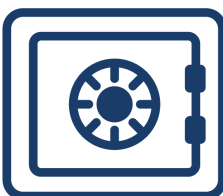




Privacy Statement Prowise



At Prowise, your privacy is our priority. This is rooted in our strong belief in the right to privacy, reflected in our core privacy values.

We Care	We Protect	We Do Not Share
		
We handle your personal data carefully and respectfully. Privacy is embedded from the start when we develop our products.	We offer safe and secure solutions that are certified by independent authorities.	We do not use data as a revenue model. We develop our products completely independently in-house.

Our privacy statement in brief

When processing personal data, we comply with applicable privacy legislation. This means that we:

- Clearly define our purposes before we process your personal data, via this privacy statement.
- Store as little personal data as possible and only process the personal data necessary for our purposes.
- Explicitly ask for consent for the processing of your personal data, where consent is required.
- Take the necessary security measures to protect your personal data. We also impose these obligations on parties that process personal data for us.
- Respect your rights, such as the right of access, rectification or erasure of your personal data processed by us.

Who is Prowise?

Prowise offers an integrated solution for optimal digital education in a secure learning environment and is active in various European countries.

Where this statement refers to “**we**”, “**us**” or “**our**”, it refers to Prowise B.V., located at Luchthavenweg 1B, 6021 PX in Budel, the Netherlands and the companies in the same group, such as the parent company and/or affiliated group companies.

Prowise B.V., registered with the Dutch Chamber of Commerce under number 52893766, located at Luchthavenweg 1B, 6021 PX Budel, the Netherlands.

General contact: info@prowise.com

Privacy contact: privacy@prowise.com

When and for whom does this privacy statement apply?

This privacy statement applies when Prowise acts as a data controller under applicable privacy legislation in relation to the processing of your personal data.

This is the case:

- if you visit our websites, our offices or our events
- if you are a customer or supplier
- if you wish to use our products personally and register via our website
- if you ask us a question or contact us

We distinguish between the following categories of data subjects:

- (Website) visitors
- Customers
- Suppliers
- Minors*

*In the educational context, the school is usually the data controller for student data and Prowise acts as a processor. This is set out in our data processing agreement. We process student data exclusively according to the school's instructions and with appropriate security measures.

This privacy statement does not apply when you are considering applying for a job at Prowise. We then refer you to the Privacy Statement for Applicants.

Purposes of data processing

In this privacy statement we explain what we do with the information we obtain about you. By using our services or by visiting our website www.prowise.com and careers.prowise.com, we obtain various types of personal data from you. Below, we explain which personal data we obtain from you, for what purpose we process this personal data and how long we retain it. If you have questions or want to

know exactly what data we process, please contact us via the contact details at the bottom of the privacy statement.

Providing our services

For this purpose, we process the following personal data:

- Contact person's name
- (business) telephone number
- (business) e-mail address
- Organisation, school or school board name (optional)
- Payment details
- Invoice details
- Any content of correspondence/documentation.

Prowise processes this personal data where necessary for the performance of the agreement with your organisation and, where applicable, on the basis of its legitimate interest in maintaining the resulting business relationship. The personal data is retained for up to 2 years after the end of the agreement. In the event we do not enter into an agreement, we retain this personal data for up to 2 years after the end of the quotation process. Personal data may also be retained for longer when we are obliged to do so (for example because of the statutory tax retention period of seven years).

Prowise Cloud Platform (includes Prowise Presenter and Prowise GO)

The Prowise Cloud Platform enables the management of Prowise cloud services (such as Screen Control, account.prowise.com and Presenter), including SSO with various services (Basispoort, SURFconext, Google, Microsoft, Apple and any other third parties using a unique identification key).

