

MoovKids Privacy Policy

Last revised on 07 September 2020

We ask that you read this Privacy Policy carefully as it contains important details about what personal data Moovkids Oy ("MoovKids") collects and processes when you use our services, including the choices we offer you to access, maintain and control them.

1. Your Moovkids Account and Service Data

1.1. When you register for and use our services, we will collect and process your personal data, supplied by you, in order to be able to provide our services to you. Below is a table to inform you clearly of:

1. What personal data we collect on registration;
2. The purposes for processing;
3. The lawful basis for processing;

Data Collected	Purpose for Processing	Lawful Basis of Processing
Email address	<ul style="list-style-type: none">• To manage registration, perform account management and provide customer services• To identify you within our services and service usage• Administrative (i.e. financial, legal and regulatory compliance)• To contact you about products, events, services, prizes, gifts and free giveaways• Security	Contractual obligation, legal obligation, consent and legitimate interest
Username	<ul style="list-style-type: none">• To manage registration, perform account management and provide customer services• To identify you within our services and service usage• Administrative (i.e. financial, legal and regulatory compliance)• Security	Contractual obligation, legal obligation and legitimate interest
Password	<ul style="list-style-type: none">• Security	Contractual obligation, legal obligation and legitimate interest
Country	<ul style="list-style-type: none">• To manage registration, perform account management and provide customer services• Administrative (i.e. financial, legal and regulatory compliance)• To provide service personalization and service improvement	Contractual obligation, legal obligation and legitimate interest
Occupation	<ul style="list-style-type: none">• To provide service personalization and service improvement	Legitimate interest

1.2. Where legitimate interest is the lawful basis of processing your personal data, the legitimate interests we are pursuing are as follows:

- Providing you any products or services you have requested;
- Analyzing your use and measuring the effectiveness of our services to better understand how they are being used so we can improve them and engage and retain users;
- Sending you information about our products, events and services, special offers and similar information (where your consent is not required);
- Analyzing your use of our services and interaction with our communications, to tailor and customize our services and marketing communications;
- Diagnosing problems in our services;
- Conducting surveys and market research about our customers, their interests, the effectiveness of our marketing campaigns, and customer satisfaction (unless we need consent to undertake such surveys, in which case we will only do this with your permission);
- Investigating and responding to any comments or complaints that you may send us;
- In connection with legal claims, compliance, regulatory and investigative purposes as necessary (including disclosure of information in connection with legal process or litigation).

1.4. Where contractual and legal obligations are the lawful basis of processing your personal data, the consequence of failing to provide your personal data will be that we are unable to provide our service to you.

1.5. We may process information relating to you where this has been provided by an employer. To illustrate, your employer may have provided us with your work contact details so that we can communicate with you and set up your school account. In each case, we will provide you with the appropriate details from where we obtained your personal data in accordance with data protection laws.

2. Your Moovkids Service Usage Data

2.1. When you interact and make use of our services, we may capture and process usage data. This data is ultimately processed with the purpose of delivering reliable, secure and accurate services and to consistently enhance, improve and optimize your experience of using our services. We do not sell this data to third parties. Our legal basis for this processing is that of legitimate interest. Examples include: IP address; browser type and version; operating system used; website speed, website navigation paths and actions; and patterns of service use.

3. Sharing Your Personal Data

3.1. We will disclose your personal data to our employees to enable them to process your data.

3.2. Your personal data may also be disclosed to other companies working with Moovkids, such as agents, sub-contractors, data processors and suppliers (3rd parties) to enable them to process your personal data on our behalf.

3.2. When we supply any of your personal data to our agents, sub-contractors, data processors and suppliers (3rd parties), we protect your personal data by ensuring reasonable contractual arrangements are in place that stipulate compliance with this Privacy Policy.

4. Marketing and Product Preferences

4.1. We may use account, service and usage data to provide you with information about our products and services. Our purpose is to provide you with a service to help meet your needs. Our lawful basis for processing this data is consent. You are free to withdraw your consent at any time.

4.2. You may change your preferences or opt-out at any time by either accessing 'Your Contact Preferences' within your Moovkids account or by unsubscribing from Moovkids marketing emails by using the 'unsubscribe' link at the end of the email received. Please note that as a Moovkids user or subscriber you are unable to unsubscribe from customer service emails (such as service updates) as these are required to provide our service to you and the lawful basis of processing is contractual or legitimate interests depending on the circumstances.

5. Our Use of Cookies and Stored Device Data

5.1. A cookie is a small text file that is downloaded onto a computer or smartphone when the user accesses a website. It allows the website to store and retrieve information about how the device is using the website.

5.2. The Moovkids website uses cookies and stored device data for the following purposes:

- to ensure the correct technical functionality of the services we provide and optimize global performance, for example, to help you find the most relevant content and get that content to you quickly and accurately;
- to maintain website security, prevent website abuse and ensure legislative/regulatory compliance - for example, to prevent cyber-attacks;
- to compile, and enrich, internal business data regarding website traffic and activity - for example, to help us to understand our most popular website pages, visit sources and time-of-day traffic;
- to help to improve our services to you and better meet your future needs - for example, to understand your needs and preferences so as to improve your website experience.

