



Privacy Policy of the School with Class Foundation

Basic information

The controller of personal information is the School with Class Foundation (*Polish*: Fundacja Szkoła z Klasą "FSZK") with its registered office at 2 Constitution Square, 00-552 Warsaw, entered in the register of associations, other social and professional organizations, foundations and public health care facilities and in the register of entrepreneurs kept by the District Court for the Capital City of Warsaw, XII Economic Department of the National Court Register – NCR No.: 0000578705, NIP (VAT no.): 7010510338.

To contact us in matters regarding the processing of personal data, please send a message to the e-mail address: fundacja@szkolazklasa.org.pl or by traditional mail to the address of the registered office.

In the Privacy Policy we have collected the most important information regarding the principles of personal data processing in FSZK. We identify the key groups of people whose data we collect and explain for what purposes we do this, on what legal basis and how long we store it. We also provide information about the rights of persons whose data we process. We strive to ensure that all our activities related to the collection and processing of personal data comply with the law and the mission and values represented by FSZK, and that they are based on respect for the privacy and autonomy of the persons whose data we process.

Where and how we process data

We store some of the data in electronic form: primarily on our own and a rented server, on office computers, external drives and on mobile devices. We process data through IT tools used by our team and entities cooperating with the Foundation: primarily a CRM relationships management system ("CRM system"), HR and accounting programs, e-mail communication tools and cloud file storage resources. Some of the data is stored in the form of paper documentation.

Who we entrust data to

We entrust personal data for processing to entities with which we cooperate and which are responsible for:

1. IT support,
2. accounting, financial and legal services,
3. hosting support,
4. support for web applications,



5. conducting audits or evaluation of programs.

These entities operate on the basis of entrustment agreements and are equally obliged to protect personal data with us. In addition, in the case of using traditional mail communication, we entrust personal data for processing to postal intermediaries (Poczta Polska and other companies operating on the basis of the Act of 23.11.2012 – Postal Law) on the basis of entrustment agreements and service regulations. In some situations, we transfer data to other recipients (e.g. institutions or entrepreneurs cooperating with us in the organization of training or program). In such cases, we always inform the persons whose data will be processed in advance, e.g. during registration.

Rights of persons whose data we process

All persons whose data we process have the right to access their data, the right to obtain a copy of the data, as well as the right to request rectification and – in certain cases – deletion or restriction of their processing.

Persons whose data we process on the basis of our legitimate interest (e.g. addressees of press releases) may object by declaring that they do not consent to the use of their personal data in this way.

If we process data in order to perform a contract consisting in sending previously ordered materials (e.g. newsletter, mailing lists), you can opt out of such a contract at any time. Other agreements (e.g. participation in an educational program) may be terminated on the terms set out in the law or in the contract itself or in the program regulations. If we process data on the basis of consent, you can withdraw such consent at any time. In these two cases (when we process data on the basis of a contract or consent), the persons whose data we process also have the right to request the transfer of their data.

We want to make it as easy as possible to exercise your rights regarding the data we process. However, as a data controller, we must be sure that we will not share your data with unauthorized persons. Therefore, if we have doubts about the fact that the person who, for example, asks for access to data or requests their deletion, is indeed the person whose data we process, we can ask him or her for additional information.

If you believe that your rights have been violated, you can lodge a complaint with the President of the Office for Personal Data Protection. However, if you notice a problem, please let us know as well. We strive to protect your rights as much as possible. If we make a mistake, we will want to fix it as soon as possible. On matters of personal data, we encourage you to contact us at the following e-mail address: fundacja@szkolazklasa.org.pl.



Whose data we process and on what terms

Data of users of websites operated by FSZK

Through our websites, we collect data only to the extent that it is necessary to manage these websites, ensure the smooth operation of the functionalities offered within them and analyse the effectiveness of communication.

