

Privacy Policy

Last Updated: 17 June 2025

Welcome to our Mobile Application (“App”), designed for use in educational environments by students, teachers, and schools. This Privacy Policy explains how we collect, use, disclose, and protect your information when you use our App and the associated Admin Panel (“Platform”). We are committed to safeguarding the privacy of children and ensuring compliance with the General Data Protection Regulation (GDPR).

1. Who We Are

We are the data controller responsible for processing your data under this Privacy Policy. If you have any questions, please contact:

Nokia Corporation

Email: [Insert Email]

Address: [Insert Address]

2. What Data We Collect

We collect the following categories of personal and technical data:

For Students:

- **User identifier** (pseudonymized, not real names)
- **Camera input** (used only in real-time for object recognition; no images stored)
- **Interaction data** (flashcard completion, robot actions)
- **Device information** (model, OS, anonymized device ID)

For Teachers and Administrators:

- **Login credentials**
- **Class and assignment data**

- **Robot usage assignments**
 - **Interaction logs and analytics**
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3. How We Use the Data

We use data solely for educational and operational purposes:

- To enable robot interaction and model training
- To manage student assignments and learning progress
- To maintain app performance and security
- To improve educational content based on usage trends

We **do not** use student data for marketing or profiling purposes.

4. Legal Basis for Processing

We process data under the following lawful bases:

- **Consent** (from parents or legal guardians for children under 16)
 - **Public interest in the area of education**
 - **Legitimate interests** (ensuring functionality, safety, and pedagogical effectiveness)
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5. Parental Consent

We require verifiable parental or school administrator consent before collecting personal data from children under 16. Schools act as intermediaries to manage consent.

6. Data Sharing and Disclosure

We do not sell or rent your personal data. We may share data with:

- **Educational institutions** using the Admin Panel
 - **Service providers** strictly for hosting or maintenance under data processing agreements
 - **Regulatory authorities**, if required by law
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7. Data Retention

- Student data is retained only for the duration of the school term or as required by the school.
 - Admin data is retained for as long as necessary for school operations.
 - Users or schools may request data deletion at any time.
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8. Security Measures

We implement appropriate technical and organizational measures to secure data:

- End-to-end encryption of data in transit
 - Role-based access control
 - Pseudonymization and minimal data collection
 - Regular security audits
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9. Your Rights

Under GDPR, you have the right to:

- Access your personal data

- Correct inaccurate data
- Erase your data ("right to be forgotten")
- Restrict or object to processing
- Data portability

To exercise these rights, please contact us at [Insert Contact Email].

10. International Transfers

All data is processed and stored within the European Economic Area (EEA). If data is transferred outside the EEA, we ensure it is protected by appropriate safeguards (e.g., Standard Contractual Clauses).

11. Changes to this Policy

We may update this Privacy Policy periodically. We encourage you to review it regularly. Significant changes will be notified through the App or school communication channels.

Contact Us

For questions, complaints, or data access requests, please contact:

[Insert Company]

Email: [Insert Email]

Address: [Insert Address]