

# EOPE OÜ Privacy Policy

## 1. Introduction

- This section provides an overview of EOPE's commitment to privacy while using our Learning Management System (LMS), which is designed to facilitate the training and development of employees within organizations.
- It outlines the scope of the privacy policy, which applies to all personal and organizational data collected through the EOPE platform.
- Contact details for EOPE's privacy concerns are provided, emphasizing the availability of support for users with questions about data handling.

## 2. Personal Information Collection

- **Types of Data Collected:**
  - **Personal Identification Information:** Names, email addresses, job titles, and department details, crucial for creating and managing user profiles within the LMS.
  - **Organizational Information:** Information such as the company name, industry sector, and employee roles, used to customize and streamline the learning experience to match organizational structures and goals.
  - **Usage Data:** Insights into how employees interact with the LMS, including course progress, quiz scores, and time spent on training materials, which help in evaluating the effectiveness of the training programs.
  - **Cookies and Tracking Data:** Use of cookies and similar technologies to enhance user navigation on the LMS, personalize the learning content, and manage session logins.
- **Methods of Data Collection:**
  - **Direct Collection:** Data provided by the organization when setting up and customizing the LMS and by employees during registration and interaction with the platform.
  - **Indirect Collection:** Automated technologies that gather information about how employees use the LMS, assisting in functional improvements and user experience optimization.

## 3. Use of Data

- **Purpose of Data Use:**
  - **Training Management:** To administer and personalize training modules and paths tailored to specific organizational needs and employee roles.
  - **Account Management:** Managing user access and profiles to ensure that employees can interact with the LMS effectively.
  - **Service Improvement:** Using feedback and usage data to enhance the functionality and user-friendliness of the LMS, ensuring it meets the evolving needs of organizations.
  - **Communications:** Sending updates and notifications related to course offerings, system updates, and organizational announcements.
  - **Performance and Compliance Tracking:** Monitoring employee progress and completion of training to support organizations in meeting regulatory compliance and performance benchmarks.
  - **Legal Compliance:** Processing personal data in accordance with legal obligations, including data protection regulations.
- **Legal Basis for Processing:**
  - **Contractual Necessity:** Processing necessary for the execution of the contract between EOPE and the client organization, providing the LMS services.
  - **Consent:** Where applicable, obtaining explicit consent for non-essential data uses, such as receiving marketing materials.
  - **Legitimate Interests:** Processing based on the legitimate interests of EOPE or the client organization, such as improving service offerings and user experience, provided these interests do not override the rights of the individuals involved.

## 4. Data Sharing and Disclosure

- **General Policy:** EOPE values the privacy and security of its user data and does not share personal information with third parties except as described in this policy.
- **Third-Party Service Providers:** Data may be shared with service providers who assist in managing the LMS, such as hosting, cloud computing, and customer support services, under strict confidentiality agreements.
- **Affiliate Program:** EOPE partners with various organizations through its affiliate program. Personal and organizational data may be shared with these affiliates when they sell EOPE courses to their customers. This sharing enables affiliates to provide relevant course offerings and supports the overall distribution of EOPE's training solutions. All affiliates are required to uphold the privacy standards set forth in this policy.
- **Legal Requirements:** EOPE may disclose user data if required by law or in the good faith belief that such action is necessary to:
  - Comply with a legal obligation.
  - Protect and defend the rights or property of EOPE.
  - Prevent or investigate possible wrongdoing in connection with the service.
  - Protect the personal safety of users of the service or the public.
  - Protect against legal liability.
- **Business Transfers:** In the event of a merger, acquisition, or asset sale, user data may be transferred. Users will be notified via email and/or a prominent notice on our service of any change in ownership or uses of their personal data, as well as any choices they may have regarding their personal data.

## 5. Cookies and Tracking Technologies

- **Types and Use:**
  - **Cookies:** Small data files stored on the user's device (computer or mobile device) that help EOPE improve its service, enhance navigation, and perform essential functions like user authentication and session management.
  - **Tracking Technologies:** Scripts, tags, and other technologies used by EOPE to track website activity, gather demographic information about our user base, and monitor and analyze the use of our service.
- **User Control and Preferences:**
  - Users can control the use of cookies at the individual browser level. If you reject cookies, you may still use our site, but your ability to use some features or areas of our site may be limited.
  - EOPE provides users with setting options to manage their cookie preferences directly within their account settings on the LMS platform.

## 6. Data Security

- **Security Measures:** EOPE implements a variety of security measures designed to maintain the safety of your personal information when you enter, submit, or access your personal information. These include the use of encryption, firewalls, and secure software.
- **Data Integrity and Secure Storage:** EOPE takes reasonable steps to ensure that personal data we process is reliable for its intended use, accurate, complete, and current to the extent necessary for the purposes for which we use the data.
- **Incident Response:** In the case of a data breach, EOPE has procedures in place to notify affected users and regulators in a timely manner where we are legally required to do so.
- **User Role and Responsibility:** It is important for users to protect against unauthorized access to your password and to your computer or device. Be sure to sign off when finished using a shared computer.

