Last updated: June 3, 2019

Effective date: February 11, 2019

Privacy Policy

Luxembourg Tech School (LTS) asbl ("us", "we" or "our") operates the FinGoL Computer Program in the form of an Educational Game Chatbot (hereinafter referred to as the "Service").

We aim to be completely transparent with how we collect and use personal information we gather about our users. Our users' privacy is important to us and we will protect and respect the personal information of all users who use or access our Service. This page informs you of our policies regarding the collection, use, and disclosure of personal data when you use our Service and the choices you have associated with that data. We use your data to improve the Service and for purely educational purposes. By using or accessing the Service in any manner, you agree to the collection and the use of your information in accordance with this policy.

How does LTS asbl control and process the data?

We are the Data Controller, as we determine the means and/or purposes of the personal information processing. Simultaneously, we are a Data Processor, as we carry out personal information processing tasks, in order to accomplish our purposes.

The Data Controller is responsible of controlling that the data of users is processed in a proper manner and shall take appropriate security measures to

prevent unauthorized access, disclosure, modification, or unauthorized destruction of the data.

In addition to the Data Controller, in some cases, the data may be accessible to certain types of persons in charge, involved with the operation of the service (developers, analysts, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, institutions, online platforms) appointed, if necessary, as Data Processors by the owner. The updated list of these parties may be requested from the Data Controller at any time. The data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated.

Currently, the Data Processors are LTS asbl itself and the online platform for developing chatbots Chatfuel (200 Labs, Inc.). Additionally, the online social media and social networking service company, Facebook Inc., is a sub-processor.

General Data Protection Regulation (GDPR)

What information does FinGoL collect?

Information You Provide to Us:

We receive and collect any information you consciously provide to us. For example, if you contact us (via our Facebook page, phone, email, letter or form), e.g. for a support request or for responding to a survey: Name, e-mail address, IP address, information on our communication with you and any additional information you provide us with.

Information Collected Automatically

Chatfuel is a bot platform for creating chatbots for Facebook Messenger. The linkage between Chatfuel and Facebook Messenger enables the storage of system attributes. System attributes are available in every bot and contain all the information the bot receives about Facebook Messenger users. These attributes are provided to us by our Data Processor (Chatfuel), they cannot be modified, and contain the following user's personal information, if available:

Fields	Description
Messenger ID	User's unique persistent ID. Also known as Facebook's page-scoped user ID
First name	User's first name
Last name	User's last name
Gender	User's gender
Timezone	User's timezone
Locale	User's Messenger language setting
Ref	Value of ref parameter from m.me link user clicked last time
Profile picture	User's profile picture URL

The collection of this personal information has no specific purpose; they are stored in our records by default since it is about a platform connected to Facebook Messenger. Our Data Processor, Chatfuel, claims that they do not use this personal data for any purpose other than to provide us, the Data Controller,

with this information. Moreover, we, the Data Controller, also allege that we do not use this information for any purpose at all.

We automatically receive and collect information about you whenever you use or access our Service. For example, while using our Service, you will have to input some personal information, such as your language, work experience level and interests. For some entries, ranges of values or hard-coded options are offered, in order to add a degree of anonymity. In the Appendix A, you can find the user's information fields asked in the FinGoL game. Moreover, through our Service you will be asked about other kind of information such as your approximate monthly income and expenses sources. Please note we do not control whether the information resembles reality or not. The main and only purpose of our Service is to teach, guide and advise on how to manage personal finances, therefore, that the data does not completely match the reality does not interfere with the purpose of the game. We do recommend not to use your real personal financial data or any other private data.

Will FinGoL share any of the personal information it receives?

Once assured that we have the appropriate security and contractual guarantees to protect your information, we will share this one with:

- Third parties for legal reasons: we must share your personal information with law enforcement, regulators and other legal parties, in order to comply with the law, enforce our legal claims and/or protect the integrity and security of our Service and our users' information.

Is your personal information secure?

We strive to protect the privacy of your personal information that we have in our records, but unfortunately, we cannot guarantee complete security. Unexpected events such as, unauthorized entry or use, cyber-attacks, hardware or software failure, and other factors, may compromise the security of user information at any time.

