Luxembourg Tech School (LTS) asbl ("us", "we" or "our") operates educational classroom classes in modules, workshops, online courses, events, projects, and challenges (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 document 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.

Data Controller

Data Controller: Luxembourg Tech School Asbl

Address: Luxembourg City-Incubator, 9, rue du Laboratoire, L1911, Luxembourg.

Data Protection Officer

LTS has contracted the services of external DPO to MGSI S.a.r.l, company specialized in Privacy and Data Protection.

Contact detail of DPO:

MGSI S.a.r.l. R.CS. Luxembourg: B192771

Email: dpo@lts.lu

Information collected

If you contact us for a support request or for courses and events registration, we collect the following categories of data:

- Personal identification data: first name, last name, parent´s or representative name, e-mail address, age, gender, school name.
- Other kind of data such emergency contact details and food allergies in case of needed.

If you contact us as part of a commercial relationship, we collect the following categories of data:

- Personal identification data (e.g., name, address, phone number).

- Economic and financial data: occupation, bank account details, tax situation.

In addition, LTS does not collect any information automatically, the main communication tool is Microsoft Teams which is provided under the Microsoft Office 365 license managed by the Luxembourg Centre de Gestion informatique de l'éducation https://portal.education.lu/cgie/, GDPR compliance https://portal.education.lu/cgie/SERVICES/GDPR/GDPR-FAQ. For mandatory and optional software tools and online services (listed in Appendix 1), which required user registration, possible actions for students under 16 years old are indicated.

Purposes and Legal Basis

LTS collects and processes Client´s personal data in order to provide the services and maintain the relationship. Legal basis is performance of the contract. GDPR (art. 6.1.b)

LTS collects and processes users´s personal data such in the framework of the participation in its program, delivery of the content and analyses of its activities. By using or accessing the Service in any manner, you agree to the collection and the use of your information regarding your child. Legal basis is consent. GDPR (art. 6.1.a)

LTS also collects and processes your personal data in the framework of your registration to the Events and workshops organized by LTS. Legal basis is consent (art. 6.1.a)

We also process the identification and contact data that the user provides through the contact form on the website, or when contacting the Responsible by email, as well as other data that the user includes. The data processing is based on the acceptance and consent of the interested party: in those cases where to make a request it is necessary to fill in a form and make a "click" on the send button, the realization of the same will necessarily imply that the user has been informed and has expressly granted his consent to the processing of his data based on this privacy notice.

When you visit our website, we store certain information about the browser and operating system you use, the access status (e.g., whether you were able to access a website or received an error message), the search terms you may have entered. We also store your IP address for
security reasons. We use the personal data collected when you visit our website to operate it in the most convenient manner for your use and to protect our IT systems from attacks and other illegal activities. Legal basis is legitimate interest (GDPR, art. 6.1.f)

In order to use certain functions and features of the Sites, LTS uses cookies. For more information visit our Cookies Policy. https://www.techschool.lu/privacy-policy.pdf

Retention Period

We will store personal information for as long as the user uses our Service. For inactive users during a period of 6 months, their information will be deleted, excluding education records and certificates.

Once the course has finished, the User Accounts must be deleted by the User.

Personal data transfer to third parties

We can also provide some information to external service providers whose participation is necessary for the provision of services to clients, such as lawyers, third-party technical service providers etc.

These recipients of Personal Data may act as Data Controllers or processors and must comply with the legal and/or contractual obligations regarding the protection of Personal Data, including applicable processor contractual clauses (in case of processors), confidentiality obligations.

Recipients

We can provide your personal data to other recipients if required to meet our contractual and legal obligations. These can include:

- Official authorities such the Ministry of Education to create the account numbers for the programs.
- School in Charge.

Your Rights

You have the right to request:
- ✓ **Right of access:** you have the right to obtain confirmation that we are processing your personal data and where this is the case to obtain a copy of these data.

- ✓ **Right to rectification:** you have the right to request the rectification of your inaccurate personal data or to have incomplete personal data completed.

✓ **Right to erasure:** in specific cases, you have the right to request the erasure of your personal data. We may, however, retain certain information about you as required by law or when we have a legal basis to do so.

