

# **Data privacy policy**

The following statement provides a simple overview of how your data is handled when interacting with the school innovation platform <u>innovationhub.school</u>.

# 1. Data protection at a glance

- innovationhub.school is based in Germany. We operate in accordance with the provisions of the EU General Data Protection Regulation (GDPR).
- We are guided primarily by the principles of data avoidance and data economy (privacy-by-design).
- We collect only as much data as necessary to enable school teams to design organizational development processes collaboratively on a virtual basis and to establish a network of relevant stakeholders. Members and users have the possibility to influence the functional use and thus the visibility of their information at any time.
- We only collect data from members and users as mandatory data that is absolutely necessary to guarantee the above-mentioned functions. These are: a user name chosen by the user, an e-mail address and the name of the school, educational institution or organization.
- By registering an account, future members and users agree to the processing of this data by innovationhub.school.
- We do not sell any data of our members and users to third parties.
- Our servers are located in Germany in a data center of the trio-group communication & marketing gmbh in accordance with applicable European data protection regulations.
- Communication via innovationhub.school is SSL-encrypted by default.
- When an innovationhub.school account is deleted, all associated personal data is deleted from the server.

# 2. Scope and clarification of terms

The scope of this Privacy Policy includes the services and services of the <a href="https://live.innovationhub.school">https://live.innovationhub.school</a> platform, referred to in this statement as innovationhub.school.

The term data in this Privacy Policy refers to all data collected using our Services. This data is in your control.

The term personal information refers to information that we collect about you.

#### 3. Information we collect and how we use it

Depending on how you use innovationhub.school, we collect different information about you.

# **Groups of people**

In general, there are two groups of people who use our service:

- 1. <u>Members</u> of innovationhub.school Community: you are a member if you have a personal innovationhub.school user account to access information within the community, for example
  - Articles and discussions around school innovation
  - Training material on the innovation method
  - Good practice examples for your inspiration
  - Expertise and interest of other members for networking
- 2. <u>Users</u> of the innovation platform: You are a user if you create your own "innovation projects" for your school with your personal innovationhub.school user account in order to design and map the school development process.

Under the principle of data avoidance and data economy (privacy-by-design), we process personal data about you only to fulfill our contractual obligation to provide our services and to pursue legitimate interests in improving our services and further developing our products. Our main goal is to improve our services and content for all members and users and to ensure that your personal data is respected and protected.

# 3.1 Members

# **Device, Browser and Log Data**

We collect information about the device and application you use to access our Services. These include:

- Device type, system and performance information.
- browser type and version
- Operating system used
- host name of the accessing computer
- Time of server request
- IP address

This data is not merged with other data sources.

#### **Registration data**

You need an account on https://live.innovationhub.school/de with personal access data before you can use the services of the platform. When you create an account, we only collect a user name of your choice, your e-mail address and the name of your school, educational institution or organization.

### **Billing data**

If you request a quote or make a payment to innovationhub.school, we need your billing data such as billing address and email address of the contact person.

<sup>&</sup>quot;Users" are also considered "members" at innovationhub.school.

#### **Account Information**

We use your account information, such as your email address, user name of your choice, and association with a school, educational institution, or organization, to manage your innovationhub.school account, for example, so that you can reset your password and for customer support.

We will occasionally send you business-related communications about our services, quotes and invoices, changes in our services or policies, and a welcome email when you first register with innovationhub.school. You cannot opt out of receiving these communications as they are essential to the delivery of our services.

#### Profile data

As a community member, you have the option to create your personal profile in order to be found and contacted in the school innovation network.

If you decide to create a profile, the following data will be entered in the corresponding input mask in addition to

- your name and
- the school
- country and county and
- your function within the school

to ensure the quality of the network.

Other information such as interests, expertise, personal information, profile pictures or the publication of contact data is voluntary. You thereby increase the relevance of the network.

Without creating a personal profile, you are only visible to other members with your freely selectable user name.

#### **Activity and content data**

As a community member, you have the opportunity to participate in discussions, comment on content and create your own content (e.g. articles, good practice examples), which will be accessible and visible to the community. We store this information for lively design and mutual information within the network.

Users themselves can decide on the extent to which content is visible. This makes it possible to publish content outside the community. Online shared content can also be found by search engines. innovationhub.school has no influence on the display of search results. Therefore, please use the functionalities for sharing and publishing data and information with caution.

