

Privacy Policy of Software University/SoftUni

This Privacy Policy outlines our internal practices with regards to processing of information that can be used to directly or indirectly identify a given person (“Personal Data”).

Our privacy policy (based on the GDPR regulation) is applicable for each EU citizen/resident. If you are not a European citizen, we will take into consideration all local laws and privacy policies in the country.

Introduction

Thank you for using the services of SoftUni! Your privacy and security are of great importance to us. We are focused on providing you with the best possible education without compromising on the information you share with us when studying with us. What we do for you from now on is referred to as the “services”. This Privacy Statement is designed to help you understand what information we collect, for what purposes, why we do it, and how you can manage the data you provide.

1. General information

Please ensure that you familiarise yourself with the overall content of this document, and in the following lines you can review the most basic and important items you should take into consideration:

As a general principle, your granting of any consent and your provision of any Personal Data is entirely voluntary. Your decision not to grant any consent or not to provide Personal Data will not lead to any undesirable consequences for you. However, there are circumstances in which SoftUni can not act without the availability of certain Personal Data. For example, SoftUni may need your Personal Data to process your orders and requests or to provide you with access to a web service or a newsletter. Unfortunately, in the above-mentioned cases, SoftUni will not be able to complete your request unless it receives the relevant Personal Data for this.

We collect your information to provide, improve, customise, and sell our training services.

To be able to give you access to our services, you have to create an account with us by entering a user name, email, and password. Your email is used to restore access, for customer and technical support, and for notifications.

With your consent, we can provide you with customised content such as advertisements or special options. Our services offer the option to opt out through your account settings or through the support system.

We use external analysis systems like Google Analytics to provide higher quality of our services and to improve our business.

In the event of material changes to this policy, we will notify you accordingly. By continuing to use our services after the changes are introduced, you agree to the new policy.

Links to other websites. This website may contain links to other sites. Software University/SoftUni is not responsible for the personal data protection practices or the content on websites outside of SoftUni's platforms. We strongly recommend that you read carefully the privacy statements of such web sites.

If you have any questions about this policy or the way we process your data or how to exercise your legal rights with respect to your data, you can always contact us at privacy@softuni.bg or through our feedback and contact form.

2. Information we collect

2.1 Information you provide us directly

Creating user accounts. SoftUni offers you the option to use all Web services and products, including forums, blogs and networks (as part of the SoftUni Community), related to this website and all platforms under the SoftUni brand. To access them, you need to sign up and create an user account. User accounts allow you to display your personal information to other users, including, but not limited to: Your name, photograph, age, gender, city, country, social media accounts, email address, phone number, education, personal interests, technical skills, professional experience. All the data described above is provided voluntarily by our users and can be rectified, erased and managed in an easy, accessible and efficient way.

However, in order to create your account and to provide our services to you, we need certain information that you directly provide us with. Depending on the service, this information may be:

2.1.1 Basic account information

When you use our services, you provide us with an email, user name and password. We record and process this information to create your account and provide you with the necessary access to SoftUni's services. Your email is used to restore access, and to provide customer service, technical support, and for sending information messages. Your user name may be displayed to other users as part of our services.

2.1.2 Account information when applying

In order to use our services, when you submit your application for the introductory courses in "Programming Basics", "Marketing Fundamentals" and "Design Fundamentals", we need the following information: full name, date of birth and place of birth. We collect this data to communicate with you and to improve the quality of the service during your training and for the purpose of statistical and demographic analysis.

In order to use our services, when you submit your application for open training, course or module, we need the following information: user name, full name, phone number and email address. We collect this data to communicate with you and to improve the quality of the service during your training and for the purpose of statistical and demographic analysis.

2.1.3 Transaction information

When you buy paid options in our services, we collect information about the purchase. As we do not collect the information directly, various policies may apply depending on the payment method. For more information, please refer to the specific payment method. The data is collected for legal purposes, tax regulations in various countries, or for providing technical support. It may be necessary to collect the following information: country, payer's address, mobile telephone number, transaction ID, and payment dates.

2.1.4 Information and content that you provide explicitly

We retain and process the information you provide explicitly in order to use our services. Such information may be: chat messages, forum posts, forum messages, comments, messages between users, profile pictures, avatars and the like.

2.1.5 Technical Support

You may provide us with additional information relative to the way we use our services, including screenshots, copies of messages, additional contact information so we can provide you with the necessary technical assistance.

