

# Privacy Policy of the EduWallet System

## §1. General Provisions

This Privacy Policy sets out the rules for processing personal data of users utilizing the EduWallet system.

The data controller is **Fundacja Szkolna**, located at **\*\*ul. Obrzeżna 12A, 02-691 Warsaw, Poland\*\***, registered in the National Court Register (KRS) under number **0000038806**, with **NIP: 521-222-05-42**, responsible for managing the EduWallet system (hereinafter referred to as the "Controller").

**Z3X Sp. z o.o.**, with its registered office in **Gdańsk (Aleja Grunwaldzka 223, 80-236 Gdańsk, NIP: 5842801536, KRS: 0000882886)**, is the entity processing personal data on behalf of the Controller.

The processing of users' personal data is carried out in accordance with the **General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016)**, as well as other applicable legal provisions concerning personal data protection.

## §2. Scope of Processed Personal Data

As part of using the EduWallet system, the Controller may process the following personal data of users:

- First name and last name,
- Email address,
- Phone number (optional),
- Information related to activities within the system (e.g., tasks, projects),
- Technical data, such as IP address, login details, and system activity.

These data are collected to provide services related to the EduWallet system, particularly for managing user accounts, project execution, and ensuring system security.

## §3. Purposes of Data Processing

Personal data are processed for the following purposes:

- Providing access to the EduWallet system and its functionalities,
- Managing user accounts and enabling system use,

- Optimizing system performance and monitoring efficiency,
- Ensuring data security and preventing abuse,
- Communicating with users, including handling inquiries and technical issues,
- Complying with legal obligations imposed on the Controller.

## §4. Legal Basis for Data Processing

Personal data are processed based on:

- **Article 6(1)(b) GDPR** – processing necessary for the performance of a contract to which the user is a party (use of the EduWallet system),
- **Article 6(1)(c) GDPR** – compliance with legal obligations to which the Controller is subject,
- **Article 6(1)(f) GDPR** – the legitimate interest of the Controller, such as ensuring system security and proper functioning.

## §5. Sharing of Personal Data

The Controller may share users' personal data only with:

- **Entities processing data on behalf of the Controller** (e.g., IT service providers) under a data processing agreement,
- **Public authorities and legal entities**, if required by law.

Personal data will not be transferred to third countries (outside the European Economic Area) unless the user gives explicit consent or it is necessary for service delivery.

## §6. Data Retention Period

Users' personal data will be retained for the period necessary to achieve the purposes for which they were collected:

- For the duration of the contract (use of the system),
- For the period required by law (e.g., document archiving),
- Until an objection is raised regarding processing based on the legitimate interest of the Controller.

## §7. Users' Rights

Users have the following rights concerning personal data processing:

- The right to access their personal data,
- The right to correct data if they are incorrect or outdated,

- The right to request data deletion (“right to be forgotten”) in specific cases,
- The right to restrict data processing,
- The right to transfer data to another controller,
- The right to object to data processing based on the legitimate interest of the Controller,
- The right to file a complaint with the supervisory authority (**President of the Personal Data Protection Office**) if data protection laws are violated.

## §8. Data Security

The Controller applies appropriate technical and organizational measures to protect users' personal data from accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or access.

Access to personal data is granted only to **authorized individuals** who are obligated to maintain confidentiality.

## §9. Changes to the Privacy Policy

The Controller reserves the right to modify this Privacy Policy in case of changes in legal regulations, technology, or system operations.

Users will be informed of changes to the Privacy Policy through appropriate notifications on the EduWallet platform. Continued use of the system after the introduction of changes constitutes acceptance of the new terms.

## §10. Contacting the Controller

For any questions or comments regarding this Privacy Policy or personal data processing, users can contact us via email at: **hi@z3x.io**.