# **HighFour Competitions Privacy Policy**

HighFour Competitions, provided by EDSPARKS Bt. (company reg. number 01-06-792373) (**we** or **us** or **our**), is committed to preserving the privacy of all of its registered users. The information provided below explains how users' information (data) is collected, used, disclosed, and protected. By using this website and the services offered through it, all users agree to the collection, use, and disclosure of their information under the terms of this policy. Users are encouraged to read this policy and contact us with any questions or concerns about our practices described in this policy.

## Users under 18 years of age

Users that are under 18 years old, must obtain consent of their parent(s) and/or guardian(s) before allowing their teacher(s) to register them with any of their information or before registering themselves as individual (non-school registered) users. By using our website, these users confirm that they have obtained said consent and their parent(s) and/or legal guardian(s) are informed of their use our website.

## **Collecting personal information**

Direct registration on our website is available for thee distinct types of users:

- 1. Teachers whose school has subscribed to participate in the online competitions:
- These users are asked to provide their school's name, their name, and (preferably school-provided) email address. Those individuals who create an account but are not actively teaching at any of the registered schools will not have their accounts activated and as such will not have access to any of its (non-publicly available) features.
- 2. <u>Individual users</u> whose school has not subscribed to participate in the online competitions. These users are asked to provide their name, e-mail address, gender, country and city of their location, competition category, and nickname used for publicly displaying their achievements in competitions.
- 3. <u>Writers</u> whose main task is to manage competition questions and rounds These users are asked to provide their name, photo, a short bio, and e-mail address.

Secondly, in addition to the above personal information, we use our users' credit card and/or other payment method details (such as card type, name on the card, card number, expiry date, CV2 number, etc.) in order to process subscription or other payments made by our users. This may include annual subscription fees paid by schools or individual users or other purchases made on our website.

Thirdly, we collect some information from cookies and similar software (such as Google Analytics) to understand how our users arrive at or navigate our website. Information collected via these sources are used for statistical purposes only and to improve the services provided by us to our users.

We do not collect sensitive (political, medical, religious, etc.) information about our users.

## Using and disclosing personal information

In addition to personal information mentioned above, we collect, store, and to some extent share data on our website. This sharing includes the following:

- Students registered by teachers whose school has subscribed:
  - Students that participate in team competitions have their competition results shared with their teachers. If the team's results place the team in the overall top 4 teams (in their subject and category) then the team name and the school name, together with the achieved score, are shared publicly. Their *individual names*, however, are *not* shared publicly, thus the student can only be directly identified by teachers who created and named the teams in which the student was placed.
  - Students that participate in individual competitions have their competition results (rank), together with their chosen nickname, gender, and country shared publicly. Their individual names, however, are not shared publicly, thus the student cannot be directly identified by others.
- Students registered by themselves as individual users:
  - These students can participate in individual competitions only and as such have their competition results (rank), together with their chosen nickname, gender, and country shared publicly. Their individual names, however, are not shared publicly, thus the student cannot be directly identified by others.
- Writers registered by themselves:
  - The names, photos, and a short bio are shared publicly online.

Additionally, we reserve the right to provide the names and e-mail addresses of teachers to third parties for certain promotional services, such as <u>International School Community</u>, where our teachers are offered a free 6-month premium membership on their website. In addition to this, teachers' names and e-mail addresses may be shared with other education-related third parties that work together with us. However, personal information of students, whether registered by their teachers or by themselves as individual users, are *not* shared with any third-party websites.

Other than sharing teachers' names and e-mail addresses with third parties, we do not sell, trade, or otherwise transfer personally identifiable information to any of our registered users to third parties. This does not include trusted third parties who assist in operating its website, conducting its business, or provide services necessary for maintaining and improving our services provided. Non-personally identifiable information, such as school name, number of teachers/students, and alike, may be used for marketing purposes.

Users who do *not* consent sharing their information (such as names and e-mail addresses) with third parties must contact us via any of the methods listed below. By using our website and the services provided through it, all users consent to this Privacy Policy.

### **Security of personal information**

The information of users described in this Privacy Policy is secured by taking appropriate technical and organizational measures against its unauthorized or unlawful processing. Said information is stored on our servers in Hungary for as long as it is needed for the purposes of the website or as otherwise required by law.

### **Data Protection Office (DPO)**

Due to the type of data we collect and the nature of our business, we currently have no legal requirement to have a Data Protection Office (DPO). However, we are happy to address any queries and requests regarding the data we hold about you. For this purpose, we may be contacted via e-mail at admin@highfour.co or via the Contact Us page online.

#### **User consents and rights**

By requesting and gaining access to our website, all users consent to this Privacy Policy, as described in this document. Users also have the right to access and edit their personal information, as well as request deletion of said information. Such requests must be made in writing via either of the methods listed below, in which case deletion of personal information will be completed and access to our services will be withdrawn.

#### Third party websites

Occasionally, we may team up with third parties to improve our services or provide access to services of said third parties. Such third parties are responsible for having their own Privacy Policy. We are not responsible or liable for the content or activities provided by such third parties. In the event that our users decide to use the services of such third parties, we are not responsible or liable for any further consequences regarding the use of said services provided by third parties.

#### **Updating information**

Any changes to this Privacy Policy will be announced to users either via e-mail or on the website's announcement's page. In case of changes, only users with login access will be notified.

#### **Cookies**

Cookies are small pieces of data that are sent from a website and are stored on the users' computers. They are designed to allow websites to remember user's information or browsing activity. Our website uses cookies to understand and save your preferences for future visits.

## **Our details**

Visitors and users with login access may reach us via e-mail (admin@highfour.co) or via the Contact Us page any time.

This Privacy Policy was last updated on Thursday, May 24, 2018.