



## **Act Sustainably, Act for the Planet (ASAP) Platform Privacy Policy**

### **Privacy policy**

The Owner is committed to protecting users' privacy and personal data when accessing and using the Act Sustainably, Act for the Planet (ASAP) platform. This privacy policy explains how the Owner collects, uses, protects, and shares personal data.

By using ASAP, users agree to the terms of this policy.

This document can be printed for reference by using the print command in the settings of any browser.

### **Owner and Data Controller**

ActionAid

### **Purpose and Scope of Data Collection**

The Data concerning the User is collected to allow the Owner to provide and improve its Service, ensure an optimal user experience, send important notifications related to the User's account, learning activities, or updates from the system, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following: Analytics, Platform services and hosting and Spam and bots protection.

For specific information about the Personal Data used for each purpose, the User may refer to the section "Detailed information on the processing of Personal Data".

### **Types of Data collected**

The Personal Data collected includes, but is not limited to:

- Basic personal information: Full name; Date of Birth; Gender (Female/ Male/ Other); Phone Number; Email address. Location (Country, Province/city), School. Profile picture.
- Activity information: Information about enrolled courses, learning progress, exam results, access history, and other interactions within the system.
- Technical information: IP address, browser type, device used, and operating system.
- Additional information: Any information you provide during your interaction with the support team.

Among the types of Personal Data that ASAP collects, by itself or through third parties, there are: Trackers; Usage Data; number of Users; session statistics; device information; geography/region; answers to questions; clicks; keypress events; motion sensor events; mouse movements; scroll position; touch events.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or in specific explanation texts displayed prior to the Data collection. Personal Data may be freely provided by the User, or, in the case of Usage Data, collected automatically when using ASAP.

Unless specified otherwise, all Data requested by ASAP is mandatory and failure to provide this Data may make it impossible for ASAP to provide its services. In cases where ASAP specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service. Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

### **Additional information about User's Personal Data**

In addition to the information contained in this privacy policy, ASAP may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

### **Methods of Data Collection**

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT-enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of ASAP (administration, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. An updated list of these parties may be requested from the Owner at any time.

The Personal Data is collected through:

- Account registration: When the User registers for an account on ASAP, they will provide information such as full name; date of birth; gender; phone number; and email address. Location, and other details.
- Usage process: Information about the User's learning activities, access history, and interactions with the system will be automatically recorded.
- Support contact: If users contact us for support, the Owner may collect the information you provide during this process.

Cookies and tracking technologies: the Owner uses cookies and similar technologies to track the User's activity on ASAP to improve user experience and collect statistical data. Any use of Cookies – or other tracking tools – by ASAP or by the owners of third-party services used by ASAP serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy.

The Users are responsible for any third-party Personal Data obtained, published, or shared through ASAP.

## **Place**

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located. Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing such transferred Data, the Users can check the section containing details about the processing of Personal Data.

## **Data Retention Period**

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the User's consent to:

- Provide the services requested.
- Fulfill legal obligations, such as retaining financial records or complying with legal requirements.
- Protect the interests of The Owner in the event of disputes.

Once no longer needed, personal data will be securely deleted or anonymized to ensure that User identity cannot be re-identified.

## **Further information about retention time**

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the User's consent.

Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the Owner's legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to fulfill a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right to access, the right to erasure, the right to rectification, and the right to data portability cannot be enforced after the expiration of the retention period.

## **Detailed information on the processing of Personal Data**

Personal Data is collected for the following purposes and using the following services:

- Service provision: Performing basic functions such as account management, accessing courses, and user support.
- Enhancing experience: Personalizing displayed content and improving system functionality.

- Research and development: Analyzing data to improve service quality and develop new features.
- Sending notifications and bots protection: Notifying about courses, learning outcomes, important changes in the system, and special offers. Anticipating bots and providing protection.
- Legal compliance: Complying with legal regulations or requests from authorities.

### **Additional information about Data collection and processing Legal action**

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of ASAP or the related Services. The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

### **Cookie Policy**

ASAP uses cookies and similar tracking technologies to:

- Remember the User's preferences and enhance user experience.
- Collect statistical data for analysis and to improve system performance.
- Support advertising

Users can customize their browser settings to refuse cookies or receive notifications when cookies are used. However, refusing cookies may affect their experience while using ASAP.

### **Further Information for Users**

#### **Legal basis of processing**

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes.
- Provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- Processing is necessary for compliance with a legal obligation to which the Owner is subject;
- Processing is related to a task that is carried out in the public interest or the exercise of official authority vested in the Owner;
- Processing is necessary for the purposes of the legitimate interest pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

### **Sharing Personal Data**

The Personal Data is committed to not selling, exchanging, or sharing with third parties except in the following cases:

- With the User consent: the Owner will only share user personal data with the user's explicit consent.

