

# Privacy Policy of the “School with Class” Foundation (*Polish: Fundacja Szkoła z Klasą*)

## Background

The controller of personal data, the principles of processing of which are described herein, is the School with Class Foundation (FSZK – *Fundacja Szkoła z Klasą*), with its registered office at address Śniadeckich 19, 00-654 in Warsaw. To contact on matters of personal data, please send a message to: [fundacja@szkolazklasa.org.pl](mailto:fundacja@szkolazklasa.org.pl) or by traditional mail to the address of the registered office.

The Privacy Policy is a collection of the most important information regarding the principles of personal data processing in our organization. We indicate here the key groups of persons whose data we collect and explain the purposes for doing so, the legal basis and how long we keep it. We also inform you what rights are granted to persons whose data we process. We strive to ensure that all our activities related to personal data are in accordance with the law and the mission and values represented by the School with Class Foundation, 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 on a rented server, on office computers, external drives and on mobile devices. We process data using IT tools operated by the team and entities partnering with FSZK: first of all, the CRM customer relations management system (hereinafter: CRM system), HR and accounting software, tools for communicating via e-mail and the cloud for storing files. We store some of the data in the form of paper documentation.

## To whom we entrust data

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

- IT support;
- accounting and financial services;
- hosting support;
- support for web applications;
- conducting audits or evaluation of programs.

These entities operate on the basis of entrustment agreements and are obliged to protect personal data on the same terms as we are. 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 postal law) on the basis of entrustment agreements and service regulations. In some situations, we transfer data to other recipients (e.g. institutions or companies cooperating with us in the organization of training or programs). In such cases, we always inform you in advance, e.g. at the time of sign-up.

## 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, its deletion or restriction of its 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 want us to use their 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 it 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 agreement itself or in the program regulations. If we process data on the basis of consent, you can withdraw it 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 that their data be transferred.

We want to make it as easy as possible for you to exercise your rights regarding the data we process. However, as a data controller, we must be sure that we do not share your data with unauthorized persons. Therefore, if we have doubts that a person who, for example, asks for access to data or requests their deletion, is actually 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 file a complaint with the President of the Personal Data Protection Office. However, if you notice a problem, please let us know as well. We strive to protect your rights in the best possible way. If we make a mistake, we will want to fix it as soon as possible. Regarding personal data, we encourage you to contact us at the following email address: [fundacja@szkolazklasa.org.pl](mailto:fundacja@szkolazklasa.org.pl).

## Whose data we process and on what terms

### Data of users of websites run 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 analyze the effectiveness of communication.

The user of the website provides their personal data on a voluntary basis. Some of this data may be made available due to the nature of providing selected services offered on the website, e.g. publishing reports on the activities carried out. A request to cease data processing may entail preventing the use of certain services/functionalities of a given website.

Our tools for generating and analyzing website visit statistics (Google Analytics with advertising functions enabled, Facebook Pixel with advertising functions enabled, Google Search Console, Google Tag Manager, Pixel LinkedIn, Hotjar code and SEMRush) use cookies to collect the following data: IP address (it is anonymized, but access to the full IP address recorded in the server logs is granted to persons with administrator privilege), the type of device from which the connection is made, the screen resolution on which the pages were displayed, the type of operating system, the name of the domain from which the user enters our website, location data (country, city), demographic data, interests, and information about what content on our website a given user visited

and how much time they spent on it. The data collected is not associated with specific people browsing our websites.

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

The security of the data that the user provides when creating an account and to which he 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), consisting of 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. Email messages sent by FSZK never ask the user to send a password via email.

