

# Privacy Policy

## of the bloomcoding.com website

We appreciate your interest in our services and would like to give you some important facts about how we manage and protect your personal data.

**Bloomcoding.com** is fully committed to protecting the privacy of the personal data of our customers, partners and suppliers. This privacy policy is intended to help you understand what information we collect, why we collect it, and how you can update, manage, export and delete your information. The policy also contains the security measures that **bloomcoding.com** takes to protect such data and your rights in relation to it.

By "**bloomcoding.com**" we mean any web page (website, landing page, subdomain, etc.) owned, managed or under the bloomcoding.com umbrella. By using this website, you consent to the collection, processing and transfer of your data as described in this policy.

Please check this section regularly as the policy may be subject to change or update. Any significant changes to this policy will be notified.

In addition to this policy, please refer to **the Terms and Conditions** and **Cookie Policy**.

The information collected on our platform falls under the scope of the General Data Protection Regulation 2016/679 (Regulation (EU) 2016/679), also known as GDPR and the Directive on Privacy and Electronic Communications (2002/58/EC).

If you need further information about how we use your personal data, you can write to us using the contact details.

### Who are we?

We are a digital academy for children. We empower them to succeed by teaching the skills required of a 21st century digital, information and global society.

### Registration dates:

Bloombrain OÜ, registered on 13.09.2021, at Ahtri tn 12, Tallinn, 10151, Estonia, Fiscal Code: 16314568.

### Contact dates:

- ❖ By email to the following address: [support@bloomcoding.com](mailto:support@bloomcoding.com)

## Using our platform

By accessing or using any part/function of our website, you agree to abide by the terms, conditions and policies mentioned and/or hyperlinked and acknowledge that you are of legal age in accordance with applicable national law. If you do not accept the terms, conditions and policies set out in this documentation, then you should not continue to use our website.

## Where we collect data about you.

In general, the personal data we collect is provided by you via email, through our Websites, social media networks.

Occasionally, when we are in the process of recruiting, we may collect data about you from specialized online platforms (eJobs, LinkedIn, etc.) or from CVs you send us.

Also, when you interact with us on social media (i.e. like, share, comment, review, etc.), we will inevitably have access to information about you, especially data that you have made public on your social media profile.

## How we use personal data

Please find below, the purposes for which we process your personal data, who has access to your data and how we store it.

### 1. We process data about you when you interact with us using the contact details available on our website or our social media accounts

When you interact with us using the contact details available on [bloomcoding.com](https://bloomcoding.com) or interact with us via social media messenger functions (e.g. feedback, referrals, requests for information, etc.), we will use your contact details and the data you provide to provide you with information and offers regarding our services, to address the situation you have raised, to assess the satisfaction of our customers and to continually improve our services.

<b>Personal data</b>	Your name, first name, phone number, email address, Internet Protocol (IP), cookie ID, data you have made public on your social media profile and any other data you voluntarily submit to us.
<b>Lawfulness of processing</b>	<ul style="list-style-type: none"><li>• We process your data in order to take steps at your request prior to the conclusion of a contract (Art. 6/1/b of Regulation (EU) 2016/679).</li><li>• In pursuit of our legitimate interest to respond to any questions, complaints or recommendations you send us and to improve our services and the experience we provide to our customers (Art. 6/1/f of Regulation (EU) 2016/679).</li></ul>
<b>With whom we can share your data.</b>	<ul style="list-style-type: none"><li>• Providers of IT services for our company (hosting and cloud data storage) or providers to whom we outsource certain technical support services for our website, cyber security monitoring and intrusion detection, or providers of customer relationship management systems;</li><li>• Social media platforms: <b>Facebook; Instagram, LinkedIn</b></li><li>• Regulators and other state authorities if required by legal or statutory requirements.</li></ul>

	<i>We will disclose your personal data only to the extent strictly necessary to achieve the intended purpose. We have taken all necessary steps to ensure that external service providers who have access to your data have implemented physical, electronic and managerial security measures to protect your data.</i>
<b>How long will we store the data</b>	We will store your data in our communications database for a maximum of 12 months after your last interaction. Data submitted via social media networks will be stored by them according to their own policies.
<b>Where the data is stored</b>	<ul style="list-style-type: none"> <li>• The data recorded via bloomcoding.com will be stored on the hosting provider's servers;</li> <li>• Data submitted via social media networks will be stored by them according to their own policies;</li> <li>• The data we download locally will be stored on our secure, local and cloud servers.</li> </ul>

## 2. We process data about you when you react to content on social media

You can find us on **Facebook, Instagram, LinkedIn**. Whenever you interact with us through our social media accounts (e.g. comments, likes, reviews, shares, etc.) we will have access to your publicly available data on your profile.

