

Privacy and Cookie Statement

This Privacy and Cookie Statement was last updated on 2020-8-25.

Electude Development B.V. and its affiliates or subsidiaries ('Electude') is responsible for the processing of personal data in the Electude HowTo website (howto.electude.com) as described in this privacy statement.

For the specific processing operations on the Electude HowTo website Electude determines the purposes and means of the processing of personal data. This applies, for example when you log in to the website and use the website to produce learning material as it is aimed for. The following privacy statement applies to such use.

Personal data we process

Electude processes your personal data when you make use of our services and/or in case you provide your personal data to us yourself. Below you will find an overview of the personal data we process:

- username and password;
- contact details: email, (mobile) phone;
- invoice and payment information;
- log file information of the web servers: IP address, request time, browser type and version, referrer URL.

Special and/or sensitive personal data

Electude does not intend to collect data about website visitors who are younger than 16 years, unless they have permission from parents or guardians. However, we can not verify if a visitor is older than 16. We encourage parents to be involved in the online activities of their children, in order to prevent data about children being collected without parental consent. If you are convinced that we have collected personal data about a minor without this consent, please contact us via privacy@electude.com, then we will delete this information.

No special categories of personal data with sensitive information are processed.

For what purpose and on what basis we process personal data

For to the performance of a contract, we process data for these purposes:

- handling your payment;
- to be able to call or email you in case this is required to provide our services;
- to inform you about changes to our services and products;
- to deliver goods and services to you;
- identification, authentication and access control to the service;

- to get product support.

Due to our legitimate interests, we process data for these purposes:

- security and prevention of abuse;
- ensuring continuity and integrity;
- generation of anonymized statistical overviews to improve the service.

When you have given us explicit consent we process data:

- to send our newsletter and / or advertising brochure.

Electude also processes personal data if we are legally obliged to do so, such as information that we need for our tax declaration.

Automated decision-making

Electude does not make decisions which can have (severe) consequences for people based on automated decision-making.

How long we store personal data

Electude does not store your personal data longer than is strictly necessary to realize the purposes for which your data is collected.

For the performance of a contract we need the data listed below. We keep this information as long as required to deliver our services and perform our contracts. Then we destroy it, unless legal obligations require us to keep it longer.

- username and password;
- contact details;
- invoice and payment information.

Due to our legitimate interests we use these data:

- log file information of the web servers.

We keep this information for 1 year, then we destroy it.

Sharing personal data with third parties

Electude shares your personal data with third parties only if this is necessary for the execution of our agreement with you or to comply with a legal obligation. With companies that process your data in our assignment, we conclude a processor agreement to ensure the same level of security and confidentiality of your data. Electude remains responsible for these processing operations. Electude also provides your personal data to other third parties. We only do this with your express permission.

Currently we use these processors for this web site:

Sub processor	Registered office	Type of processing	Country of processing
OVH B.V.	Dordrecht, Netherlands	Hosting services (web and database server)	Canada
LeaseWeb USA Inc.	Manassas, Virginia, United States	Hosting services (email)	United States
TransIP B.V.	Leiden, Netherlands	Hosting services (email)	Netherlands
Cloudflare Inc.	San Francisco, United States	Internet security services, content delivery network	Depends on user location
Adyen B.V.	Amsterdam, Netherlands	Payment services	European Union

Cookies

Electude uses only technical and functional cookies. A cookie is a small text file that is stored on your computer, tablet or smartphone when you first visit this website. The cookies we use are necessary for the technical operation of the website and your ease of use. They ensure that the website works properly and remember, for example, your preferences. We can also optimize our website with this. You can opt out of cookies by setting your internet browser so that it does not store cookies anymore. In addition, you can also delete all information previously saved via the settings of your browser.

name	purpose	type	duration
LMSSID	keep you logged in on the site	session	is deleted when you log out or close the browser
PHPSESSID	keep you logged in on the site	session	is deleted when you log out or close the browser
__cfduid	to identify individual users behind a shared IP address, to prevent abuse, set by Cloudflare	persistent	1 year

Access, rectify or erase data

You have the right to access, rectify or erase your personal data. Besides you also have the right to withdraw your permission for processing your data, to object against the processing of your personal data by our organization and to apply for data portability. This means you can request us to send your personal data (that we have in our possession) through a computer file to you or somebody else, or to an organization of your choice.

You can send a request for access, rectification, erasure, data transfer of your personal data or request for cancellation of your consent or objection to the processing of your personal data to privacy@electude.com.

To ensure that the request for access has been made by you, we ask you to send a copy of your ID with the request. Make sure you make a copy which does not show your passport

photo, machine readable zone (set of numbers at the bottom of the passport), passport number and citizen service number. This is to protect your privacy. We respond as quickly as possible to your request, but within four weeks.

Security measures

Electude takes the protection of your personal data very seriously and takes appropriate measures to prevent the abuse, the loss, unauthorized access, unwanted publication and unauthorized change of this data. If you get the idea that your personal data is not secured properly, or that there are signs of abuse, please contact us via support@electude.com. Electude has taken the following security measures to protect your personal data:

Organisation of information security and communication

- Electude has a security officer to identify risks with regard to the processing of Personal Data, raise security awareness, monitor resources and take measures to ensure compliance with the information security policy.
- Information security incidents are documented and are used for optimisation of the information security policy.
- Electude has set up a process for communication about information security incidents.

Employees

- Employees have signed non-disclosure agreement agreements and an information security policy is established.
- Electude stimulates awareness, education and training of information security.
- Employees do not have access to more personal data than is strictly necessary for their position.

Physical security and continuity of resources

- Personal data are only processed in a closed, physically secure environment with protection against threats from outside.
- Personal data are only processed on equipment where measures have been taken to physically secure the equipment and ensure continuity of service.
- A backup is periodically made for the benefit of the continuity of service. This backup is be treated confidentially and kept in a closed environment.
- The locations where data are processed are periodically tested, maintained and periodically assessed for safety risks.
- Electude has business continuity plans in which redundant locations are included.
- Personal data are only stored in a ISO27001 and/or PCI DSS certified environment.

Network, server and application security and maintenance

- The systems in which Personal Data are processed are protected by proxies and firewalls. Measures against abuse and attacks have been implemented.
- The systems in which Personal Data are processed are monitored.

- The service within which Personal Data is processed is based on system planning, security control and acceptance. Changes in applications are tested for vulnerabilities before they are taken into production.
- Appropriate security patches will be applied to systems in a timely manner.
- Personal data processed within applications are classified according to risks.
- Penetration tests and vulnerability assessments are performed periodically.
- Information that is no longer used will be deleted.
- Passwords are only stored in encrypted form.
- Data are only be transmitted in encrypted form.
- Emails are sent using SPF, DKIM and DMARC to prevent sender fraud.

Changes

Electude reserves the right to change this Privacy and Cookie Statement. Changes will be published on this site. Therefore, you are advised to check this Privacy Statement regularly. By using the Electude HowTo website you agree to the (updated) Privacy Statement.

Contact and complaints

In this statement we wish to inform you of our privacy policy. If you have any questions or want more information, please contact us at:

privacy@electude.com

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Electude also wants to point out that you have the right to file a complaint with the [Dutch Data Protection Authority](#).

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