To ensure the security (confidentiality and integrity) of the data transmitted and to confirm authenticity (authentication), FSZK services or their fragments 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 website with which they have connected (the web page) really belongs to FSZK. This is particularly important when entering personal data or passwords into forms and when connecting to websites and pages whose addresses have been obtained from email messages received by the user. In most popular browsers, a secure SSL/TLS connection is indicated by a field preceding the web page address in the address bar at the top of the browser window and/or by a padlock 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 website (website) is holding. The most important information that the user should verify is the domain and/or name of the subject for which the certificate was issued. The domain name should correspond to the web address with which the user wanted to connect and the name of the entity – the School with Class Foundation. Care should be taken when providing sensitive personal data or passwords if, when connecting to a website or web page, the browser displays warnings informing about the incompatibility of the website address or website with the data in the received certificate or about other problems with the certificate or secure connection – in the event of such situations in FSZK services, please contact us at [fundacja@szkolazklasa.org.pl](mailto:fundacja@szkolazklasa.org.pl).

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

With regard to the exceptional cases in which personal data is transferred to the USA, Google complies with the EU-US Privacy Shield agreement, [privacyshield.gov/EU-USFramework](https://privacyshield.gov/EU-USFramework). The legal

basis for the use of Google Analytics, Google Tag Manager and Google Search Console, the Facebook Pixel and Hotjar is Art. 6.1 sentence 1 letter f) of the GDPR. Information of the third-party provider: Google Analytics, Google Tag Manager and 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](http://www.google.com/analytics/terms/de.html), information on the protection of personal data: [www.google.com/intl/de/analytics/learn/privacy.html](http://www.google.com/intl/de/analytics/learn/privacy.html), as well as the data protection declaration: [www.google.de/intl/de/policies/privacy](http://www.google.de/intl/de/policies/privacy). Information of the third-party provider 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 the data protection declaration: [hotjar.com/legal/policies/privacy-v4/](http://hotjar.com/legal/policies/privacy-v4/). Third-party provider information Facebook Inc., 1601 S. California Ave., Palo Alto, CA 94304, USA or, for EU resident users, Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland. Terms of use, information on personal data, as well as the data protection declaration: [facebook.com/policies/](https://facebook.com/policies/).

## Data of subscribers of newsletters and mailing lists

We process the email addresses of subscribers of newsletters and thematic mailing lists on the basis of express consent to receive information from FSZK regarding FSZK's educational activities and products, and for statistical purposes. Your messages may contain links to automatically generated URLs that we use to determine if and when you opened the message and what information you were 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 email containing a request to [the.fundacja@szkolazklasa.org.pl](mailto:the.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 such entities do not acquire the right to independently process this data, 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 the consent is withdrawn, and for statistical purposes no longer than 5 years from the end of the year in which the last message regarding the educational activities and products of FSZK was sent to you.

## Data of participants in educational programs

When organizing an educational program, we specify the scope of information that we will process in the program's rules. Typically, we only collect the email address and phone number of participants and their name and surname, the name and address of the school where the person works or studies. In case of a teacher, the subject s/he teaches, and in case of pupil, their form. We process the data in order to conclude and perform the agreement. Joining the program and agreeing to the provisions of the program rules, which stipulate the obligations of FSZK as the organizer and the obligations of the participant – constitutes conclusion of an agreement for participation in the program. Providing data is voluntary, but necessary to take part in it.

Sometimes we ask you to fill in the data. This is most often done in situations of organizing on-site training courses or conferences. In those cases, we usually check what kind of meals to prepare on the premises (e.g. vegetarian, meat).

We make the data available to public administration bodies in the event of audits and to sponsors in connection with the performance of the contract for the organization of the program by FSZK and verification of compliance of settlements with documents/information confirming reporting.

After the end of the program, we process data on the basis of our legitimate interest for purposes related to the need to control the way funds are spent. Our sponsors usually reserve in their contracts the possibility of auditing the correctness of delivery of the program and the spending of funds also after its completion. Therefore, program sponsors may also process personal data on the basis of their legitimate interest.