Since you will access our Service via Facebook Messenger you must prevent unauthorized access to your account and personal information by selecting and protecting your password and/or other sign-on mechanism appropriately and limiting access to your computer or device and browser by signing off after you have finished accessing your account.

How long will we keep your information?

We will store personal information for as long as the user uses our Service. For inactive users during a period of 3 months, their information will be deleted.

What rights and choices do you have?

You have the right, at any time, to know whether your personal data has been stored and can consult the Data Controller to learn about your contents and origin, to verify your accuracy or to ask for them to be supplemented, cancelled, updated or corrected, or for their transformation into anonymous format or to block any data held in violation of the law, as well as to oppose their treatment for any and all legitimate reasons. Requests should be sent to the Data Controller at the contact information set out below.

You can also always opt not to disclose information to us by not using or accessing the Service or any contact form towards us. You may stop using the Service at any time. If you remain inactive for a period of 3 months, your information will be immediately and entirely erased from our records.

You also have the right to expressly request the deletion of all your information at any time and we will immediately and entirely erase your information from our records. The process to request the deletion of your information may be done by sending us an email to info@techschool.lu expressing that you want us to delete your information from our records.

Please note that the use or access of our Service binds a contract between you and FinGoL. Your use of the Service is also governed by and subject to the Chatfuel Terms (https://chatfuel.com/TermsOfUse.pdf), Facebook Platform Policies (https://developers.facebook.com/policy) and Facebook Commerce Product Merchant Agreement (https://www.facebook.com/legal/commerce_product_merchant_agreement), which are incorporated here as reference and form part of the terms of this policy. You are solely responsible for complying with the Chatfuel Terms, Facebook Platform Policies and the Facebook Trade Products Trade Agreement. Please note that you must agree to and accept all the terms of this policy, or you do not have the right to use the Service.

Will this Privacy Policy ever change?

The Data Controller reserves the right to make changes to this privacy policy at any time by giving notice to its users on this page. It is strongly recommended to check this page often, referring to the date of the last modification listed at the

bottom. If a user objects to any of the changes to the policy, the user must cease using this application and can request that the Data Controller remove the personal data. Unless stated otherwise, the then-current privacy policy applies to all personal data the Data Controller has about users.

You must agree to and accept all the terms of this policy, or you do not have the right to use the Service. If you use or access the Service in any way, it means that you agree to this policy and this one will remain in effect while you use the Service.
Additionally, we will not be responsible for you using the Service in a way that violates the law.

What if you have questions about this Policy?

If you have any question regarding our privacy policy, please do not hesitate to send us a detailed email to info@techschool.lu.

APPENDIX A

Users' information fields

Fields from Profile section	Type	Description
Gender	Categorical	Gender the user wants to use for playing in the game
Property	Yes/No	If user has a property or not
Subject	Categorical	Subjects the user is the most interested in
Work experience	Categorical	User's number of work experience years

Fields from CV section	Type	Description
Studies	Categorical	Last title the user has gotten
Languages	User input	Native and secondary user's languages
Skills	Categorical	User's main skills or competencies

Fields from Budget Management	Type	Description
Savings	User input	User's savings
Scholarship	User input	User's scholarship income

Rent	User input	User's monthly renting income
Mobile phone	User input	User's monthly mobile phone expenses
Food	User input	User's monthly food expenses
Entertainment	User input	User's monthly entertainment expenses
Education	User input	User's monthly expenses for education
Pension plan	User input	User's monthly expenses for pension plan
Emergency fund	User input	User's monthly gap of money for emergency fund

Fields from Car insurance	Type	Description
Diving license	Categorical	Years with a valid driving license
Car accidents	Categorical	Number of car accidents

Fields from Health insurance	Type	Description
Smoker	Yes/No	If smoker or not
Disease	Yes/No	If has chronic disease or not

Glasses	Yes/No	If wearing glasses or not
Dental prosthesis	Yes/No	If needs dental prosthesis or not
Illness	Yes/No	If is being affected by a severe illness or not
Luxembourgish	Yes/No	If is Luxembourgish or not
Hospitalization	Yes/No	If insurance should cover his/her hospitalization costs or not