

Personal data protection policy

1. Introduction

Data protection is very important for us. We respect your privacy and personal life. Therefore, we will inform you below on the processing of personal data when you use the services within online applications and on the internal processing activities made available by EDUCATIVA Group (group meaning all the following legal entities: EDUCATIVA SRL, EDUCATIVA Group Foundation, Reviro HR SRL, Reviro Association, Universalio Consultanta SRL, Universalio EDU-Advising SRL, Universalio Consiliere Educationala SRL, FINS IFN SA, EDUCATIVA Group Ltd.). Our institutions within EDUCATIVA group are 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 natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC, abbreviated in English GDPR or in Romanian RGPD).

This personal data protection policy describes our practices on processing (activities including collection, use and potentially transfer) of data directly communicated to EDUCATIVA, as well as the use of personal data collected by organizations within the group from public sources for the purpose of providing services and our products:

- Educational consultancy for studies (international or national)
- Vocational consultancy/consultancy for personal and professional development,
- Access to informative educational events,
- Recruitment and professional placement services or
- Loan and financing products for studies.

Our data protection practices comply with applicable data protection legislation but if, for whatever reason, the terms set out in this data protection policy are not acceptable to you, you can communicate your objection at the address dpo@educativa.group.

2. Definitions

1.1 Personal Data

Personal data is all data that relates to you personally. These include identification data and personal characteristics (name, surname, Personal Identification Number (CNP), nationality, employment category, residence address, class/study year, phone number etc.), electronic identification data (identification elements from various applications, IP, Skype ID, Facebook ID etc.), details about grades, qualifications or exams previously taken (baccalaureate grade, Bachelor's Degree grade, language test grade etc.), information on educational background (details about the graduated institutions) or professional history (details about professional history), data about family members (information about parents or guardians who support and/or make recommendations) used when using the services in our locations, through call-center phone support services or our electronic environments (social media such as Facebook, Twitter and especially through the websites www.educativa.group, www.educativa.ro, www.edmundo.gr, www.edmun.do, www.edmerica.ro, www.edmundo.ro, www.hellofins.ro, www.holland-day.ro, www.hollandeducation.ro, www.maestrum.ro, www.mief.md, www.optiuni.ro, www.reviro.ro, www.riuf.ro, www.ro-win.ro, www.superteach.ro, www.universalio.ro, www.universiday.ro, or any website owned by one of the group entities).

1.2 Volume of services provided

In the following, we will describe the volume of services provided by us, based on the existing solutions available to you: relationship management systems (CRM/ERP), call-center systems, electronic systems for the collection of information provided by third parties, electronic messaging systems, and especially through websites with online registration, sign-up, communication services.

1.2.1 Basic services

In the case of the basic service, it is provided through the systems for managing the relationship with the candidate/applicant or persons empowered by him/her, of the request for consultancy or financing in the educational area. All information collected about you is strictly used for the individual purpose for which it has been collected, according to the mandate granted and/or the contracts concluded - where applicable. Our group owns other internal

operational systems to meet the requirements and provide the necessary support for the performance of the contracted services, through which we transit the information collected in order to provide the best services related to the request received.

1.2.2 Web user account

When making the user account registration (name, surname, e-mail and phone) in the application from the websites and submitting the login details related to this account, EDUCATIVA processes the data related to communication to our team for the purpose explicitly requested by you.

3. Processing of personal data in the context of using the applications made available

In the context of using the two applications, you provide us, for registration purposes and for the provision of our basic services, with the following personal data:

- identification data and personal characteristics (name, surname, Personal Identification Number (CNP), employment category, residence address, class /year of study, phone number etc.),
- electronic identification data (identification elements in various applications, IP, Skype ID, Facebook ID etc.),
- details about grades, qualifications or exams previously taken (baccalaureate grade, Bachelor's Degree grade, language test grade etc.),
- information about the educational background (details about the graduated institutions)
- professional history (details about professional history),
- data about family members (information about parents or tutors who support and/or make recommendations)

data being collected depending on the type of applicant's request, not all categories being necessary.