- Service provision: The Owner may share information with service providers or partners to perform functions related to the system (e.g., data storage, email sending).
- Legal compliance: Regarding requests from authorities or legal requirements, the Owner will provide information as required.
- Protecting rights: When necessary to protect our legal rights, the rights of the Users, or third-party interests.

### **Data Security**

The Owner is committed to implementing advanced security measures to protect your personal information from risks such as unauthorized access, loss, or misuse. These measures include:

1. Data encryption: Personal data is encrypted when stored and transmitted over the internet to ensure security.
2. Firewalls and monitoring: The system is protected by firewalls and monitoring tools to detect and prevent unauthorized intrusion attempts.
3. Access control: Only authorized personnel may access personal information, and only as necessary to perform their duties.
4. Data backup: Data is regularly backed up to ensure recovery in case of incidents.
5. Security audits: Regular security checks and updates are conducted to address new threats.

While the Owner strives to protect your personal information, no system can guarantee absolute security. Therefore, users should also protect their account information by using a strong password and not sharing their login information with others.

### **The Rights of Users**

The Users may exercise certain rights regarding their Data processed by the Owner.

Particularly, the Users have the right to do the following, to the extent permitted by law:

- Right of Access: the Users have the right to request access to the personal data collected. Users have the right to learn if the Owner is processing data, obtain disclosure regarding certain aspects of the processing, and obtain a copy of the Data undergoing processing.
- Right to Withdraw: The Users have the right to withdraw their consent at any time. The Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- Right to Object: The Users have the right to object to the use of your personal information for marketing or other purposes not directly related to the service and the processing of their Data if the processing is carried out on a legal basis other than consent.
- Right to Verify and seek rectification: The Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- Right to Restrict the Processing of their Data: The Users have the right to restrict the Processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- Right to Erasure: The Users have the right to obtain the erasure of their Data from the Owner.

- Right to Data portability: Upon request, the Owner will provide a copy of the User's data in electronic format for transfer to another system and/or controller. Users have the right to receive their Data in a structured, commonly used, and machine-readable format and, if technically feasible, to have it transmitted to another controller without any hindrance.
- Right to Complain: The Users have the right to bring a claim before their competent data protection authority.

The Users are also entitled to learn about the legal basis for Data transfers abroad including to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

To exercise these rights, please contact the Owner via email: [ha.chuthi@actionaid.org](mailto:ha.chuthi@actionaid.org).

The Owner commits to processing the User's request within 15 working days.

### **Details about the right to object to processing**

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner, or for the legitimate interest pursued by the Owner, the Users may object to such processing by providing a ground related to their particular situation to justify the objection.

The Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time, free of charge and without providing any justification. Where the User objects to processing for direct marketing purposes, the Personal Data will no longer be processed for such purposes. To learn whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

### **How to exercise these rights**

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. Such requests are free of charge and will be answered by the Owner as early as possible and always within one month, providing Users with the information required by law. Any rectification or erasure of Personal Data or restriction of processing will be communicated by the Owner to each recipient, if any, to whom the Personal Data has been disclosed unless this proves impossible or involves disproportionate effort. At the Users' request, the Owner will inform them about those recipients.

### **System logs and maintenance**

For operation and maintenance purposes, ASAP and any third-party services may collect files that record interaction with ASAP (System logs) or use other Personal Data (such as the IP Address) for this purpose.

### **Information not contained in this policy.**

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

### **Changes to this privacy policy**

The Owner reserves the right to make changes to this privacy policy at any time by notifying its Users on this page and possibly within ASAP and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed based on the User's consent, the Owner shall collect new consent from the User, where required.

### **Definitions and legal references Personal Data (or Data)**

Any information that is directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

### **Usage Data**

Information is collected automatically through ASAP (or third-party services employed in the ASAP), which can include: the IP addresses or domain names of the computers utilized by the Users who use ASAP, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

### **User**

The individual who is using ASAP, unless otherwise specified, coincides with the Data Subject.

### **Data Subject**

The natural person to whom the Personal Data refers.

### **Data Processor (or Processor)**

The natural or legal person, public authority, agency, or other body that processes Personal Data on behalf of the Controller, as described in this privacy policy.

### **Data Controller (or the Owner)**

The natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of ASAP - The Data Controller, unless otherwise specified, is the Owner of ASAP .

### **ASAP**



The platform where the Personal Data of the User is collected and processed.

**Service**

The service provided by ASAP is described in the relative terms (if available) and on this site/application.

**Cookie**

Cookies are Trackers consisting of small sets of data stored in the User's browser.

**Tracker**

Tracker indicates any technology - e.g. Cookies, unique identifiers, web beacons, embedded scripts, e-tags, and fingerprinting - that enables the tracking of Users, for example by accessing or storing information on the User's device.

**Legal information**

This privacy policy relates solely to ASAP if not stated otherwise within this document.