRL or give ECHO SCHOOL SRL permission, when ECHO SCHOOL SRL are required by applicable law or regulations or requests of judicial or official bodies to do so, or as necessary to investigate fraudulent or criminal activity.

**Your personal data will not be transferred to third parties or partners for direct marketing purposes.**

How do we keep your personal data safe and how long do we keep it?

It is important for ECHO SCHOOL SRL to keep your personal data private, safe, and protected.

Therefore, the data is stored in secure servers and protected by other security measures, such as firewalls.

Your personal data will not be kept longer than needed, according to Article 5, section 1c of the GDPR.

This means ECHO SCHOOL SRL will delete your personal data if there is no purpose for it anymore.

Except when your anonymized data could serve as input for statistical purposes or needs to be saved based on compulsory retention period.

**Cookies**

ECHO SCHOOL SRL also collect information when you visit [www.ECHO SCHOOL SRL.com](http://www.ECHO SCHOOL SRL.com) using cookies (“session cookies” and “persistent cookies”) to help us identify you when you visit our websites: [www.ECHO SCHOOL SRL.ro](http://www.ECHO SCHOOL SRL.ro) and to share cookies with advertisers or third-party advertising networks.

Please also refer to our Terms and Conditions available at the website address inserted in the previous paragraph and the Cookie Policy detailed therein, which explains the use of cookies/other web tracking devices through our platform.

The ECHO SCHOOL SRL website uses cookies; a simple and small text file that will be automatically placed on your device as soon as you use our website. These cookies guarantee that the website works properly. You will get a pop-up message about the cookies when you visit ECHO SCHOOL SRL ’s website and they will be installed when you use the website.

**Updating this privacy statement**

ECHO SCHOOL SRL can always update this privacy statement according to new laws, legislation and/or work procedures. This privacy statement was last updated and is effective as of 30 September 2023.