

PRIVACY POLICY

We at Superzナルac (refers to SUPERZナルAC d.o.o.", with headquarters in Zagreb, Bosiljevska ulica 47A, further Superzナルac or Company) take care of your privacy.

We have prepared this Privacy Policy to clarify how we process (collect, use and share) your Personal Data in connection with our **web platform** located on the domain: <https://superclever.world/> ("**Privacy Policy**").) This Privacy Policy governs the manner in which the Company collects, uses and manages your data, including personal data, when you are a registered user (hereinafter: "You").

Except where expressly provided otherwise in this Privacy Policy, the terms used herein have the meaning given to them by REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC ("**General Data Protection Regulation**" or "**GDPR**")."

This Policy applies only to natural persons ("data subjects") or their personal data. The handling of information from legal entities (such as information considered to be a trade secret, professional secret and classified information) is not subject to this Policy.

Personal data

For the purposes of this Privacy Notice, the term "Personal Data" refers to any data relating to an identified or identifiable natural person. Therefore, it is any information that directly identifies a natural person or through which a natural person can be identified, such as name, surname, address, personal identification number (OIB), address, e-mail and IP address. Identification may be directly by the information itself or in connection with any other information in our possession or likely to come into such possession.

Controller and processor

SUPERZナルAC ("we", "us" or "our") acts as the Controller in connection with the processing of your Personal Data covered by this Privacy Policy in terms of applicable data protection regulations. This means that SUPERZナルAC decides on how these Personal Data are processed and for what purposes they are processed.

When users with the roles masteradministrator, administrator, teacher enter the personal data of other data subjects, except their own, on our web platform, then Superzナルac acts as a processor of personal data.

Types of Personal Data processed and purposes of processing

As part of the registration process, we collect and continue to process information about your name, surname, email address, username and password.

Our Web platform is primarily intended for teachers who perform programs within the Superclever franchise network and use it for the purpose of conducting lessons within programs and collecting different records, and is also intended for parents who can check information about the programs attended by their child, therefore it is possible to collect personal data such as username, surname, country, city, school within franchise network, date of birth, the role of the user on the web platform, and in order to be able to enter data on the results achieved, programs that individual participants enter for the purpose of keeping records of attendance of the program and payments of membership fees.

We collect personal data of data subjects directly, when the data subject himself opens a user profile and enters his personal data directly on the web platform, and indirectly when persons (processing managers) authorized by the data subjects (such as parents of children attending programs in one franchise office) create user profiles and enter personal data on our web platform.

Personal data entered by users with masteradministrator, administrator and teacher roles in order to create user profiles of participants are collected and processed only to the extent necessary for the performance of contractual obligations towards these users, in which case we act as data processors.

We use all of these Personal Data primarily for the purpose of creating a user account and registering on our platform and enabling the use of digital content on the platform, with the aim of enabling the execution of the superclever program and monitoring activities within the superclever program.

We may also use your email address to send you notifications related to your use of the platform services, such as notifications of expected downtime, and to respond to your inquiries addressed to our customer support. We further use your email address to send you notifications of new content and functionalities, advice for using the platform with our new products and services, or the like.

Legal basis for the processing of Personal Data

All types of your personal data are processed on the basis of CONSENT (when the data subject gives consent to the processing of his or her personal data for one or more specific purposes); in order to FULFIL CONTRACTUAL OBLIGATIONS (in cases, processing is necessary for the performance of a contract to which the data subject is a party or in order to take action at the request of the data subject before the conclusion of the contract); Legitimate interest (where processing is necessary for the purposes of the LEGITIMATE INTERESTS pursued by the data controller or of a third party, except where these interests override the interests or fundamental rights and freedoms of the data subject which require the protection of personal data, in particular if the data subject is a child), LEGAL OBLIGATIONS (for the purpose of complying with applicable legislation).

Data on digital content and digital services

When you use our web platform, we also store electronic data, text, messages, communications or other materials delivered, produced or created and stored within the

platform by you, as well as information about the activity and results achieved within the platform, which may include Personal Data.

Legal requirements

We may also use registration and service data for the purpose of asserting, exercising or defending legal claims.

Cookies

When you access the platform's website and/or use digital content and digital services within our platform, we store certain information from your browser using "cookies". A cookie is a small amount of data stored on the user's computer with user information. We use this information to manage the platform and our technical solutions, understand how visitors navigate the platform and related websites, improve your experience on our platform, improve our services, and ensure the security of our platform.

Please refer to our Cookie Notice for more information about cookies and how you can change your settings for the purpose of deleting or rejecting cookies.