The user of the website provides his or her personal data on a voluntary basis. Some of such data may be made available due to the specificity of the provision of selected services offered on the website, e.g. publishing reports on the activities carried out. A request to discontinue processing of data may result in preventing the use of certain services/functionalities of the website in question.

Our tools for generating and analysing website viewing statistics may include Google Analytics with advertising features enabled, Facebook Pixel with advertising features enabled, Google Search Console, Google Tag Manager, Google Signals, Pixel LinkedIn, Hotjar code and SEMRush, collect using cookies: IP address (it is anonymized, but access to the full IP address saved in server logs is granted to persons with administrator rights), The type of device from which the connection is made, the resolution of the screen on which the pages were displayed, the type of operating system, the name of the domain from which the user enters our site, location data (country, city), demographic information, interests, and information about what content on our site the user visited and how much time he spent on it. The data collected is not associated with specific people browsing our websites.

The vast majority of our websites can be used anonymously – we do not require registration and login. We do not seek identification, unless it is necessary due to the nature of the activity undertaken, i.e. e.g. to sign up for the program, workshops, courses or trainings. In this case, when creating an account, FSZK collects certain data identifying the user (such as name, surname, school name, e-mail address).

The security of the data that the user provides when creating an account and to which he or she has access after logging in also depends on the quality (strength) of the password used by the user and keeping it secret. It is recommended to choose long passwords (min. 8 characters), created from randomly selected letters, numbers, at least one special character, other printable characters or parts of words. It is also recommended to use different passwords on different websites. E-mail messages sent by the Foundation's website never ask the user to send a password in this way.

To ensure the security (confidentiality and integrity) of transmitted data and to confirm the authenticity (authentication), FSZK services or parts thereof use the https protocol (also known as



SSL or TLS). In such cases, the browser used by the user should signal the fact of using such a protocol, and the user can check whether the service to which he or she has connected (website) really belongs to FSZK. This is especially important when entering personal data or passwords into forms and when connecting to services and pages whose addresses come from e-mails received by the user. In most popular browsers, a secure connection using the SSL/TLS protocol is indicated by a field preceding the address of the page in the address bar at the top of the browser window and/or a lock icon in the address bar or in the lower right corner of the browser window. Clicking on one of these places displays a window with information about whether the connection is secure and the command "More information" or "Certificate details" (or similar content), which leads to another window with information about the public key certificate that the visited website (website) holds. The most important information that the user should verify is the domain and/or name of the entity for which the certificate was issued. The domain name should match the web address with which the user intended to connect and the name of the entity – the School with Class Foundation. Be careful when providing sensitive personal data or passwords if, while connecting to the website or website, the browser displays warnings informing about the inconsistency of the website address or website with the data in the received certificate or about other problems with the certificate or secure connection – in case of such situations on FSZK websites, please contact us at fundacja@szkolazklasa.org.pl.

The rules described above only apply to websites run by FSZK. We are not responsible for the privacy policies of other websites linked from our sites. Google Analytics, Google Search Console, Google Tag Manager, Facebook Pixel, Pixel LinkedIn, Hotjar code and SEMRush are installed on FSZK websites, which track user traffic on all subpages using cookies. The information obtained using these tools is not shared with other entities and is used solely for statistical purposes and to improve the usability of the pages. Thanks to the statistics obtained, we can improve our offer and make it more interesting for you as a user.

With regard to the exceptional cases in which personal data is transferred to the USA, Google complies with the EU-US Privacy Shield, privacysshield.gov/EUUSFramework.

The legal basis for the use of Google Analytics, Google Tag Manager and Google Search Console, Facebook Pixel and Hotjar is Art. 6 para. 1 sentence 1 lit. f GDPR.

Third-party provider information for Google Analytics, Google Tag Manager i Google Search Console: Google Dublin, Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland, fax: +353 (1) 436 1001.