✓ **Right to restriction of processing**: you have the right to obtain the restriction of specific personal data processing when one of the following applies:

- When you have contested the accuracy of your personal data, for a period enabling us to verify the accuracy of the personal data,
- If your personal data have been processed by us in an unlawful way and you oppose their erasure.
- We no longer need your personal data, but they are required by you for the establishment, exercise, or defence of legal claims.
- When you have exercised your right to object, for a period enabling us to verify whether our legitimate interests override yours.

✓ **Right to data portability:** you have the right to receive personal data that you have provided to us in a structured, commonly used and machine-readable format and to transmit these data to another controller. However, when the personal data are not processed by automated means, you do not fulfil the conditions to exercise your right to portability.

✓ **Right to object**: you have the right to object at any time, on grounds related to your particular situation, to any processing of your personal data necessary for the performance of a task carried out in the public interest or based on legitimate interest.

You have **the right to lodge a complaint** with the LTS or a data protection supervisory authority (for Luxembourg: Commission Nationale pour la Protection des Données) (https://cnpd.public.lu/en/index.html) if you feel that the processing of the personal data relating to you infringes the GDPR or other laws (Art. 77 GDPR).

Information Security

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 Microsoft Teams and the software tools and online services listed in Appendix 1, 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.

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 dpo@lts.lu.

Date of entry into force of the Privacy Notice and changes to it

This Privacy Notice may be updated according to LTS´s requirements and circumstances, or where required by Luxembourg Data Protection Legislation.

APPENDIX 1

We do not recommend you to share any private data with the other participants while using this Service and any of the software tools and online services listed in this Appendix 1.

You are solely responsible for complying with the terms and conditions for the software tools and online services listed in Appendix 1.

Software Tools and Online Services

This appendix describes the usage of software and services used at LTS and possible action required for students under 16 years old as per activities:

Action 1: Authorization to use this software and/or online service from parent(s) or legal guardian must be filled out via "Parental Agreement Form" at the beginning of the school year or sent to info@techschool.lu indicating:

- Parent name authorizing it
- Software / Online Service authorized
- Full name of the student
- Student email use in this Service

A1.1 General to all LTS Activities

Software / Online Service	Usage (Mandatory or Options)	Purpose	Action for students under 16 years old
Microsoft Teams (Software & Online Service)	Mandatory, Provided by the Ministry of Education via CGIE GDPR info	• Communication • File Sharing • Videoconferencing • Live Streaming	• For students with @school.lu or @student.eursc.eu email no action required, • For all others **Action 1** is required (see above)
Microsoft Outlook / Email (Online Service)	Mandatory, Provided by the Ministry of Education via CGIE GDPR info	• Communication	• For students with @school.lu or @student.eursc.eu email no action required, • For all others **Action 1** is required (see above)
Microsoft O365 Apps (Software & Online Service)	Mandatory, Provided by the Ministry of Education via CGIE GDPR info	• Online Forms	• For students with @school.lu or @student.eursc.eu email no action required, • For all others **Action 1** is required (see above)
Eventbrite (Online Service)	Optional Privacy Policy	• Courses, workshops, Events and Challenges registration • Only names and emails are collated via Eventbrite if	• Parent(s) or legal guardian need process the registration

		additional info is needed, Microsoft O365 Forms is used	
Google **(Online Service)**	Optional No registration required. Privacy Policy	• Searching information	**Action 1** is required (see above)
YouTube **(Online Service)**	Optional No registration required. Policies and Safety	• Classes and events video content	No action required
Bitly **(Online Service)**	Optional No registration required. Privacy Policy	• Short URLs redirect of Microsoft Forms or Eventbrite links	No action required
Microsoft Visual Studio Code **(Software)**	Optional No registration required. License Privacy Policy	• Text and Code Editor	No action required
Microsoft Visual Studio Community Edition **(Software)**	Optional Privacy Policy	• Code Editor	No action required
Discord (Software & **Online Service)**	Optional Registration is required. https://discordapp.com/privacy	• Communication • Off school LTS community	**Action 1** is required (see above)

