

Privacy Policy

DevCoach Courses (Teachable Platform)

The protection of your personal data is paramount to our business and we aim at taking all necessary technical and organizational measures and using all available resources to ensure that we process your personal data in compliance with the EU General Data Protection Regulation no. 679/2016 (“GDPR”) and all data protection laws and regulations applicable in Romania.

To achieve this purpose, our Privacy Policy details the manner in which we process your personal information and highlights your rights in connection with these processing activities, as provided by the GDPR. Our Privacy Policy will apply to all our users, using our Services hosted on the Teachable platform, either registered or unregistered on our blog.

Please read our Privacy Policy prior to accessing and using any of our services. In case you have any queries regarding this policy, please contact us at hello@sw-foundations.com.

Our Privacy Notice does not apply to the practices of any third-party apps, actions or websites that you may use. You should review the applicable terms and policies for third-party apps, actions, and sites to determine their appropriateness for you, including their data collection and use practices.

We may update and vary from time to time our Privacy Policy, in accordance with the applicable regulatory framework and any variations in the manner in which we process your personal data. Our updated Privacy Policy will be available at all times on our platform.

We do not use cookies, similar technologies or other third-parties technologies. For more information regarding the cookies, similar technologies or other third-parties technologies used by the Teachable platform, please see Teachable Cookies Policy, available here <https://teachable.com/cookies-policy>

The terms of our Privacy Notice are supplemented with the terms of the Privacy Notice of Teachable, the platform that hosts our online course service, available here <https://teachable.com/privacy-policy>

1. Our identity and contact details

Tudorica Gabriel-Ovidiu P.F.A.

hello@sw-foundations.com

Sibiu, Romania

EU ID: ROONRC.F32/811/2019

TAX ID: 41753863

2. Purposes of the personal data processing and legal basis for the processing

Your personal data will be mainly processed by Teachable, the online platform that hosts our online course services. Prior to accessing our page and using our services, please also read Teachable Privacy Policy available here <https://teachable.com/privacy-policy>

We do not collect, use or share any of your personal data, other than your full name and e-mail address.

- **What data we collect**

We will collect and use your full name and e-mail address for the purpose of your account creation and registration with our DevCoach online course services, course attendance and for providing our services to you, as further detailed below.

If you decide to join our mailing list via newsletters or join the DevCoach online course service hosted on the Teachable platform (<https://devcoach.teachable.com/>) we will have access to your email address and it will use it both for communications and for sending you newsletters and notifications for advertising / marketing purposes, subject to obtaining your preliminary consent. If you agree to receive newsletters, advertising / marketing notifications, you will have the option to unsubscribe at any moment, without providing any reason.

This Privacy Notice does not apply to the practices of any third party (non-Google) apps, actions or websites. You should review the applicable terms and policies for third party apps, actions, and sites to determine their appropriateness for you, including their data collection and use practices.

Once you register with our online course services and have an account, we will collect the following information:

For completing the account opening process, you will need to provide personal data, such as full name and e-mail address.

We will collect the personal data you provide, such as your online contact details that are necessary for us to request your consent and communicate with you.

We will collect information about your activity in our online course services, which we use solely for teaching and training purposes, in the context of providing our online course services.

We will collect feedback regarding the course to improve our services.

- **How do We use the Collected Data**

We mainly use your data to provide and improve our online course services, develop and customize our services, and communicate with you during the audio-video online interactions (where applicable).

The processing by us of your personal data is based on:

Letter (a) of Article 6(1) of the GDPR - the data subject has given consent to the processing of his or her personal data for one or more specific purposes;

Letter (b) of Article 6(1) of the GDPR - processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract; and

Letter (f) of Article 6(1) of the GDPR - processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party.

3. Recipients or categories of recipients of the personal data

We will collect, use your e-mail address both for communications and for sending you newsletters and notifications for advertising / marketing purposes, subject to obtaining your preliminary consent. If you agree to receive newsletters, advertising / marketing notifications, you will have the option to unsubscribe at any moment, without providing any reason.

We will not share your personal data with any other third parties nor allow them access your personal data.