This data is necessary to perform the mentioned operations requested by you, according to the legislation in Romania, respectively according to the request of partners involved, universities or educational institutions in Romania or abroad (in the event of requesting consultancy for registration with those educational institutions and only if this transfer has been expressly mentioned in the instructions).

As client/applicant/participant/applicant for educational and vocational services, financial services or recruitment services, you have the option of requesting the modification, by sending it to the team of consultants, of your previously collected personal data.

EDUCATIVA does not request and does not process personal data of special categories, but only non-sensitive data necessary and relevant, unless it is legally required to do so in a subsequent stage. Data considered sensitive/with special character could be but without limitation to information on race or ethnicity, political opinions, religion, membership of trade unions, health, sexual preferences or criminal record.

EDUCATIVA allows the use of services by persons who have not reached the age of 16, thus collecting data from children/minors (pupils), but in this case it is required to confirm the provision of the requested services by their parent/guardian.

The information collected about you is not transferred to our partners or agents, your requests being transmitted without being accompanied by personal data. An exception is represented by cases of those educational institutions that specify from the beginning the obligation of the entities within the EDUCATIVA Group to transfer such data or in case the applicant (you) expressly requests the transfer of such data from us to the end-institution.

4. Processing of personal data for marketing/advertising purposes

By giving your consent regarding the receipt of information and advertising, we want to inform you about the current products, services, contests, surveys and promotions. The data provided will be used to be classified in a specific area of interest so that the information provided is relevant and useful to your request.

If you opted for a notification by mail, we will process data such as your name, surname, address.

If you opted for a notification by e-mail, we will process your e-mail address, which has been verified beforehand.

When you choose to receive notifications on your mobile phone, we will process your mobile phone number.

5. Processing of personal data for market research

We process your personal data for market research and opinion polls. For this purpose, your data will be anonymized, we will only use it for statistical purposes and cannot be correlated with you in any circumstances. You may revoke at any time this data processing, with effect for the future, without giving your reasons. For this purpose, you may choose from the modalities mentioned in the confidentiality statement (please see below).

This data processing serves to improve our goals mentioned in the confidentiality statement, especially to improve the provision of services that are more relevant for you. We respect the protection of our customers by the fact that we perform market research with anonymized data.

6. Duration of data storage

Your user data, as well as data regarding your requests will be kept for 5 years, in order to ensure continuity if after the completion of the current educational period you wish to continue or make other requests through our teams. Your basic data will be kept throughout the performance of the contract.

7. The use of service providers for processing personal data/processing data in countries outside the European Economic Area

Our organization does not use for the provision of services and the processing of your data suppliers outside the European Economic Area. If there is a need to transfer information to universities or any type of educational institution outside the European Economic Area, the potential transfer will be made only based on your explicit approval (in most cases you will be recommended to perform and control this transfer directly by you).

8. The source of personal data

Personal data can be obtained from the following sources:

- (a) directly from you when: you request registration/apply for an educational institution or university or you benefit from the educational consultancy services that we provide, or you request information when you subscribe to newsletter or other publications, send feedback, participate in contests organized by the legal entities of EDUCATIVA group,
- (b) through the activities you carry out during the period when you benefit from the consultancy services provided, such as pictures, history of conversations through the various communication channels (e-mail, social media etc.);
- (c) from third parties, such as the case when we receive your personal data from third parties requesting your recommendation for the provision of educational consultancy services (parents, guardian or even teachers)

9. Legal ground for the processing of personal data

The legal grounds of personal data processing operations described in this Notification are: (i) performing a contract you are a party to or taking steps before the conclusion of a service provision contract or consulting contract in the educational field, (ii) our legitimate interests and/or the need to conclude or perform a contract, in accordance with the legal provisions on data confidentiality and (iii) your consent.

Our legitimate interests or those of a third party include our requirements to use your personal data in litigation, authority inquiries, data processing for advertising, marketing or publicity, or for other legal purposes involving the EDUCATIVA group.

10. Data security

To prevent unauthorized access, to maintain data accuracy and ensure the correct use of data, we implement reasonable physical, IT and organizational security measures to protect effectively all personal data we process.

