



# Privacy Notice 2022

Safeguards your data with  
COOL



# Introduction

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Dear reader,

The European GDPR has created a ripple of changes in data protection & privacy law across the world. These laws regulate how the business collects, processes, stores and transfers personal data. All organizations, regardless of location, need to be mindful of data protection and comply with relevant local laws and contract provisions.

As complicated as the European GDPR is, in this notice we'd like to make this as transparent and easy to understand as possible for you. Our goal is to inform you about the European GDPR as well as about the services we provide, and our mission to safeguard your data along the way.

COOL is a product and brand of Cloudwise, a Europe based firm. You can count on the fact that we are committed to GDPR compliance across our services. We are also committed to helping our customers with their GDPR compliance journey by providing robust privacy and security protections built into our services and contracts over the years.

As the COOL team, we recognize that your privacy is very important. We strictly follow the 'lawfulness, fairness and transparency' principle as mentioned in Art.5 of the GDPR. The data we process are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

We are committed to providing the best possible care and services for all our clients. As the developer and provider of an online educational learning platform, we need to collect information to connect our users and deliver personalized service for our clients and to meet government regulatory requirements.

The COOL privacy notice explains how and why your information will be collected, held, used and disclosed. It also details the measures that are in place to prevent unauthorized access to your information, and our qualifications when it comes to safeguarding your data and information.

**Team COOL**



## Your privacy is our priority

As the COOL team, we recognize that your privacy is very important. We are committed to providing the best possible care and services for all our clients. As the provider of an online educational learning platform and related products, we need to collect information to connect our users, deliver personalized service for our clients and to meet government regulatory requirements.

## Why do we collect your data?

COOL collects and processes your data for the following purposes:

- ❖ Providing educational institutions with technical support when it comes to classroom supervision and student activities monitoring. Giving educational advice and analysis for the purpose of optimizing the learning process, if you use modules such as the COOL plagiarism check;
- ❖ Guiding and supporting teachers and other employees within the educational institution;
- ❖ Delivery of its main services;
- ❖ Obtaining access to the services offered and to external information systems, including identification, authentication and authorization;
- ❖ Check and prevention of abuse and misuse and the prevention of inconsistency and unreliability in processing personal data;
- ❖ Performing maintenance, making a backup, making improvements after detected errors or inaccuracies and getting support;

- ❖ Making personal data available to the extent necessary to fulfil any legal requirements.

## What data do we collect and process?

COOL collects and processes the following personal data from students, teachers and parents/guardians of students:

- ❖ Communication needed data such as contact details: names, initials, titles, email addresses, roles;
- ❖ Google Ids, Microsoft Ids and administration number that identifies the student;
- ❖ Data of the parents/guardians of education participants and only if the school also chooses to synchronize parent data from the administration system;
- ❖ Data regarding the organization of education and making teaching materials available;
- ❖ Other anonymized usage statistics to study how certain applications are used.



## Data processing as a part of the COOL service

COOL data processing is an inseparable part of the service we offer. We use the data collected in order to deliver the following services:

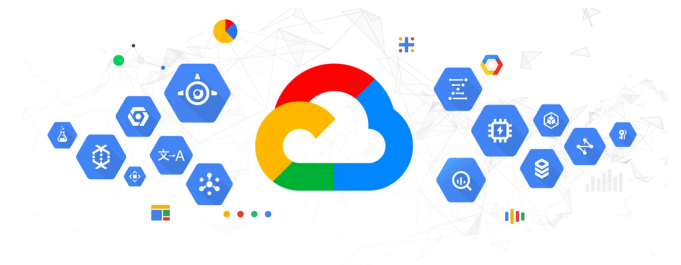
- ❖ Link with Google Workspace for Education for creating and synchronizing user accounts and user groups;
- ❖ Link with Microsoft 365 for creating and synchronizing user accounts and user groups;
- ❖ Storage of name data of students and teachers;
- ❖ Storage of the year, lesson and other information regarding the nature and progress of the education;
- ❖ Storage of user statistics to do trend analysis based on anonymized information and to report on this to the user;
- ❖ Improve the user experience by using cookies.