Recipients of Personal data

We share your Personal Data obtained through your registration and use of our platform with the following third parties:

- **Service providers and/or processors** or external organizations that assist us in the business and/or processing of Personal Data on our behalf and according to our instructions (e.g. our accountants, IT operators, legal support, etc.)
- **Third-party recipients who use Personal Data for legal reasons.** We may disclose your Personal Data, on a legal basis, if necessary for the establishment, exercise or defence of legal claims, to third parties such as courts, administrative authorities, data protection supervisory authorities, our legal advisers, etc.
- **Other controllers.** For the purpose of using our platform, your Personal Data is not shared with third-party organizations that determine the purposes and means of processing on their own behalf, such as schools, teachers or other web platforms, but in the event of any change, we will notify you through changes to this Privacy Notice, which is constantly available to you, and unless another permitted legal basis is suitable for such sharing, then we will specifically ask for your consent.

Within the web platform , Masteradministrator, Administrator, Teacher have access to user profiles and personal data of other respondents, but only to the extent limited and necessary for the conducting activities within the superclever program. Service providers and/or processors and their selected staff may access and use your Personal Data only on our behalf to perform certain tasks for which they have been engaged, as directed by us, and are obliged to keep your Personal Data secret and secure.

Transfer of personal data to third countries

Where we would have to share your Personal Data with an entity located outside the EEA, including countries that have a different standard of personal data protection than those currently in force in the EEA, in accordance with applicable legal requirements, we will apply appropriate safeguards to ensure the same protection of your Personal Data as enjoyed in the EEA pursuant to Article 46 of the GDPR.

These safeguards may include (i) acceptance of standard data protection clauses approved by the European Commission that provide protection for your Personal Data; and (ii) accepting binding corporate rules (you have the right to require us to have a copy of those clauses or policies by contacting us as set out below). In cases provided for by law, in relation to transfers, we may rely on derogations set out in Article 49 of the GDPR, such as your explicit consent. We will inform you in a timely manner of any such transfers outside the EEA and of the safeguards/derogations put in place to protect your Personal Data.

Storage of Personal Data

We take all reasonable steps to ensure that your Personal Data is processed within the minimum period necessary to achieve the purposes of this Privacy Policy. The criteria for determining the storage period of your Personal Data are:

(a) SUPERZNALAC will store your Personal Data in a form that allows identification only during: (i) your use of our web platform as defined by our General Terms of Use or (ii) for which your personal information is necessary in relation to the purposes set out in our General Terms of Use and this Privacy Notice, and we have a valid legal basis. Duration Your contract i.e.

(b) in other cases, your Personal Data may be kept for: (i) any applicable limitation period (i.e. any period within which a person might file a legal claim against us), and (ii) an additional 2 months after the expiration of the applicable limitation period (in order to be able to identify any Personal Data of a person who might apply at the end of the applicable period), and

(c) in addition, if any relevant legal requests have been made, we may continue to process your Personal Data for the period necessary to resolve such requests.

During the periods set out above in points b (i) and c (ii), we will limit our processing of your Personal Data to the storage and maintenance of the security of that data, except to the extent that it is necessary to review the data in connection with any request or any obligation in accordance with applicable law.

After the expiration of the period above referred to in paragraphs (a), (b) and (c), (i) we will permanently delete or destroy the relevant Personal Data or (ii) anonymize the relevant Personal Data, in particular in relation to child data.

Your rights regarding the processing of your Personal Data

You have the right to request from us **access** to and **rectification** or **deletion** of Personal Data or **restriction of processing** in connection with you, as well as **the right to data portability**, in accordance with the conditions prescribed by law, which include in particular:

Access to your personal data in accordance with Art. 15. Of the General Data Protection Regulation, i.e. the right to ask Us to confirm whether your personal data are being processed and, if such personal data are processed, access to such data and information about the purpose of the processing, categories of personal data, recipients or categories of recipients, the envisaged period for which the data will be stored or the criteria used to determine that period, as well as access to your personal data that we process, all available information about the source of the data, if the personal data has not been collected from the data subject, the possible existence of automated decision-making, which includes profiling referred to in Article 22, paragraphs 1 and 4. The general data protection regulation and, at least in those cases, meaningful information on the logic involved, as well as the importance and envisaged consequences of such processing for the data subject.

Rectification of inaccurate personal data, i.e. the right to obtain without undue delay the rectification of inaccurate personal data concerning you. Taking into account the purposes of the processing, you have the right to supplement incomplete personal data, including by providing an additional statement.

Portability of personal data or the right to download and request the transfer of your personal data. In exercising your right to data portability, you have the right to have one controller transmitted directly to another where technically feasible.

Erasure or right to request the termination of processing, or even the erasure of personal data held by us without undue delay and under the conditions specified in the applicable data protection regulations. If we have made the personal data public and we are obliged to erase them, we shall take reasonable steps, taking into account available technologies and implementation costs, to inform third parties processing the personal data that the data subject has requested that any links to them or copies or replications of those personal data be deleted.