We take technical and organizational security measures to protect your data from unwanted access as much as possible. Besides securing the operating environment, for example, in certain areas (client account, contact form for the site) we use the encryption process. The information you provide will subsequently be transmitted in encrypted form, using Secure Socket Layer (SSL) protocol to prevent inappropriate use of data by third parties. You can identify this aspect by seeing the closed padlock symbol in your browser's status bar, and the address bar starts with "https". Data security will be adjusted according to the current technique.

11. Your rights

11.1 Right of access

You may request information from us at any time about the data stored about you, as well as, amongst other things, about the origin of the data, the recipients or categories of recipients to which the data is transmitted and about the purpose of storage. For all other copies except the first copy, reasonable administrative costs may be charged. This does not apply to the electronic communication of information.

11.2 Right of withdrawal

If you have consented to the use of data, you may withdraw it at any time with effect for the future (once the contracted services have been completed), without giving any reasons. For that, just send an e-mail to dpo@educativa.group.

Also, the right to erase your personal data may be exercised under certain circumstances provided by the applicable law, including: the situation where personal data is no longer necessary for the purposes of processing, the situation in which the data subject opposes processing and there are no other legitimate interests that prevail for processing, the situation in which personal data has been processed illegally.

11.3 Right to rectification

If your data collected by our organization is incorrect, you can request its correction at any time by contacting the project/service of interest to you or the representative you are in contact with.

11.4 Right to erasure

You are entitled to obtain from EDUCATIVA the erasure of your data, which may be exercised under certain circumstances provided by the applicable law, including: the situation where Personal Data is no longer necessary for the purposes of processing, the situation in which the data subject opposes processing and there are no other legitimate interests that prevail for processing, the situation in which Personal Data has been processed illegally.

Erasure of your personal data can be made at any time, by requesting the already announced methods or by using our general contact data for each project/service. Usually, your data is erased immediately, but no later than one month from requesting this right. If data erasure is contrary to or maintaining the data is necessary according to data storage obligations established by law, contract or legal regulations, respectively commercial regulations or other reasons provided by law, instead of erasure, only data blocking may be performed. If this is the case for your customer account, you will receive a notification from us in this respect. After erasing your data, it is no longer possible to receive the information.

If you did not use your account for 5 years, your account will be considered inactive. In this case, any personal data that is no longer necessary to be stored for legislative reasons will be erased after the above-mentioned term. Personal data (such as basic data) that must not be erased for legal reasons will be blocked for your safety.

11.5. Right to data portability

In case you request your personal data made available, if you wish, we will provide or communicate the data to you or another responsible person in a structured, common and electronically processable format. The latter is valid only if it is technically feasible and only related to the data you have entrusted to us. The data obtained from the services rendered is not subject to such a process, and a discussion will be addressed separately.

11.6 Right to object

You have the right to oppose data processing under the conditions and cases provided by the applicable law (including data processing for direct marketing purposes) at any time and without giving any reasons. In addition, we would like to draw your attention to the fact that, by refusing all data processing processes, it is possible that the performance of the contract for the services hired and the development of the programs for customers may be limited or cannot be done, thus asking you to analyze carefully before submitting such requests.

11.7 Extensive rights in terms of data processing for personalized assessment

Apart from the above-mentioned rights, in terms of data processing for personalized assessment (where profile creation is applicable), you have the additional right to human intervention in the decision-making process, the right to challenge the decision and the right to express your point of view.

11.8 Contact (for the enforcement of the rights of data subjects)

If you contact us by e-mail at dpo@educativa.group or by mail (8 Coltei Street, District 3, Bucharest), the information provided by you (your e-mail address, your name and phone number, if appropriate) will be stored by us to answer to questions and respectively to comply with your request. We erase the data appearing in this context after the storage space is no longer necessary or we limit processing if there are storage obligations stipulated by law.

12. Right to file a complaint

You have the right to file a complaint with a competent supervisory authority (referred to in section 13 below) regarding the processing of your personal data if you believe that your data protection rights have been violated.

13. Questions about data protection

Questions about all data processing can be addressed at any time to:

Address: 8 Coltei Str., District 3, Bucharest.
Data Protection Officer: Mr. Gabi Hagi
Email: dpo@educativa.group
Phone: 0755.075.844