2.2 Additional information we receive

By using our services, you also generate additional information that we collect and process:

2.2.1 Information for your account

In order to improve the service quality and according to your needs, you can also enter additional information related to your profile, such as name and family name or full name, country, location/city, date of birth, gender, telephone number, education, work experience, technical skills, interests and favourite technologies.

2.2.2 Cookies

Cookies are small data files stored on your device. We use cookies and similar technologies to provide our services. We use “session” cookies to identify you temporarily. They are a cookie type that is stored only during the active use of our services. After closing the application, closing your browser or mobile device, the data is deleted. We also use cookies to provide the “Remember me” option, which allows you to use our services without providing user name and password. Additionally, we may use cookies to store different small settings, such as language choices, menu items, and personalised content. Cookies can also be used to measure our marketing efforts. Finally, cookies can be used to investigate fraud and other prohibited activities. You can delete the stored cookies from the settings of your device. Keep in mind, however, that some of the options may not work properly.

2.2.3 “SendInBlue”

“SendInBlue” is an external tool we use to send information, analyse, optimise, and improve our services. With this external service, we measure our marketing performance, measure web traffic, and track if an email has been opened.

2.3 Information we collect from other sources

We may receive information from other sources that we can combine with information collected directly. For example, when you sign up for our services through your Facebook account and its Facebook Login option, we get access to your name, profile picture and email according to Facebook's rules. Other similar sources are Google Sign-In and Google +.

2.4 Analysis information

We use our own system as well as external ones to collect, aggregate and analyse data to improve productivity, marketing efforts, the stability and quality of our services. Our main external system is the above-mentioned service on the SendInBlue platform. All external systems adhere to and comply with data protection laws and best practices in the field.

3. Social media sharing options

Our services may provide options and tools that allow sharing information with social media, such as Facebook, LinkedIn, Twitter, Instagram. For example: Facebook Like button that allows you to share information from our services on the Facebook network. The use of such options and their ways of processing information depends on the particular social network.

4. How we use your information and processing purposes

We use your information to provide access to our services, to ensure their proper functioning; to deliver the highest quality we are capable of and to improve our marketing efforts and SoftUni's business model.

We collect your information for the following purposes:

- So that you can use all the training services SoftUni provides
- So that we can build better education
- To provide effective education to all our users
- To ensure honesty and fairness, and to prevent fraud
- To communicate with you
- To provide you with technical support
- To optimise our business
- To optimise our marketing activities
- To verify and confirm payments
- To provide the requested services and products
- To send you information related to the provided services
- To send you information about new and future services
- To provide you with social options
- To help you with your professional and career development
- To allow communication with other users of our services
- To monitor the use of our services and to analyse emerging trends
- With your consent, to provide personalised advertisements if the service allows it

4.1 News for SoftUni products and services

Observing the respective provision and with your consent, SoftUni may use your name, email or telephone number to provide you with up-to-date information on the latest product advertisements, packages, services, special offers, and other relevant information about SoftUni training. In connection with advertising activities, SoftUni can provide a hashed identifier for social networks or other web-based products managed by third parties (Twitter, LinkedIn, Facebook, Instagram or Google), with the information being compared with social media data or own databases of web products so that you can see more relevant information.

5. How do we share this information?

When you sign up, we create an account whose information may be accessible to other users of the service. The shared information can contain only your user name, picture/avatar, interests in programming, work experience, certificates, and other information of interest to you that you voluntarily decided to share.

5.1 Non-public information

We do not share the following information:

- Your name and family name and/or your full name
- Your email
- Age
- Sex
- City
- Telephone number
- Your password
- Information about your payments

5.2 Provision of external services with your consent

We may share information with external services with your explicit consent. For example, in order to display personalised advertisements, we will ask for your consent prior to their display. We can also share information and data provided by you in advance, with the aim of career development and future professional opportunities. All external services adhere to and are compatible with data

protection laws as well as with the best practices in the field.

5.3 Information we share to protect our services and comply with the law

We reserve the right to share your information when we reasonably believe that the law requires it from us when necessary for the detection, prevention and resolution of fraud, unauthorised use of our services, violation of our general terms of use or other harmful illegal actions, as well as to protect our users.

6. What is our legal basis for processing your information?

6.1 Providing requested services

If you make a request for one of our paid services, SoftUni will use the Personal Data you enter in the order or the registration form: Your name, email address, phone number, company name, and mailing address. If a payment is made – credit card number or bank details for the sole purpose of processing your order or providing the services ordered. In this Privacy Policy, “services” may include: web services, live streaming, products, content, non-promotional newsletters, technical documentation, training and events.

