

Last updated: March 13, 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. Additionally, the online social media and social networking service company, Facebook Inc., is a sub-processor.

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

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 age, 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. For example, you will be asked to input if your age is between two certain values. 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 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:

- Partners: we must share your personal information with our partners in order to provide services to you. Examples include but are not limited to the launch of educational campaigns, development of new school programs, creation of other products or services, as well as enhancement of the current Service.
- 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 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 we consider necessary in order to fulfil the purposes for which we collect the personal information, in accordance with our legal obligations and legitimate Service's interests.

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; however, your information may remain in our records, unless you expressly request its deletion.

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](#), [Facebook Platform Policies](#) and [Facebook 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.