After the end of the program, we must store personal data for documentation purposes. Personal data related to the contract is therefore stored for the longest of the following periods: until the expiry of the limitation period for claims arising from the agreement or until the expiry of the period of storage of project documentation required by the sponsors, or until the expiry of the period resulting from the applicable regulations on bookkeeping.

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

When processing personal data of underage students participating in our educational programs, workshops, courses or training, we collect written confirmations of familiarization with information about data processing or consent to data processing. Such consents are signed by their parents or legal guardians in addition to pupils themselves.

Therefore, we process the names and surnames of parents/legal guardians in order to conclude and implement a contract for participation in a program, course or workshop. We make the data of parents/legal guardians available to public administration bodies in the event of audits and to 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 confirming reporting.

Personal data related to the contract is stored for the longest of the following periods: until the expiry of the limitation period for claims arising from the agreement or until the expiry of the period of storage of project documentation required by the sponsors, or until the expiry of the period resulting from the applicable regulations on bookkeeping

### Data of persons completing surveys

We want to know what is important for the people for whom we act, what are their opinions, problems and needs. Therefore, we use Google Forms or similar systems to publish surveys, e.g. asking about views on a problem we are dealing with. Personal data related to the contract (when the survey is completed by persons participating in the programs) is stored for the longest of the following periods: until the expiry of the limitation period for claims arising from the contract or until the expiry of the period of storage of project documentation required by the sponsors, or until the expiry of the period resulting from the applicable regulations on bookkeeping. In the case of extracurricular surveys, we process data on the basis of your consent, for 5 years from the end of the calendar year in which it was provided. If you want us to remove it earlier, please send your objection to: [fundacja@szkolazklasa.org.pl](mailto:fundacja@szkolazklasa.org.pl).

## Data of persons communicating with FSZK via social networks

Facebook is the controller of its users' personal data and processes them on the basis of its own terms of service. When you interact with us via Facebook (liking/following a page, reactions to posts, shares, comments, private messages), FSZK also becomes the controller of your personal data, in addition to Facebook. We process data such as name, 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 analyze the effectiveness of communication. As a general rule, we do not link your interactions with us on Facebook with information that you provide to us otherwise (e.g. by e-mail), unless something else arises from the circumstances (e.g. you write us a private message on Facebook in which you provide an e-mail address asking us to contact you). We do not pass on your personal data to anyone. However, keep in mind that Facebook, as the administrator of the portal, has access to all information about you. If you want your data to be processed in accordance with our Privacy Policy (cf. Data of persons contacting us by e-mail, telephone or letter), we encourage you to contact us through channels other than social networks. If you write us, for example, an e-mail, we have control over what happens to this information and who reads it. You can also encrypt it.

## Media people's data

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, email address, telephone number, affiliation (including previous ones), 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 relationship management. We process the data until the end of FSZK's activity. If you do not wish to receive press releases from us, you can object to the processing of your data. In this case or if you have additional questions, please send a message to: [fundacja@szkolazklasa.org.pl](mailto:fundacja@szkolazklasa.org.pl) If you want to receive FSZK press releases and invitations to events to which we invite the media, please write to us at: [fundacja@szkolazklasa.org.pl](mailto:fundacja@szkolazklasa.org.pl). Providing data is voluntary, but necessary to receive messages.

## Cookies

On our websites, we use text files, commonly referred to as cookies, to create anonymous visitor statistics, using Google Analytics with advertising functions enabled, Google Search Console, Google Tag Manager, Facebook Pixel, Pixel LinkedIn, Hotjar code and SEMRush and for the technical operation of the websites and the use of the functionalities offered, e.g. identification and authentication of users signed in. You can manage cookies through your browser settings.

## Reporting privacy or security threats and breaches

In matters related to the privacy policy or threats to privacy related to the FSZK website and in any case of suspicion of a breach of privacy or the occurrence of other security breaches, as well as in order to submit other comments about the website, please send a message to [fundacja@szkolazklasa.org.pl](mailto:fundacja@szkolazklasa.org.pl).