

# Step-Wise Privacy Policy

This document outlines the way the Step-Wise app (later referred to as “we”, “our” or “us”) deals with the data of its users (referred to as “you” or “your”) and related privacy matters.

## 1. Version

This is the first version of the Privacy Policy (1.0). It has not changed since the first delivery of the app.

## 2. Main philosophy

Our privacy policy is based on two principles:

- **Need to know:** you only get access to the specific data you need to accomplish your goals.
- **Ask when required:** only when you perform an action that will give others access to your data (like logging in or enrolling in a course) do we ask you for approval. Not before, and not after.

## 3. Information we collect

When you do not log in to the website, no identifiable data is collected. We do not track you in any way. This limits any potential interaction with the website, but we find the silent tracking of users to be unnecessary and inappropriate.

### Logging in: third-party identity provider data

When you do log in, a variety of data will be stored. Logging in to the website is only done through third party identity providers. We do not store any passwords. We do store the following information, if obtained from the third party identity provider.

- An ID code: to uniquely identify you.
- Name-related information (first name, last name, etcetera): to properly address you.
- E-mail address: used to send potential notifications, updates to this privacy policy, etcetera.
- Organization (which university/school): used to recommend relevant courses.
- Organization role (student, teacher, etcetera): used to determine who can create new courses.
- Organization ID (student/employee number): used in case a course teacher needs an (Excel) export of which students passed or failed the course.
- Preferred language: to offer content in the right language, when appropriate.

### Exercise practice data

Step-Wise is an online platform that keeps track of which skills students have mastered and which skills they are struggling with. To accomplish this, the following information is tracked.

- Exercise data: all exercises that you do and all submissions you make will be remembered.
- Skill data: estimates will be made about your skill level. These estimates are also stored.

## **Other information**

The regular operation of the website requires various other trivial information to be recorded. Examples include:

- Site settings and preferences.
- Course enrollments and related data.
- Approvals when you indicate other users (like teachers) may access your data.
- Other trivial information related to the regular usage of the Step-Wise app.

## **4. Usage of your information**

We use your information for the regular functioning of the Step-Wise app. That is: your data influences what you see in the app. It also influences potential email notifications you may receive, all subject to your notification preferences.

### **Showing data to other Step-Wise users**

Your personal data is never shown to other Step-Wise users without your express consent. In various cases, we do ask you for this consent. For example, if you enroll in a course, you are asked if the course teachers may access your progress with the course. If you do not provide consent, you may not be able to access the relevant app functionalities.

### **Exposing data to third parties**

We will never provide your data to third parties without your express consent.

## **5. Storage of your data and possible breaches**

All your data is securely stored on our servers, managed by DigitalOcean, and located in Amsterdam.

In case a breach of the data occurs that negatively affects users, affected users will be notified within 72 hours of the breach being noticed. If the breach has a significant adverse effect on individuals' rights and freedoms, then the breach will also be reported to the relevant supervisory authorities within 72 hours of being noticed. All data breaches, including those that do not need to be reported, will be recorded.

## **6. Children under 13**

The Step-Wise app is not intended for children under 13 years of age. We do not knowingly collect personal information from children under 13. If you are under 13, please do not provide any information to the Step-Wise app.

## **7. Usage of cookies**

Step-Wise makes minimal use of Cookies. We only use Cookies for matters you have provided express approval for. For instance, when you first log in on a new device, we ask if we can place Cookies to properly process said log-in, as well as register the Cookie approval. Other Cookies will not be placed.

## **8. Removal of data**

If you do not wish to use Step-Wise anymore, you are able to remove all data. To do so, delete your account through the Step-Wise app. This will erase all personal data that we have stored of you from our servers. Note that this action is irreversible: the data cannot be retrieved afterwards. As long as you do not delete your account, your data may be stored indefinitely.

The removal of specific information (for instance information related to specific skills or exercises, like exercises you failed in the past) is not possible. As long as you use the Step-Wise app, all actions related to exercises, courses, etcetera may be recorded. Requests to remove specific information will generally be refused or ignored.

## **9. Loss of data**

Step-Wise performs regular back-ups of all relevant data. In case of a data loss, attempts will be made to restore this data from back-ups. If data is nevertheless permanently lost or otherwise not realistically retrievable, then Step-Wise or any associated organizations are not liable for any resulting damages.

## **10. Communication**

We will use your email address to send you crucial Step-Wise-related information, like updates to the privacy policy, changes of ownership of Step-Wise, and other matters directly affecting the functioning of the Step-Wise app. It is not possible to opt out of these crucial emails, except for the complete removal of your Step-Wise account.

We may use your email address to send you non-crucial notifications related to the website. Think of reminders to practice, notifications of approaching course deadlines, newsletters and similar. It is always possible to opt out of non-crucial emails through the notification settings.

We will never use your email address for non-crucial messages that you cannot opt out of. Nor will we share your email address with third parties without your express consent.

If you email us with a problem/question, from the email address that is connected to your account, our support officers may check your data to help you resolve your problem/question. This data may be used in a reply to you, but is otherwise not recorded.

## **11. Business transfers**

In case Step-Wise buys, merges or partners with or is sold to other companies or businesses, all Step-Wise functioning and data may be passed along with the transaction. When this happens, you will be notified

of this through the email address that is known to us, at least two weeks prior to said transaction. If you do not approve of this transaction, you will be able to delete your account and remove all your data.

## **12. Future changes to this privacy policy**

We may update this Privacy Policy as necessary to reflect changes we make and to satisfy legal requirements. In case of significant changes relating to you, we will provide you with appropriate notice.

- For changes relating only to future interaction with the Step-Wise app, we will ask you, when you log in again, whether you approve of the new Privacy Policy.
- If the changes also encompass passive users, you will be notified through the email address you provided, at least two weeks prior to the effective date of the revised Privacy Policy.

If you do not agree with the revised Privacy Policy, you will be able to delete your account, removing all your data from the Step-Wise servers.

## **13. Dispute resolution**

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, you should contact us directly at [info@Step-Wise.com](mailto:info@Step-Wise.com). We will investigate and attempt to resolve complaints and disputes regarding the use and disclosure of personal information in accordance with this privacy policy.