For any information regarding the manner and instances in which Teachable may share your personal data with other third parties or otherwise allow them access to it, please refer to Teachable Privacy Policy available here <https://teachable.com/privacy-policy>

4. No transfer of your personal data to a third country or international organization

We will not transfer your personal data to third countries or international organizations.

5. Period for which the personal data will be stored

The personal data collected by us will be used exclusively for the purposes described in Section 2.

The data collected will be stored in our electronic database system, which is accessed by authorized persons and on a “need to know basis only”

We will take all steps to erase your personal data and remove it from our systems when such data is no longer required for the purpose (including any directly related purpose) for which it was collected and used.

The storage of the personal data collected will not exceed 30 days from the moment such personal data is no longer required for the purpose for which it was collected, used and shared. We will use your email address during and after the course period for the purpose of sending the newsletters and promotions materials unless you unsubscribe from receiving letters or request us to delete your email address, in which case we will immediately proceed accordingly.

6. Right to withdraw consent

Where personal data was collected based on your consent, you are entitled to withdraw your consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

7. Right to request access to personal data

You shall have the right to obtain from us confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, access to the personal data and other relevant information, as provided by law.

Where personal data are transferred to a third country or to an international organization, you shall have the right to be informed of the appropriate safeguards pursuant to Article 46 of the GDPR relating to the transfer.

We may provide upon request a copy of the personal data undergoing processing.

8. Right to request rectification of personal data

You shall have the right to obtain from us without undue delay the rectification of inaccurate personal data concerning you.

You shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

9. Right to erasure of personal data (right to be forgotten)

You shall have the right to obtain from us the erasure of personal data concerning you without undue delay and we shall have the obligation to erase personal data without undue delay in the conditions provided by law.

Where we have made any personal data public and are obliged to erase the personal data, taking account of available technology and the cost of implementation, we shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that you have requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

10. Right to request restriction of processing

You shall have the right to obtain from us the restriction of processing of personal data, in the conditions provided by law.

Where processing has been restricted, such personal data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the European Union or of a Member State.

Once you have obtained a restriction of processing you shall be informed by us before the restriction of processing is lifted.

We shall communicate any rectification or erasure of personal data or restriction of processing to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort.

We shall inform you about those recipients if you request it.

11. Right to object to processing

You shall have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal data, when the processing is justified by:

the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;

the purposes of the legitimate interests pursued by us or by a third party.

We shall discontinue processing your personal data unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.

Where personal data are processed for direct marketing purposes, you shall have the right to object at any time to processing of personal data concerning you for such marketing, which includes profiling to the extent that it is related to such direct marketing.

Where you object to processing for direct marketing purposes, your personal data shall no longer be processed for such purposes.

12. Right to data portability

You shall have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from us, where the processing is:

based on consent or on a contract; and

carried out by automated means.

In exercising your right to data portability, you shall have the right to have the personal data transmitted directly from us to another controller, where technically feasible.

The exercise of the right to data portability shall be without prejudice to the right to request erasure of data (right to be forgotten).

13. Right to lodge a complaint with a supervisory authority

You shall be entitled to lodge at any moment complaints with the Romanian Data Protection Authority for any matters that may arise in relation with the collection and processing of your personal data by us, at the contact details below.

Autoritatea Națională de Supraveghere a Prelucrării Datelor cu Caracter Personal (Romanian Data Protection Authority)

28-30 General Gheorghe Magheru Blvd. Sector 1, CP 010336, Bucharest, Romania

Phone: +40.318.059.211 or +40.318.059.212;

E-mail: anspdc@dataprotection.ro

For more information about the Romanian Data Protection Authority and contact details, please visit its website at <http://www.dataprotection.ro/>

14. Automated decision-making, including profiling

We do not operate and do not use in our activity any automated decision-making processes or profiling processes.

Should we be required or otherwise decide to implement at any time such processes, you shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

15. Obligation to notify you regarding rectification or erasure of personal data or restriction of processing

We shall communicate any rectification or erasure of personal data or restriction of processing carried out to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort.

We shall inform you about those recipients if you request it.

16. Further process of the personal data for other purposes

We shall not process further the personal data for a purpose other than that for which the personal data were collected. Should such further processing occur at any time, we shall provide you prior to that further processing with information on that other purpose and with any relevant further information as required by law.