A1.2 Level G0 and the Creative Coding Online Course and Art Challenge

Software / Online Service	Usage (Mandatory or Options)	Purpose	Action for students under 16 years old
p5.js Editor (Online Service) & libraries	Mandatory https://editor.p5js.org/ Free, open source JavaScript library. Created by the non-profit Processing Foundation https://processingfoundation.org/	• Creative Coding • Creation of animated graphics	• **Action 1** is required (see above) To be able to save files a free sign up with a name / email address is required.
Open Processing **(Online Platform)**	Mandatory To be able to save files a free sign up with a pseudonym is required. https://openprocessing.org	• Creative Coding • Creation of animated graphics	• **Action 1** is required (see above) To be able to save files a free sign up with a name / email address is required.
ml5.js (Software)	Mandatory https://ml5js.org/	• Creative Coding • Using pretrained Machine Learning Models for p5 sketches	No action required
Teachable Machine	Optional https://teachablemachine.withgoogle.com/		No action required

code.org (Online Service)	Optional https://code.org/tos	• Binary game	No action required

A1.3 Level One and the Game Development Online Course and Challenge

Software / Online Service	Usage (Mandatory or Options)	Purpose	Action for students under 16 years old
Unity Hub, Unity & Unity Asset Store (Software) https://unity.com/	Mandatory Registration required https://unity3d.com/legal/gdpr https://unity3d.com/legal/privacy-policy	• Game Development Engine • Management of Unity installations and projects. • Access to third-party game development assets	**Action 1** is required (see above)
Adobe Photoshop (Software)	Optional GDPR	• Creation of artwork	**Action 1** is required (see above)
Gimp (Software)	Optional No registration required. FAQ	• Creation of 2D artwork • Alternative to Photoshop	No action required
Krita (Software)	Optional No registration required. Privacy Statement	• Creation of 2D artwork • Alternative to Photoshop	No action required
Blender (Software)	Optional No registration required. Privacy Policy	• Creation of 3D artwork	No action required
PureRef (Software)	Optional No registration required. Privacy Policy	• Creation of Moodboards • Management of references	No action required
Piskel (Online Service)	Optional No registration required. Privacy Policy in FAQ	• Creation of 2D Pixel Art • Alternative to Photoshop	No action required
Anaconda https://www.anaconda.com/	Mandatory https://www.anaconda.com/privacy-policy	• Open-source toolkit with over 7,500 data science and machine learning packages makes it easier to perform any kind of data analytics using Python	**Action:** Download & Install
Thunkable (Online Service) https://thunkable.com/	Mandatory https://thunkable.com/#/privacy	• Design & prototyping mobile applications • Programming different functionalities	**Action 1** is required (see above)
Open Bank Project PSD2 Sandbox (Online Service) https://psd2-portal.openbankproject.com	Mandatory https://www.openbankproject.com/privacy-policy/	• Open-source API for simulating bank transactions	**Action 1** is required (see above)
Visual Studio Code https://code.visualstudio.com/	Mandatory https://privacy.microsoft.com/en-GB/privacystatement	• Visual Studio Code is a freeware source-code editor.	**Action:** Download & Install

A1.4 Level Up

Software / Online Service	Usage (Mandatory or Options)	Purpose	Action for students under 16 years old
CoCalc (Online Platform) https://cocalc.com	Mandatory Virtual online workspace https://cocalc.science.uu.nl/policies/privacy.html	• Programming Machine Learning models	**Action 1** is required (see above)
Voiceflow (Online Platform) https://www.voiceflow.com	Mandatory Platform to build chatbots https://www.voiceflow.com/privacy	• Implementation of voice and chat assistants	**Action 1** is required (see above)
Fitbit Studio & Fitbit OS Simulator (Online Service & Software) https://studio.fitbit.com	Mandatory Platform to create and test Fitbit-specific apps https://www.fitbit.com/global/us/legal/privacy-policy	• Development of Fitbit-specific applications for later installation on a physical device	**Action 1** is required (see above)
ROS Development Studio (Online Service) https://www.theconstructsim.com	Mandatory Platform to learn Robotics from Zero https://www.theconstructsim.com/privacy_policy/	• Development of robot control programs	**Action 1** is required (see above)
Runway ML (Online Platform) https://runwayml.com	Mandatory Machine Learning platform for creators https://runwayml.com/privacy-policy/	• Exploration and use of trendy machine learning models in a very intuitive way	**Action 1** is required (see above)
Gmail (Online Service) https://www.gmail.com	Mandatory Free email service provided by Google https://policies.google.com/privacy	• Account required to access and use Google platforms mentioned below	**Action 1** is required (see above)
Google Apps & Online Services dedicated to the use of AI and ML (e.g., Google Colab)	Mandatory Artificial Intelligence and Machine Learning products and services https://policies.google.com/privacy	• Exploration and development of deep machine learning models	**Action 1** is required (see above)