For this purpose, we process the following personal data:

Service	Categories of personal data
Account Portal (creating a Prowise Account)	• General and contact details (such as name and e-mail address) • Login credentials (such as username and password) • Identification details (administration number, such as an education participant number, when you are a Professional User) • Organisation data (data relating to your organisation, such as organisation name, group, class and role)

	• User settings and actions (such as country/language setting, account registration and deletion date, number of logins, number of incorrect password attempts) • Log files – technical data (such as type and version of the browser used and IP address) Legal basis: necessary for the performance of the agreement.
Reflect (the app can be used on your device in combination with Prowise Touchscreen)	• Log files – technical data ◦ Device information (model, operating system, type, version and serial number) ◦ Type and version of the browser used ◦ IP address ◦ Connectivity data (to establish a connection between devices for screen casting) • User settings (country/language setting on your device) Legal basis: necessary for the performance of the agreement.
Presenter	• Account information (from Account Portal) • User data ◦ User files (text and visual material, with or without audio) ◦ ProConnect user files (polls, quizzes and mind maps) • General and contact details and organisation details (when placing and sharing files or data in the Presenter Community) Legal basis: necessary for the performance of the agreement.
ProConnect (use in combination with Presenter)	• Log files – technical data ◦ Device information (model, operating system, type, version and serial number) ◦ Type and version of the browser used ◦ IP address ◦ Connectivity data (to connect between devices so that an educational quiz or game can be created and played) • User settings (country/language setting on your device) Legal basis: necessary for the performance of the agreement.
GO	A service available to schools in the Netherlands, consisting of an online learning environment with full IT management and support. This service can only be used by Professional Users and uses services within our Cloud Platform (such as Presenter and Learn). Legal basis: necessary for the performance of the agreement.

Prowise Screen Control and Central

With Prowise Screen Control you can manage all your touchscreens from a central location. At the push of a button, you can install apps, push updates or change the background image of all screens

in your school or foundation. You can also manage Windows devices supplied by Prowise and you can set policies to restrict device use.

Prowise Central is the operating system on Prowise touchscreens. It starts up immediately, contains all teaching and management tools (e.g. whiteboard, browser, screen sharing, App Store) and is fully developed for the Prowise hardware with a focus on privacy and security.

For this we process the following personal data:

Service	Data
Log files – technical data	• Device information (model, type, software version, serial number, screen name (optional, user-defined), Central devices (Prowise Touchscreens)) • Type and version of the browser used • IP address Legal basis: necessary for the performance of the agreement.
User settings and actions	• language, display, audio and localisation settings of the online Prowise Screen Control Dashboard • Session and login data (when a device last connected to Screen Control) • Roles assigned to a user of the online Prowise Screen Control Dashboard with corresponding permissions (this can be at organisation, group or device level) • Groups created by the user within Screen Control including optional description • Settings and configurations that are centrally installed or adjusted from Screen Control for the registered devices in your environment, such as: ○ General settings (maximum volume, screen brightness and contrast) ○ System updates ○ Security settings ○ Theme, including screen background ○ Connectivity settings (NFC) ○ Screencasting (streaming protocols and security) ○ Central apps ○ Power management, including scheduled power on/off Legal basis: necessary for the performance of the agreement.
Diagnostic and usage data	Data and statistics that are displayed in the online Prowise Screen Control Dashboard and are generated based on the data listed above, such as: • Number of registered devices per organisation and per group • Configured/created groups within the organisation • Access management data used to manage access to the online Prowise Screen Control Dashboard

	Legal basis: necessary for the performance of the agreement.
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Contact

We offer various ways to contact us. You can contact us by telephone, by e-mail or via the contact form.

For this purpose, we process the following data:

Service	Categories of personal data
Support provider contact forms	- General and contact details (such as name and e-mail address) - Identification data (administration number, such as an education-participant number, when you are a Professional User) - Organisation data (data relating to your organisation, such as organisation name, group, class and role) Legal basis: necessary for the performance of the agreement.

Applying for a job at Prowise

For this, please refer to our "Privacy Statement for Applicants".

Customer satisfaction survey

Service	Categories of personal data
Customer satisfaction surveys	- First name(s) - Last name - Job title - Organisation, school or school board

	• email address • telephone number • Survey responses Legal basis: legitimate interest in improving our services.
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Who has access to your personal data?

Your personal data can be exchanged between the companies within the Prowise group of companies, currently consisting of Prowise B.V., Prowise R&D B.V., Oefenweb.nl B.V., Prowise GmbH, Prowise Belgium B.V.

We only share your personal data with third parties when this is required or permitted by law. Where necessary, we enter into an agreement that includes confidentiality and security obligations.