If your personal data is necessary to perform certain contractual obligations of the Company towards you, the Company will not be able to perform such contractual obligations. If your data is processed for the purpose of achieving the company's legitimate interest, or if your personal data is necessary in order for the Company to comply with certain legal obligations (e.g. tax regulations), your request may not be possible to comply with.

Restriction of processing

You have the right to request that the Company restrict access to your data and/or third parties in certain processes or completely, if one of the following conditions is met:

- you dispute the accuracy of the personal data;
- the processing is unlawful and you oppose the erasure and request the restriction of your use instead;

- the controller no longer needs the personal data for the purposes of the processing, but you, as a data subject, request them for the establishment, exercise or defence of legal claims;
- you have objected to processing pursuant to Art. 21.st. 1. Of the General Data Protection Regulation, and it has not yet been established whether the legitimate reasons of the controller outweigh your reasons.

Right to object

If you are not satisfied with the way we collect or use your personal data, you always have the right to personally file a complaint with the competent supervisory authority, in the Republic of Croatia Personal Data Protection Agency. Contact details of the Croatian Data Protection Supervisory Authority are: Personal Data Protection Agency – AZOP, E-mail: azop@azop.hr, Website: www.azop.hr

Each data subject shall have the right granted by the European legislator to **object**, on grounds relating to his or her particular situation and at any time, **to processing of personal data concerning him or her, which is based on a legitimate interest** pursuant to Article 6(1) (f) of the GDPR. In the event of such objection, we shall no longer process your Personal Data, unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or for the establishment, exercise or defence of legal claims.

Where the processing is based on your consent in accordance with Article 6(1)(a) of the GDPR, you have the right to withdraw your consent at any time. The withdrawal of consent will not affect the lawfulness of processing based on consent before it was withdrawn.

You can withdraw your consent to the processing of your e-mail address for the purpose of sending notifications about new content and functionalities, advice for using our platform, our new products or similar, by clicking on the link contained in any such notice expressing your wish to no longer receive notifications of this kind. You can additionally withdraw your consent to the processing of your e-mail address for this purpose at any time by e-mail: support@superclever.eu or info@superclever.eu or in writing to the address of SUPERZNALAC headquarters.

In relation to the withdrawal of consent to the processing of your personal data for the setting of "cookies" as stated earlier, please refer to our Cookie Notice (hyperlink).

Please note that in certain cases provided for by law, we are unable to comply with or fully comply with your requests to exercise your rights, e.g. to comply with our legal obligations, or for the purpose of setting up, exercising or defending legal claims, there is a possibility that we will have to keep certain of your Personal Data even after you have requested deletion.

Automated decision-making

The processing of Personal Data described in this Privacy Policy does not include automated decision-making.

Contact details of the Controller

To ask questions or comment on this Privacy Policy and our data protection practices or to file a complaint about our compliance with applicable data protection regulations you can contact us by email: info@superclever.eu

We will take note and investigate any complaint about how we manage Personal Data (including a complaint that we have violated your rights under applicable personal data protection regulations).

Children under the age of digital consent

We appreciate the fact that children are a particularly vulnerable group of users. As such, children deserve extra attention and privacy protection. For this reason, we treat children's data with special caution to ensure that their parents are in control and that we collect and process only the minimal information we need to make the use of our web platform functional.

Only an adult and a capable person can create a user account on our platform . When an adult User enters information about a child as a participant of selected programs, we collect information about the age of the participant and his user name under which he will be recorded on our web platform. The username does not have to be the personal name of the student. **Our General Terms of Use are accepted by an adult User who is authorized on behalf of the child or a minor who is a minor to note that the child's personal data will be processed in accordance with this Privacy Policy.**

Safety and security measures

Registered user data is stored in a MySQL database on a server superclever.world. Access to data is limited by system users depending on their roles. Access to data is ensured by RBAC rules that are implemented within the system.

Personal data is located on a virtual server located on the AWS lightsail service where the MySQL database is installed. The IP address of the system may vary depending on the relocation, but constantly the system should be available at the address superclever.world.

Various technologies and methods are used to protect data from "hacking", including Nuxt, Vue.js, FastAPI, NuxtAuth, and FastAPI authentication mechanism. These technologies provide a robust framework for authentication, authorization, and data encryption, preventing unauthorized access. Also, regular security checks, including vulnerability scanning and code audits, further reinforce protection against potential threats. Working with a trusted hosting provider, such as AWS, enables the application of the latest standards in infrastructure protection and regulatory compliance, thus providing an additional layer of security.

Changes to this Privacy Notice

If we change the way we treat your Personal Information in connection with your use of our platform, we will update this Privacy Policy. We reserve the right to change our practices and this Privacy Notice at any time, so we encourage you to check the Privacy Policy frequently to be informed of any updates and changes to this Notice.