<b>Personal data</b>	Your name, photo, any publicly accessible information from your social media profile, or voluntarily communicated by you.
<b>Lawfulness of processing</b>	<ul style="list-style-type: none"> <li>• We process your personal data in order to respond to your request before entering into a contract (Art. 6/1/b of Regulation (EU) 2016/679),</li> <li>• Pursuing our legitimate interest (Art. 6/1/f of Regulation (EU) 2016/679) to respond to any questions, suggestions or complaints you may submit and to improve our services and the experience we offer our customers, and furthermore, pursuing our legitimate interest to keep you informed of news that the company publishes that may be of interest to you.</li> </ul>
<b>With whom we can share your data.</b>	<ul style="list-style-type: none"> <li>• Suppliers of IT services to our company, suppliers to whom we outsource certain technical support services for our website or suppliers of customer relationship management systems;</li> <li>• Social media platforms: <b>Facebook; Instagram, LinkedIn</b></li> <li>• Regulators and other state authorities if required by legal or statutory requirements.</li> </ul> <p><i>We will disclose your personal data only to the extent strictly necessary to achieve the intended purpose. We have taken all necessary steps to ensure that external service providers who have access to your data have implemented physical, electronic and managerial security measures to protect your data.</i></p>
<b>How long will we store the data</b>	Data shared with social media platforms will be stored by them according to their own policies.
<b>Where the data is stored</b>	<ul style="list-style-type: none"> <li>• Data shared with social media platforms will be stored by them according to their own policies, located in the European Union or the US.</li> <li>• The data we download locally will be stored on our secure, local and cloud servers.</li> </ul>

### 3. We process your data to make your browsing experience on bloomcoding.com easy and enjoyable

When you visit our website, we collect data about you through online identifiers (cookies and IP), which are stored in log files.

We use this information to help us design our website to better suit the needs of our users. We may also use your address. IP address to help diagnose possible malfunctions of our servers and to manage our website, maintain the security of our website and prevent fraud, authorize the use of services available on our website, analyze trends, track visitors' movements, and collect broad demographic information to help identify visitor preferences.

You can find more information about cookies, as well as how you can delete cookies and disable tracking by visiting the **Cookie Policy** available on our website.

<b>Personal data</b>	Internet Protocol (IP), general computer location, device (country level), website viewing history, timestamp, request/action, browser and operating system type and version; Other information that is generated as you use our website, including when, how often and under what circumstances you use it.
<b>Lawfulness of processing</b>	<ul style="list-style-type: none"><li>• We use cookies to make your navigation on our website easy and pleasant, in our legitimate interest (Art. 6/1/f of Regulation (EU) 2016/679);</li><li>• Non-essential cookies are not used without your consent (Art. 6/1/a of Regulation (EU) 2016/679).</li></ul>
<b>With whom we can share your data.</b>	<ul style="list-style-type: none"><li>• IT service providers for our company or providers to whom we outsource certain technical support services for our website</li><li>• Third parties placing cookies</li><li>• Regulatory and other state authorities, if required by legal or statutory requirements</li></ul> <p><i>We will disclose your personal data only to the extent strictly necessary to achieve the intended purpose. We have taken all necessary steps to ensure that external service providers who have access to your data have implemented physical, electronic and managerial security measures to protect your data.</i></p>
<b>How long will we store the data</b>	There are session cookies and persistent cookies. While session cookies are deleted when you close your browser, persistent cookies may have a different lifetime depending on the purpose they serve. More information about the duration of the cookies we use can be found in our <b>Cookie Policy</b> .
<b>Where the data is stored</b>	<ul style="list-style-type: none"><li>• The data collected through our own cookies will be stored on the servers of the hosting provider - amplica.md</li><li>• The data collected through third party cookies will be stored on their servers located in the European Union or in the USA.</li></ul>

### 4. Closing contracts and executing customer requests (as well as requesting a free trial lesson and for the delivery of gifts/awards)

In particular, we process the personal data contained in the documents you send us and the information necessary for the conclusion and performance of contracts.