Terms of Use: www.google.com/analytics/terms/de.html

Information on the protection of personal data:
www.google.com/intl/de/analytics/learn/privacy.html



Privacy Policy: www.google.de/intl/de/policies/privacy

Third-party provider information for Hotjar Ltd: Level 2, St Julians Business Centre, 3, Elia Zammit Street, St Julians STJ 3155, Malta, Europe.

Terms of use, information on personal data as well as data protection declaration: <https://www.hotjar.com/legal/policies/privacy-v4/>

Third-party delivery information Facebook Inc., 1601 S. California Ave., Palo Alto, CA 94304, USA or, for users resident in the EU, Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland.

Terms of use, information on personal data as well as data protection declaration: https://www.facebook.com/policies_center/

Data of subscribers to newsletters and mailing lists

We process the e-mail addresses of subscribers to newsletters and thematic mailing lists on the basis of consent in order to receive information from FSZK regarding FSZK's educational activities and products and for statistical purposes. Messages you send may contain links to automatically generated URLs that we use to determine if and when you opened the message, and what information you are interested in enough to click on the accompanying links. You can withdraw your consent to the newsletter at any time: by clicking on the unsubscribe link or by sending an e-mail containing the relevant request to fundacja@szkolazklasa.org.pl.

Your data may be entrusted for processing to entities that provide FSZK with services related to the processing of personal data, with the proviso that these entities do not acquire the right to process this data themselves, but only to carry out FSZK's instructions in this respect. The data will be stored for the purpose of sending messages regarding educational activities and products until consent is withdrawn, and for statistical purposes for no longer than 5 years from the end of the year in which the last message regarding FSZK's educational activities and products was sent to you.

Data of participants of educational programs

When organizing an educational program, the scope of information that we will process is provided in its regulations. We usually limit ourselves to collecting the name, email and telephone number of the participants, and the same and address of the school where the participant works (in the case of teachers) or studies (in the case of students). We process the data in order to conclude and perform the contract. Joining the program and agreeing to the provisions of the program regulations, which include FSZK's obligations as an organizer and participant's



obligations – is the conclusion of a contract for participation in the program. Providing data is voluntary, but necessary to participate in it.

Sometimes we ask you to complete the data. This is most often done in situations where on-site training or conferences are organized. In those cases we typically check what kind of meals to prepare on the spot (e.g. vegetarian, meat).

We make the data available to public administration bodies in the event of inspections and sponsors in connection with the implementation of the contract for the organization of the program by FSZK and verification of compliance of settlements with documents / information used as reporting evidence.

Upon completion of a program, we process data on the basis of our legitimate interest for purposes related to the need to control how funds are spent. Our sponsors usually reserve in their contracts the possibility of controlling the correctness of the implementation of the program and spending funds also after its completion. Therefore, programme sponsors may also process personal data on the basis of their legitimate interest.

After a program ends, we must store personal data for documentary purposes. Personal data related to the contract are therefore stored until the later of: expiry of the limitation period for claims arising from the contract or until the expiry of the retention period for project documentation required by the sponsors; or the expiry of the period resulting from the applicable accounting regulations.

Data of parents and legal guardians of underage pupils and pupils participating in FSZK programmes and events

When processing personal data of underage students participating in our educational programs, workshops, courses or trainings, we collect written confirmations of familiarisation with the information about data processing or consent to data processing. In addition to pupils, such consents are also signed by their parents or legal guardians.

Therefore, we process the names and surnames of parents/legal guardians in order to conclude and implement the contract of participation in the program, course or workshop. We make the data of parents/legal guardians available to public administration bodies in the event of inspections and to sponsors in connection with the implementation of the contract for the organization of the program by FSZK and with verification of compliance of settlements with documents/information confirming reporting.

Personal data related to the contract are stored until the later of: the expiry of the limitation period for claims arising from the contract or until the expiry of the retention period for project



documentation required by the sponsors; or the expiry of the period resulting from the applicable accounting regulations.