After deletion of your user account, your comments and content will be anonymized. By publishing content, you agree to its use on https://live.innovationhub.school independently of your personal user account.

#### **Communication data**

As a member you have the possibility to contact other members and to receive and send private messages. We store this information to facilitate your networking. Communication via innovationhub.school is SSL-encrypted by default.

You can delete your private messages yourself at any time. After deleting your user account, private messages will be deleted as well.

#### 3.2 Users

The information we collect about members also applies to users, as they also act as members after registration.

In addition, we process the following information about users:

## Project data

As a user, you have the possibility to create your own (closed) innovation projects, invite other users to collaborate in these projects, share topics and events with them in order to design and map these organizational development processes in innovationhub.school.

To provide this service for you, we store all information related to the project:

- Project title and short description, project title image.
- Assignment to given school innovation areas
- Members of the project
- Events and topics within the project

For relevant networking with other innovative schools you have the possibility to publish project title, a short description and a project title picture as well as the assignment to innovation areas of your projects in the community.

(External) school development facilitators can also be invited as members of the projects. If an accompaniment has been booked by the innovationhub.school team, an accompanist will automatically become a member of your project in order to make the accompaniment service as effective as possible.

Closed projects will be deleted after deletion of the user accounts of all project members.

In addition, you have the possibility to create (open) projects that also allow other community members to participate. These projects will remain even after deletion of your user account. Your comments will be deleted, created content will be anonymized.

#### Mapping the innovation process

For the visualized, collaborative design of the innovation process, we offer a pre-designed online collaboration whiteboard by "Miro" of RealtimeBoard Inc. based in Las Vegas, NV 89103, USA, which can be used as a "Visitor" and thus without a Miro user account.

In addition to the collection and processing of your data by innovationhub.school, RealtimeBoard Inc. also collects and processes data on its own responsibility and for its own purposes when you interact with and through the "Miro" service.

Detailed information on data collection and processing by RealtimeBoard Inc. can be found in their privacy policy. When using the Miro service via the whiteboard provided by innovationhub.school, you agree to the Miro Privacy Policy.

### **Conducting surveys**

For the creation and implementation of online surveys, we offer the service "Edkimo" of Edkimo GmbH, located in 10961 Berlin, Gneisenaustraße 7a.

In addition to the collection and processing of your data by us, Edkimo GmbH also collects and processes data on its own responsibility and for its own purposes when you interact with and through the "Edkimo" service. Detailed information on data collection and processing by Edkimo GmbH can be found in its privacy policy. By using the Edkimo service via the access provided by innovationhub.school, you agree to the Edkimo privacy policy.

#### 4. Subcontractors

To assist us in providing certain aspects of our services, we use subcontractors and trusted partners. innovationhub.school has entered into the necessary agreements within the meaning of Article 28(4) of the GDPR with the following sub-processors that process personal data to ensure that they meet our high data protection standards:

- trio-group communication & marketing gmbh (software, servers and databases).
- CDmon (e-mail hosting)
- sevDesk GmbH (accounting)

#### 5. Data retention and deletion

If you maintain an innovationhub.school account, we do not delete data contained therein, i.e. you are responsible for how long you keep this data.

# 6. Changes to the privacy policy

innovationhub.school is entitled to make changes to this Privacy Policy from time to time. In cases where such a change fundamentally alters the way we collect or use your personal information or data, we will send a notice of the change to all account holders.

# 7. Your rights

If you are a European member or user with a personal innovationhub.school account, you are entitled to a copy of all personal data we have stored about you. Furthermore, you are entitled to request a restriction of our use of your data or to object to the handling of your data by us in certain areas. Some of these rights may be subject to certain exceptions or limitations.

You can access much of your information after you log in to your account. However, if you would like to obtain a complete copy of all of your information or request a restriction or limitation on our use of your information, please contact our support team. We will respond to your request to exercise these rights within a reasonable time, but no later than 30 days of receipt.

# You have the following rights:

- Data access rights
- Right to restrict processing
- Right to rectification
- Right to erasure (the "right to be forgotten")
- Right to object to processing
- Right to withdraw consent
- Right to lodge a complaint with a supervisory authority
- Data portability rights

# 8. Contact for exercising your rights

Our contact for data protection inquiries (responsible party):

innovationhub.school Berit Moßbrugger Luther Straße 5 69120 Heidelberg Germany

Phone: +49 173 580 7618 berit@innovationhub.school