This includes, among others, the following parties:

- Hosting and mail providers
- Support providers
- IT and Security Service providers
- Financial service providers
- Analytics providers and cookie providers (see cookie statement)
- Logistics service providers
- Consultants
- Public authorities

In other cases, we only share your data after you have given prior consent. We never sell your data to third parties.

Safeguards for international data transfers

We do our best to keep your data in the European Economic Area (EEA). In some cases, service providers outside the EEA offer a higher level of service, particularly in terms of security. In such cases, we choose quality.

Transfers outside the EEA only take place on the basis of an adequacy decision, appropriate safeguards such as Standard Contractual Clauses (SCCs), or the EU-U.S. Data Privacy Framework. An overview of processors and sub-processors is available upon request via privacy@prowise.com.

Summary of purposes by target group

Target group	Purpose	Data	Legal basis	Recipients	Retention period
Website visitor	Statistics and improvement	IP address, device ID, usage data	Consent or legitimate interest	Analytics providers and cookie providers	1 year
(potential) customer	Account creation/management	Name, e-mail, organisation, log data	Performance of the agreement	Hosting and mail providers IT and Security Service providers	2 years (after active login)
Customer	Billing and administration	Name, address, payment and invoice details	Legal obligation	Hosting and mail providers Financial service providers	7 years
Customer/end user	Support	Name, contact, support ticket content, log files	Legitimate interest	Support providers	35 months after the support request has been resolved
Prospect/customer	Newsletter/updates	Name, e-mail, preferences	Consent	Hosting and mail providers	Until consent is withdrawn or after 2 years of inactivity
Customer	Customer satisfaction survey	Contact details, feedback	Legitimate interest	Hosting and mail providers	2 years

Security

We protect our website and other systems through technical and organisational measures. We do this to prevent data from being lost or unauthorised persons from gaining access to it.

Examples of some technical measures we have taken:

- data is transmitted via a secure connection when one of the forms on our website is used
- data is encrypted during transmission
- we have implemented various security measures that protect against internal and external attacks.

Some examples of organisational measures taken by us:

- Internal policies have been drawn up and implemented.
- Our employees only have access to personal data insofar as this is necessary to perform their duties.
- We periodically review our security measures, for example by conducting internal vulnerability assessments and assessing best practices (for example OWASP and the guidelines of the NCSC) relating to security.

In addition, we hold relevant certifications and both internal and external audits take place on a regular basis. We take immediate action if these audits show that this is necessary or desirable. Despite the measures taken and regular checks, complete protection against all risks is unfortunately not possible, but we do everything we can to maintain our security in accordance with applicable standards.

Your privacy rights as a data subject

Under the GDPR, you have the right to exercise the following privacy rights:

- right of access (art. 15 GDPR)
- right to rectification (art. 16 GDPR)
- right to erasure (art. 17 GDPR)
- right to restriction of processing (art. 18 GDPR)
- right to data portability (art. 20 GDPR)

To exercise these rights, you can contact us via privacy@prowise.com. Please keep in mind that with such requests we must check whether you are actually the data subject concerned.

You also have the right to lodge a complaint about the way in which we handle your personal data. When you have a complaint, we would prefer to resolve it with you directly. Please contact us in that case. If you are not satisfied with the handling of your request or complaint, you have the right to lodge a complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens, AP). Please refer to the [AP's website](#).

We do not use automated decision-making via our website.

We strive to provide a response on the merits to your GDPR request within one month. In exceptional cases, when a request is complex or multiple requests are submitted at the same time, this period can be extended in accordance with legal provisions. In that case, we will inform you in a timely manner.

Right to object

In addition to the rights mentioned above, you can also object to certain processing activities.

Right to object (art. 21 GDPR)

Where we process personal data on the basis of our legitimate interests or those of a third party, you have the right to object to this. You may object on grounds relating to your particular situation.

You can object via the contact details mentioned in this privacy statement.

Version and changes

Changes in legislation, changes to our internal processes or other new developments may make it necessary or desirable to amend this privacy statement. We recommend that you consult this statement regularly so that you remain aware of any changes.

Contact:

Prowise B.V.

Luchthavenweg 1B

6021 PX Budel

T: 0495 497110

E: privacy@prowise.com

Version: June 2026