<b>Personal data</b>	Guardian/parent: Last name, first name, email address, mobile phone, billing and delivery details, financial information collected at time of payment, IBAN account; for legal entities: company representative contact details.  Child: Name, first name, age.
<b>Lawfulness of processing</b>	We process your data for the conclusion and performance of a contract (Art. 6/1/b of EU Regulation 2016/679). We process the minor's data based on the consent of the holder of parental responsibility (Art. 8 of the EU Regulation 2016/679).
<b>With whom we can share your data.</b>	<ul style="list-style-type: none"> <li>IT service providers for our company or vendors to whom we outsource certain technical support services for our website, security monitoring and intrusion detection or customer relationship management system providers</li> <li>Hosting and cloud service provider</li> <li>The banking service provider in case of direct bank transfer payments</li> <li>Tax Reporting: National Tax Agencies</li> <li>Courier companies: ideas3D</li> <li>Online payment processor: Stripe</li> <li>Regulatory and other state authorities, if required by legal or statutory requirements.</li> </ul> <p><i>We will disclose your personal data only to the extent strictly necessary to achieve the intended purpose. We have taken all necessary steps to ensure that external service providers who have access to your data have implemented physical, electronic and managerial security measures to protect your data.</i></p>
<b>How long will we store the data</b>	<p>We will not retain personal data older than 5 years, calculated from the time of termination of the contract, except for documents subject to retention conditions imposed by national law (e.g. financial-accounting data).</p> <p>The data entered in the financial-accounting documents (e.g. invoices, card payments, reimbursement payments, bank transfers, etc.) will be kept in the archives for 10 years, starting from the end of the financial year in which they were drawn up, in accordance with the periods of the Accounting Law no. 82/1991 and Order 2634/2015.</p>
<b>Where the data is stored</b>	<ul style="list-style-type: none"> <li>The data recorded in our data management system will be stored on the hosting provider's servers located in the European Union.</li> <li>The data we download locally will be stored on our secure, local and cloud servers.</li> <li>In the case of parcels delivered via courier companies/postal services, the delivery data, which will be stored in their electronic systems and will be subject to the retention periods set by them.</li> <li>We will store your financial and accounting data on our secure local and cloud servers or in a physical archive.</li> </ul>

## 5. We process your data when you apply for a job at bloomcoding.com (as a Mentor)

Occasionally, we may be in the process of recruiting for our company, which is why you may be able to send us your details directly from our website.

<b>Personal data</b>	Name, surname, city of residence, e-mail address, telephone number, CV
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<b>Lawfulness of processing</b>	<ul style="list-style-type: none"> <li>We process your data in order to respond to your request before entering into a contract (Art. 6/1/b of Regulation (EU) 2016/679)</li> <li>Following our legitimate interest in responding to any questions or requests you send us in order to assess your application and choose the most suitable candidate for the job (Art. 6/1/f of Regulation (EU) 2016/679)</li> </ul>
<b>With whom we can share your data.</b>	<ul style="list-style-type: none"> <li>Suppliers of IT services to our company, suppliers to whom we outsource certain technical support services for our website or suppliers of customer relationship management systems</li> <li>Regulators and other state authorities if required by legal or statutory requirements.</li> </ul> <p><i>We will disclose your personal data only to the extent strictly necessary to achieve the intended purpose. We have taken all necessary steps to ensure that external service providers who have access to your data have implemented physical, electronic and managerial security measures to protect your data.</i></p>
<b>How long will we store the data</b>	<ul style="list-style-type: none"> <li>We will store your data in our communications database for a maximum of 12 months after your last interaction.</li> <li>Data shared with other platforms will be stored by them according to their own policies.</li> </ul>
<b>Where the data is stored</b>	<ul style="list-style-type: none"> <li>The data recorded through our website will be stored on the servers of the hosting provider;</li> <li>The data we download locally will be stored on our secure, local and cloud servers;</li> <li>Data shared with other platforms will be stored by them according to their own policies, in the European Union and the US.</li> </ul>

## 6. We process data about you when you send us a data access request

In order to exercise your legal rights under the GDPR, we must first identify you and process your data.