If you benefit from our trainings, SoftUni can also monitor your progress and academic performance in order to provide you with relevant and timely information directly related to the learning process. In addition, we communicate regularly with our subscribers who have subscribed to our services by email, as well as by telephone, in connection with customer complaints. We may use your email address or phone number to send you payment notification or information about changes to our products and services as well as to send you notifications or other information as required by law. In relation to advertising communication (i.e. emails and telephone calls), SoftUni will provide you with such information only with your permission as required by law and will allow you to exercise your right to refuse to receive such messages from us. You can opt out from receiving such messages at any time via your profile settings.

6.2 Legal grounds for processing personal data

We collect and process your information as described above on the following grounds:

- to fulfil our contractual obligations
- in accordance with your consent, which you can withdraw at any time through your profile settings or by contacting our technical support team
- to protect your vital interests and those of our other users
- to comply with our legal obligations
- when it is necessary for the purposes of our legitimate interests, including our interests to provide high quality, secure, customised and cost-effective service to our users, except in cases where your own interests take precedence over those interests or fundamental rights and freedoms that require the protection of personal data.

7. How can you exercise your rights?

To exercise your rights, you can always contact us at privacy@softuni.bg or through our feedback and contact options on any of SoftUni's platforms.

To manage your profile information, you can use the option provided in the service you are using.

You have the legal right to:

- edit, add, delete, and manage your account information at any time
- to unsubscribe from marketing emails
- to opt out of personalised advertisements where the service provides such advertisements
- opt out of career guidance and contact with our Career Guidance Centre
- to access the personal information, we hold about you in a convenient machine-readable format
- to correct your personal information wherever possible and not explicitly required so that we can provide you with access to our service
- to ask for your personal data to be deleted, as well as everything related to your account held by SoftUni
- to contact us for any questions, complaints, or other issues that may arise when processing your personal data.

We will respond to all inquiries related to the storage and processing of your personal data in a timely manner. If you have an unresolved request relating to your personal data, you can also contact your respective country authority in the European Union.

8. Retention period

We keep your data for as long as your account is active, or the data is needed to provide you with the required service.

We may retain your data for a longer period to comply with our legal obligations, legal requests, state inquiries or investigations into possible violations of our terms of service and to prevent any damage. To comply with tax regulations, your payment information is kept for at least 2 years.

9. How we keep and store your data

We follow the widely-accepted standards for storing and protecting personal data that we collect and do it wherever data is received and stored, using encryption where necessary. We retain personal data only for as long as necessary to provide the services you have requested and afterwards for a variety of legitimate legal or business purposes. If you have any questions regarding the security or retention of your personal data, you can contact us at privacy@softuni.bg

10. Use of our services by children

The mission of SoftUni has always been to provide high quality and accessible education in the IT and digital world, creating real professionals and future leaders. One of the main goals is to provide educational opportunities and an equal chance to all who want to study. For this reason, at SoftUni there are no age-related limits for access to our training services. However, and in accordance with the provisions of the *General Data Protection Regulation (Regulation (EU) 2016/679)*, you must still have the minimum age to consent to the processing of personal data. If you are under the age of 16 and want to use our services, please note that the processing of personal data is lawful only if and to the extent that such consent is given in writing or authorised by the holder of parental responsibility over the child.

11. External partnership services

SoftUni partners with many successful and fast-growing technology companies in the country. Our partners offer a wide range of opportunities and ways of development in every single IT sector field. For this reason, the Career Centre operates in direct communication with these partners and provides opportunities for professional development to its users. Upon your explicit consent, your submitted data is processed and shared with our partners for the purpose of your career development. All external services and partnerships adhere to and are compatible with data protection laws and the

best practices in the field.

When you take advantage of our career support service and the entire activity of the SoftUni Career Centre, we will advise you on how to make a professional resume for your successful job application. In order to provide you with better services and effective professional assistance, we can use the services of an external company (web portal) that provides digital CV creation. Our partners submit to and comply with data protection laws and the best practices in the field.

12. Changes to this policy

We can revise this policy if necessary. If we make any material changes, we will notify you immediately. By continuing to access and use our services after these changes take effect, you agree to the new privacy policy.

13. Contacts

For any questions regarding your personal data, we encourage you to use the provided feedback methods for the relevant service. This way, we will be able to respond faster and better to your inquiries.

Name of the Administrator	Software University EOOD
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