5.3. If at any point you wish to withdraw consent for the use of cookies you can clear these from your browser by clearing your website history and configure your browser to block cookies. Some of our website features may not function correctly and/or you may not receive the best website experience if you disable/do not consent to the use of cookies.

6. How We Protect Your Personal Data

6.1. We have put in place a number of security procedures and technical organizational measures to safeguard your personal data. These measures are reviewed regularly and updated when necessary in order for us to meet business needs and in accordance with changes in technology and regulatory requirements.

Examples of procedures and technical and organizational measures:

- We train and take steps to ensure our employees operate in accordance with our information security policies, procedures and applicable contractual conditions.
- We have measures in place to protect against accidental loss and unauthorized access, use, destruction or disclosure of data. Some examples are: staff screening, encryption and hashing; firewalling and content filtering; virus/malware scanning and protection; vulnerability scanning; multi-factor authentication; pseudonymization; logging, monitoring, inventory and auditing; secure design; privacy impact assessments, physical security controls; system authentication/role-based access control, high availability configuration and regular backups.
- We have a business continuity and disaster recovery strategy that is designed to safeguard the continuity of Moovkids's service and to protect you and your data.

6.2. We will use all reasonable efforts to safeguard your personal data. However, you should be aware that the use of the Internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data that is transferred from you or to you via the Internet.

7. Overseas Transfers

7.1. The personal data you provide may be transferred to countries outside the European Economic Area ('EEA') that do not have similar protections in place regarding your data and restrictions on its use as set out in this Privacy Policy. However, transfers outside of the EEA will be protected by us imposing appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission to ensure the security of your data or via, independent privacy schemes approved by regulators.

7.2. The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein. By submitting your data, you consent to these transfers for the purposes specified above.

8. Your Rights Under Applicable Data Protection Law

8.1. Your rights in respect to how we process your personal data are set out in the table below. Please note that some of these rights only apply in certain circumstances.

8.2. We respect and value your right to access and control your data and want you to feel confident that we are handling your personal data responsibly and in line with good practice. You can exercise your rights, seek further information, or raise a concern to us using any of the following ways:

- By amending your data or consent within your service account area;
- By contacting our Moovkids customer services team using <http://www.moovkids.com/contact-us/>;
- By sending a letter to: MoovKids Oy, Finnoonlaaksontie 7, 02270, Espoo, FINLAND

Your rights	Information Commissioner's Office (ICO) Guidance
The right to be informed about the collection and use of your personal data.	https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-be-informed/
The right to have inaccurate personal data rectified or completed if it is incomplete.	https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-rectification/
The right to have your personal data erased in certain circumstances.	https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-erasure/
The right to object to the processing of personal data in certain circumstances.	https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-object/
The right to request the restriction or suppression of your personal data	https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-restrict-processing/
The right to access your personal data.	https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-of-access/
The right to obtain and reuse your personal data for your own purpose across different services.	https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-data-portability/
The right to lodge a complaint with a supervisory authority. In the UK, this is the Information Commissioner's Office.	https://ico.org.uk/for-the-public/raising-concerns/

9. Protection Against Automated Abuse

9.1 We have implemented reCAPTCHA v3 on moovkids.com. Use of reCAPTCHA v3 is subject to the Google Privacy Policy and Terms of Use. reCAPTCHA is only used to fight spam and abuse on our site. reCAPTCHA is not used for any other purpose. By accessing or using the reCAPTCHA APIs, you agree to the Google APIs Terms of Use, Google Terms of Use, and to the Additional Terms. Please read and understand all applicable terms and policies before accessing the APIs: You acknowledge and understand that the reCAPTCHA API works by collecting hardware and software information, such as device and application data, and sending these data to Google for analysis. The information collected in connection with your use of the service will be used for improving reCAPTCHA and for general security purposes. It will not be used for personalized advertising by Google.

10. Data Retention

10.1. We retain personal data for as long as we reasonably require it for legal or business purposes. When determining data retention periods, we take into consideration applicable laws, contractual obligations and the expectations and requirements of our customers. When we no longer need personal data, we securely delete or destroy it.

11. Sale of Business

11.1. If Moovkids Ltd. is sold or integrated with another business your personal data may be disclosed to our advisers, or any prospective purchasers and their advisers, and will be passed on to the new owners of the business.

11.2. In each case, you consent to the processing of data by Moovkids Oy, as data controller. If you don't agree with the terms of this Privacy Policy, then please don't use our service.

11.3. Where the lawful basis of processing your data is consent, you have the right to withdraw your consent at any time. To withdraw your consent, please contact our Data Protection Officer using the details below.

12. Your Consent

12.1. By using or interacting with our service, you are consenting to:

- the use of cookies and other technologies;
- the transfer of your data outside of the country where you live;
- the transfer of your data outside of the European Economic Area;
- the collection, use, sharing, and other processing of your information as described in this Privacy Policy.

13. Changes to this Policy

13.1. We keep this policy under regular review. If we change the content of our Privacy Policy we will post the changes on this page.

Contact Us

If you have any questions about this Privacy Policy, please contact us at: info@moovkids.com