<b>Personal data</b>	Name, surname, e-mail address, telephone number, address, date of birth, relationship to the data subject if the application is completed on behalf of another person, other information you voluntarily send us.
<b>Lawfulness of processing</b>	<ul style="list-style-type: none"> <li>We process your data to comply with our legal obligations under the GDPR (Art. 6/1/c of Regulation (EU) 2016/679)</li> </ul>
<b>With whom we can share your data.</b>	<ul style="list-style-type: none"> <li>Suppliers of IT services to our company, suppliers to whom we outsource certain technical support services for our website or suppliers of customer relationship management systems;</li> <li>Regulatory and other state authorities, if required by legal or statutory requirements.</li> </ul> <p><i>We will disclose your personal data only to the extent strictly necessary to achieve the intended purpose. We have taken all necessary steps to ensure that external service providers who have access to your data have implemented physical, electronic and managerial security measures to protect your data.</i></p>
<b>How long will we store the data</b>	We will store your data in our communications database for a maximum of 12 months after your last interaction.
<b>Where the data is stored</b>	<ul style="list-style-type: none"> <li>The data recorded via <b>bloomcoding.com</b> will be stored on the hosting provider's servers.</li> <li>The data we download locally will be stored on our secure, local and cloud servers.</li> </ul>

## 7. We process your data for commercial and marketing communications, as well as for communicating the Bloomcoding presentation

We may send you information about the services we offer if you have requested this information (e.g. by subscribing to our newsletter) or if you are already our customer and this information may be of particular interest to you.

Personal data	Name, first name, e-mail address, phone number
Lawfulness of processing	<ul style="list-style-type: none"> <li>• We process your data in order to take steps at the request of the data subject prior to the conclusion of a contract (Art. 6/1/b of Regulation (EU) 2016/679)</li> <li>• We process data based on your consent (Art. 6/1/a of Regulation (EU) 2016/679), for marketing communications</li> <li>• We will process data in legitimate interest if you are already our customer and we consider that the information could be of great interest to you (Art. 6/1/f of Regulation (EU) 2016/679).</li> </ul>
With whom we can share your data.	<ul style="list-style-type: none"> <li>• IT service providers for our company, or vendors to whom we outsource certain technical support services for our website, cyber security monitoring and intrusion detection, or customer relationship management system vendors</li> <li>• Newsletter service provider - Mailerlite</li> <li>• Regulators and other state authorities if required by legal or statutory requirements.</li> </ul> <p><i>We will disclose your personal data only to the extent strictly necessary to achieve the intended purpose. We have taken all necessary steps to ensure that external service providers who have access to your data have implemented physical, electronic and managerial security measures to protect your data.</i></p>
How long will we store the data	<ul style="list-style-type: none"> <li>• If you subscribe to the newsletter, data processing will continue until you unsubscribe.</li> <li>• In the case of processing carried out in the legitimate interest, when you are already our customer, we will process your data for the duration of the execution of the contract and will continue to do so for a further 3 years after the termination of the contract.</li> </ul>
Where the data is stored	<ul style="list-style-type: none"> <li>• The data recorded via <b>bloomcoding.com</b> will be stored on the hosting provider's servers.</li> <li>• The data processed through the newsletter service provider will be stored on its servers.</li> <li>• The data we download locally will be stored on our secure, local and cloud servers.</li> </ul>

### Important:

If you wish to stop receiving newsletters or informative material from **bloomcoding.com**, all you have to do is press the "Unsubscribe" button available in the email you receive.