## 7. User Rights

- **Overview of Rights:** Users of EOPE's LMS have various rights concerning their personal data, which include:
  - **Access:** The right to be informed of and request access to the personal data we process about them.
  - **Rectification:** The right to request that we amend or update their personal data where it is inaccurate or incomplete.
  - **Erasure:** The right to request that we delete their personal data.

- **Restrict:** The right to request that we temporarily or permanently stop processing all or some of their personal data.
- **Object:** The right to object to us processing their personal data on grounds relating to their particular situation.
- **Data Portability:** The right to request a copy of their personal data in electronic format and the right to transmit that personal data for use in another party's service.
- **Exercising Rights:** EOPE provides users with the means to exercise these rights through the LMS interface, where they can access, review, and modify their data. For data erasure or any objections, users may contact our designated data protection officer whose contact details are provided in the policy.

#### 8. Data Retention

- **Retention Period:** EOPE retains personal data only for as long as necessary to fulfill the purposes it was collected for, including for the purposes of satisfying any legal, accounting, or reporting requirements.
- **Criteria for Determining Retention Periods:** The criteria used to determine the retention periods include:
  - The length of time users remain active in our system.
  - Whether there is a legal obligation to which EOPE is subject (such as tax laws requiring records to be kept for a certain period).
  - Whether retention is advisable considering our legal position (such as regarding applicable statutes of limitations, litigation, or regulatory investigations).

#### 9. International Data Transfers

- **Transfer Mechanisms:** Personal data processed by EOPE may be transferred to, stored, and processed in a country other than the country in which it was originally collected. In such cases, EOPE complies with legal frameworks that provide adequate protection for the transfer of personal data.
- **Safeguards:** EOPE employs appropriate safeguards to ensure that the personal data is securely transferred and that the rights of data subjects are protected. This includes adhering to standard contractual clauses approved by the European Commission or ensuring that the country to which the data is transferred has been deemed to provide an adequate level of data protection.

#### 10. Policy Updates

- **Notification of Changes:** EOPE may update this privacy policy from time to time. We will notify users of any changes by posting the new privacy policy on the LMS platform and updating the "last updated" date at the top of this policy.
- **Review Encouraged:** Users are encouraged to review this privacy policy periodically for any changes. Changes to this policy are effective when they are posted on the LMS platform.

#### 11. Contact Information

- **Queries and Concerns:** Users with questions, concerns, or complaints about this privacy policy or EOPE's data practices can reach out to:
  - **Data Protection Officer (DPO):** Contact details for EOPE's designated DPO, including email and phone number.
  - **General Support:** Additional contact options for general inquiries, such as a support email or helpdesk phone number.
- **Office Address:** Provide the physical mailing address for EOPE, which users can use for official correspondence.
- **Responsive Communication:** EOPE commits to responding to all inquiries or concerns within a reasonable timeframe, emphasizing our dedication to user privacy and support.

#### 12. Third-Party Websites and Services

- **External Links:** The EOPE LMS may contain links to external websites not operated by EOPE. These links are provided as a convenience and do not imply endorsement of the material on such websites or any association with their operators.
- **Privacy Practices:** Alert users that when they follow a link to another site, they are then subject to that site's privacy and security practices, which may differ from those of EOPE.
- **No Liability:** EOPE disclaims any responsibility for the content, privacy policies, or practices of any third-party websites or services. Users are encouraged to review the privacy statements of

any other site they visit to understand their procedures for collecting, using, and disclosing personal information.

### 13. Children's Privacy

- **Restriction of Use:** EOPE's LMS is not directed at individuals under the age of 18. We do not knowingly collect or solicit personal information from anyone under the age of 18 or knowingly allow such persons to register for the service.
- **Age Verification:** Procedures in place to verify the age of users upon registration, ensuring compliance with age restrictions.
- **Reporting:** If we learn that we have collected personal information from a child under age 18 without verification of parental consent, we will take steps to remove that information from our servers as quickly as possible.
- **Parental Notice:** Emphasize that any collection of personal information from children under the age of 18 should be reported immediately to EOPE's privacy team.

### 14. Additional Information about EOPE OÜ

#### Data Protection Officer (DPO):

- **Name and Title:** Priidik Roos, Data Protection Officer
- **Contact Email:** priidik@eope.ee
- **Direct Contact:** For any concerns or inquiries related to data protection, please contact the DPO directly through the provided email.

#### Company Contact Information:

- **Official Registered Address:** Tartu mnt 83-702, Tallinn, Estonia
- **General Support Email:** info@eope.ee
- **Helpdesk Phone Number:** +372 58805104

#### Compliance and Governance:

- **Data Protection Compliance:** EOPE OÜ is committed to maintaining compliance with the General Data Protection Regulation (GDPR), ensuring the protection and privacy of all personal data under our stewardship.
- **Corporate Governance:** EOPE OÜ adheres strictly to GDPR guidelines in all operations, reflecting our commitment to data privacy and security. Our governance practices are designed to ensure transparency, accountability, and continuous improvement in our data handling processes.