Data of persons completing surveys

We want to know what is important for the people for whom we perform our activities, what their opinions, problems and needs are. Therefore, using Google Forms or similar systems, we publish surveys, e.g. asking about how a problem we are dealing with is perceived. Personal data related to the contract (when the survey is completed by persons participating in the programs) is stored until the later of: the expiry of the limitation period for claims arising from the contract or expiry of the retention period for project documentation required by the sponsors. In the case of extra-program surveys, we process data on the basis of your consent, for 5 years from the end of the calendar year in which they were provided. If you would like us to remove them earlier, please send your objection to: fundacja@szkolazklasa.org.pl.

Data of persons communicating with FSZK via social networks

Meta Platforms Inc. ("Facebook") is the controller of its users' personal data and processes them on the basis of its own terms and conditions. When you interact with us via Facebook (like/follow a page, reactions to posts, shares, comments, private messages), in addition to Facebook, FSZK becomes the administrator of your personal data. We process data, such as name and surname / nickname, image, public profile and other information provided in messages or comments, on the basis of our legitimate interest, in order to respond to comments and messages, to maintain relationships with people interacting with us, as well as to analyse the effectiveness of communication. As a rule, we do not combine your interactions with us on Facebook with information that you provide to us in other ways (e.g. by e-mail), unless otherwise stated in the given circumstances (e.g. you wrote us a private message on Facebook in which you provided an e-mail address asking you to contact us). We do not share your personal data with anyone. Keep in mind, however, that all information about you can be accessed by Facebook as the administrator of the portal. If you want your data to be processed in accordance with our Privacy Policy (cf. details of persons contacting us by e-mail, phone or letter), we encourage you to contact us via channels other than social networks. If you write us an e-mail, for example, we have control over what happens to this information and who reads it. You can also encrypt it.

Data of media people

We process data of media people (journalists, etc.) obtained directly from them, from the editorial office or from the Internet. The scope of processed data may include: name and surname, gender, e-mail address, telephone number, affiliation (including previous affiliations), editorial address. We process this data on the basis of our legitimate interest in order to inform about the activities undertaken by FSZK, educational programs and relationships management. We process the data



until the end of FSZK's activity. If you do not want to receive press releases from us, you can object to the processing of your data. In this case and if you have additional questions, please send a message to: fundacja@szkolazklasa.org.pl. If you want to receive FSZK press releases and invitations to events to which we invite the media, write to us at: fundacja@szkolazklasa.org.pl. Providing data is voluntary, but necessary to receive messages.

Cookies

FSZK uses cookies on the Website in order to provide services at the highest level. In accordance with the Telecommunications Law, the User may consent to the installation of cookies by the website by setting the web browser accordingly. The User's decision to use the Website without changing the browser settings is treated as his choice.

The website does not collect any information automatically. The exception is the information contained in cookies.

Cookies are information technology data (text files). They usually contain the name of the website from which they originate, the storage time on the end device and a unique number.

First of all, cookies allow to recognize the device used by the user and adapt the website to his or her preferences. They are also used to create statistics. Thanks to them, it is possible to improve the structure and content of the website. In addition, cookies make it easier for the user to maintain the session after logging in. Thanks to this, the User is not forced to log in to every subpage.

The Website uses "session" and "permanent" files. The former are temporary. They are stored on the user's end device until logging out, leaving the website or turning off the web browser. The latter type is stored in the end device for the time specified in the parameters of cookies or until they are deleted by the User.

The types of cookies used enable:

1. the use of the services available on the Website,
2. ensuring security by, for example, detecting fraud,
3. collecting information about how to use the Website,
4. "remembering" the settings selected by the User and personalize the user interface, e.g. selected language, region from which the User comes, etc.,
5. providing the User with advertising content tailored to his or her interests.



Reporting threats and privacy or security breaches

In matters related to the privacy policy or threats to privacy related to the FSZK Website and in any case of suspected violation of privacy or other security breaches, as well as to submit other comments about the service, please send a message to fundacja@szkolazklasa.org.pl.