## 8. We process the data of the participants of the online programming lessons

<b>Personal data</b>	The image, the voice
<b>Lawfulness of processing</b>	<ul style="list-style-type: none"> <li>We process the minor's data on the basis of the consent of the holder of parental responsibility (Art. 8 of Regulation EU 2016/679).</li> </ul>
<b>With whom we can share your data.</b>	<ul style="list-style-type: none"> <li>Online platform service providers for conducting, recording and storing lessons</li> <li>IT service providers for our company, or vendors to whom we outsource certain technical support services for our website, cyber security monitoring and intrusion detection, or customer relationship management system vendors</li> </ul>
<b>How long will we store the data</b>	<ul style="list-style-type: none"> <li>We will store your data in our communications database for the duration of your consent.</li> <li>Data shared with other platforms will be stored by them according to their own policies.</li> </ul>
<b>Where the data is stored</b>	<ul style="list-style-type: none"> <li>The data recorded via the online platform will be stored on the servers of the online platform provider.</li> <li>The data we download locally will be stored on our secure, local and cloud servers.</li> </ul>

**9. We process the data of the participants of the online programming lessons in order to promote the company (e.g. by displaying images of the lessons on the bloomcoding.com website)**

<b>Personal data</b>	Image (photo-video) of the minor, projects made by the minor which may contain personal data, name and surname of the parent
<b>Lawfulness of processing</b>	<ul style="list-style-type: none"> <li>We process the minor's data based on the consent of the holder of parental responsibility (Art. 8 of the EU Regulation 2016/679). We process the data of the parent on the basis of their consent.</li> </ul>
<b>With whom we can share your data.</b>	<ul style="list-style-type: none"> <li>Users of bloomcoding.com</li> <li>IT service providers for our company, or vendors to whom we outsource certain technical support services for our website, cyber security monitoring and intrusion detection, or customer relationship management system vendors</li> </ul>
<b>How long will we store the data</b>	<ul style="list-style-type: none"> <li>We will store your data in our communications database for the duration of your consent.</li> <li>Data shared with other platforms will be stored by them according to their own policies.</li> </ul>
<b>Where the data is stored</b>	<ul style="list-style-type: none"> <li>The data will be stored on the hosting provider's servers.</li> <li>The data we download locally will be stored on our secure, local and cloud servers.</li> </ul>



## Is the data collected and processed by bloomcoding.com secure?

**Bloomcoding.com** pays close attention to the protection of your data and applies appropriate technical and organisational measures to ensure the protection of personal data processed, appropriate to the risks and categories of data protected, in particular, protects data against sharing it with unauthorised persons, its collection by an unauthorised person, its processing in violation of applicable laws as well as against data change, loss, damage or destruction.

However, remember that unfortunately no data transmission is guaranteed to be 100% secure.

**If you suspect a breach of your privacy, please contact us immediately at [privacy@bloomcoding.com](mailto:privacy@bloomcoding.com)**

**Important:** After the end of the data retention period, your data will be deleted. If we consider that this data could help us to improve the quality of our services, we will continue to use this data only after the irreversible anonymisation of this data.

## Links to other websites

**Bloomcoding.com** may contain links to other websites that are not owned or controlled by the **company**.

Please note that we are not responsible for the privacy practices of other websites or third parties. We encourage you to be aware when you leave our site and to read the privacy policies of each website that may collect personal information.

## Data processing of minors

For the purpose of providing the services offered by **Bloomcoding.com**, we will process the personal data of minors (under the age of 16). According to the GDPR, the processing of this data can only be carried out with the consent of the guardians/parents.

- In order to obtain a free demo lesson or to purchase a subscription, **Bloomcoding.com** collects from the minor's parent/guardian the first name, last name, age and name of the school where the minor is enrolled.
- During the online lessons, **Bloomcoding.com** will process the image, sound of the participants.

If we discover that a minor has used our website without the consent of the holder of parental responsibility, we will delete all personal data about them. In case of withdrawal of consent, Bloomcoding.com will be unable to provide the contracted services.

## International transfers of personal data

**Bloomcoding.com** shares personal data with partners operating outside the European Economic Area ("EEA").

List of international partners with whom we share data:

- Possible third parties that may place cookies: Google, Facebook
- Online platforms: Facebook, etc.
- Email marketing service provider: Mailerlite

- Online platform provider: Zoom Video Communications
- Etc.