## Where do we store data?

We use the Google Cloud Platform (GCP) for the processing and storage of data. The collected user information is stored and processed on the GCP in accordance with the GDPR.

For more information on how Google stores and secures its user data please refer to the resources section of this privacy notice.



## How long do we store data?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or security requirements.

Because these needs can vary for different data types in the context of different products, services or use-cases, actual retention periods can vary significantly. However upon expiration or termination of the user agreement, our admin will hand over the access to user data back to the customer.

## How do we safeguard your data with Google Cloud Platform?

COOL uses the cloud servers of the Google Cloud Platform to store your data. Google Cloud Platform uses sufficient safeguards in case of any transfer of Company Personal Data to countries outside the EEA. You can find more information about how Google handles its user data [here](#).

As a Google for Education Premier Partner, we are committed to providing and continuing to advance technical, legal, and organisational safeguards that will support you in assessing the risk of data transfers in the context of using Google Cloud Platform.



## International data transfers

COOL guarantees that we will not transfer or authorize the transfer of data to countries outside the EU and/or the European Economic Area (EEA) without your prior written consent. We ensure that your personal data is protected when it's being transferred from a country within the EEA to a country outside the EEA.



## Our product security, standards and certifications

Our products and services regularly undergo independent verification of their security, privacy and compliance controls, achieving certifications against standards around the world, such as those from ISO ([ISO 27001](#); [ISO 9001](#)).



We also have security officers who have been appointed from an organizational point of view to identify risks related to the processing of personal data, to stimulate security awareness, to monitor

provisions and to take measures to ensure compliance with the information security policy.

In addition, we follow the “Privacy by Design” methods and give your privacy priority when developing and testing new functionalities. We have been providing robust privacy and security protections built into our services and contracts over the years.

For example, customer data is secured through highly encrypted links; passwords of our administrator accounts are reset every 24 hours in a random password of variable length that is above 22 characters with the highest degree of complexity in numbers, letters and symbols to ensure maximum safety.

For our existing customers who want to learn more about COOL's qualification and certification, we'd be happy to facilitate detailed information via your account manager.

# Conclusion

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You can count on the fact that COOL is committed to GDPR compliance across our services. We have been providing robust privacy and security protections built into our services and contracts over the years. Along with the safeguards and commitments discussed above, we firmly believe that COOL provides our customers with adequate protection for their data. As a COOL customer, you have the right to access, verify and update your personal information at any time.

## **Where should you start?**

In the COOL data processing agreement, we lay down rights and obligations regarding processing and collecting your data. By signing this document, we will come to a mutual agreement protected by the Data Protection Law.

**Should you have any questions** relating to information in this Privacy Policy or if you require further details about our privacy policies and practices please contact the manager of your service or the COOL Privacy Officer. Please be assured, we are committed to safeguarding your privacy.

We hope this notice is helpful for you when it comes to conducting compliance risk assessments, but encourage you to consult with legal counsel as this notice should not be used as a substitute for legal advice.

# Resources

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1. Google  
[Privacy resources center](#)
2. Google  
[Cloud privacy notice](#)
3. Google  
[Workspace for Education data protection implementation guide](#)
4. Google  
[Workspace security whitepaper](#)
5. Google  
[GDPR resource center](#)
6. COOL by Cloudwise  
[ISO 9001](#)
7. COOL by Cloudwise  
[ISO 27001](#)





## About COOL

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COOL is an all-in-one online learning suite that empowers learning, saves teaching time and simplifies school's IT with the best of Google Workspace for Education and unique classroom management tools combined. With our free COOL Platform and premium COOL modules we empower 1,800+ schools around the world every day!

**Do you have questions about this notice?**

[Contact us](#)



COOL - Your digital classroom. Wherever you are.

COOL is a  
product of  **cloudwise**

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