Personal data may be stored and processed in any country where we engage service providers. We may transfer personal data we hold about you to recipients in countries other than the country in which the personal data was originally collected, including to the United States. These countries may have data protection rules that are different from those in your country. However, we will take steps to ensure that any such transfers comply with applicable data protection laws and that your personal data remains protected according to the standards described in this Privacy Policy. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may have the right to access your personal data.

Where applicable law requires us to ensure that an international data transfer is governed by a data transfer mechanism, we use one or more of the following mechanisms:

- **EU standard contractual clauses** with a data recipient outside the EEA or UK
- Verification that the recipient has implemented **binding corporate rules**
- We will also ensure that all our international partners have taken **additional measures** to provide adequate safeguards, enforceable rights and effective legal remedies. The role of these measures is to provide additional guarantees to data subjects that the transfer of data under standard contractual clauses or binding corporate rules provides a level of protection equivalent to that guaranteed within the European Union.

## The rights you enjoy

As a data subject you have specific legal rights with regard to your personal data that we collect and process. **Bloomcoding.com** respects your rights and ensures that your interests are properly taken into account.

- **Withdrawal of consent:** If the processing is carried out on the basis of your consent, you may withdraw your consent to the processing at any time.
- **Data rectification:** If you notice that we hold erroneous personal data, you can ask us at any time to rectify the personal data concerning you. We make reasonable efforts to keep personal data - which is used continuously and which is in our possession or control - accurate, complete, current and relevant, based on the most recent information available to us.
- **Restriction of processing:** If you are in one of the situations below, you can ask us to restrict the processing of your data:
  - challenge the accuracy of personal data for the period during which we need to verify the accuracy,
  - the processing is unlawful and you request restriction of the processing rather than deletion of the personal data,
  - we no longer need your personal data, but you request them for the establishment, exercise or defence of a right, or

- you object to the processing during the period in which we check whether our legitimate reasons take precedence over your rights.
- **Access to your data** You can ask us for information about the personal data we hold about you, including information about what categories of data, what it is used for, where we collected it from, whether it is collected directly from you, and to whom it was disclosed, if applicable. You can obtain a copy from us, free of charge, containing the personal data we hold about you. We reserve the right to charge a reasonable fee for abusive requests.
- **Right to portability:** Upon request, we will transfer personal data to another controller, where technically possible, provided that the processing is necessary for the performance of a contract. Rather than receiving a copy of your personal data, you can request that we transfer your data directly to another controller specified by you.
- **Right to erasure:** You can obtain the deletion of personal data from us if:
  - your data is no longer necessary for the purposes for which it was processed;
  - object to further processing of personal data (see Right to object below);
  - personal data have been unlawfully processed;
  - you withdraw your consent on the basis of which the processing takes place
 Unless processing is necessary:
  - in order to fulfil a legal obligation that requires us to process that data;
  - in particular for the legal requirements on data retention periods;
  - to establish, exercise or defend a right in court.
- **Right to object:** you can object to the processing of your personal data at any time due to your particular situation. In this case, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds and an overriding interest for the processing or for establishing, exercising or defending a right. When objecting to the processing, please mention whether you want to erase personal data or restrict the processing of such data.
- **Right to lodge a complaint:** In the event of an alleged breach of applicable privacy legislation, you may lodge a complaint with the Data Protection Supervisor:

### To remember!

**Timeframe:** We will try to resolve your request within 30 days. However, the period may be extended for reasons of specific legal right or complexity of the request.

**Restriction of access:** In certain situations, we may not be able to grant you access to all or part of your personal data due to restrictions provided by law. If we deny your access request, we will notify you of the reason for the denial.

**Unidentifiability:** In some cases, we may not be able to identify personal data due to the lack of identifiers provided in your request. In such cases, if you do not provide additional information that allows us to

identify you, we will not be able to fulfill your request to exercise your legal rights as described in this section.

### **Exercising your rights**

To exercise your legal rights, please contact us in writing at [privacy@bloomcoding.com](mailto:privacy@bloomcoding.com)