Privacy Policy

Luxembourg Tech School (LTS) asbl ("us", "we" or "our") operates educational classroom classes in modules, workshops, online courses, events, projects and challenges (hereinafter referred to as the "Service").

We aim to be completely transparent with how we collect and use personal information we gather about our users. Our users' privacy is important to us and we will protect and respect the personal information of all users who use or access our Service. This document informs you of our policies regarding the collection, use, and disclosure of personal data when you use our Service and the choices you have associated with that data. We use your data to access the Service and for purely educational purposes. By using or accessing the Service in any manner, you agree to the collection and the use of your information in accordance with this policy.

LTS collects and processes your personal data in the framework of your registration to the Service and the delivery of the content and challenge. LTS processes and keeps your personal information only to the extent necessary to fulfil the Service.

How does LTS asbl control and process the data?

We are the Data Controller, as we determine the means and/or purposes of the personal information processing. Simultaneously, we are a Data Processor, as we carry out personal information processing tasks, in order to accomplish our purposes.

The Data Controller is responsible of controlling that the data of users is processed in a proper manner and shall take appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the data.

In addition to the Data Controller, in some cases, the data may be accessible to certain types of persons in charge, involved with the operation of the service (developers, analysts, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, institutions, online platforms) appointed, if necessary, as Data Processors by the owner. The updated list of these parties may be requested from the Data Controller at any time. The data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated.

Currently, the Data Processors are LTS asbl itself and the software tools and online services listed in Appendix 1.

General Data Protection Regulation (GDPR)

What information does the Service collect?

Information You Provide to Us:

We receive and collect any information you consciously provide to us. For example, if you contact us (via Microsoft Teams, Microsoft Forms, Eventbrite Inc., email, letter or form), e.g., for a support request or for courses and events registration: Name, e-mail address, age,

gender, school name, information on our communication with you and any additional information you provide us with.

We do not recommend you to share any private data with the other participants while using this Service and any of the software tools and online services listed in Appendix 1.

Information Collected Automatically

LTS does not collect any information automatically, the main communication tool is Microsoft Teams which is provided under the Microsoft Office 365 license managed by the Luxembourg Centre de Gestion informatique de l'éducation https://portal.education.lu/cgie/, GDPR compliance https://portal.education.lu/cgie/SERVICES/GDPR/GDPR-FAQ. For mandatory and optional software tools and online services (listed in Appendix 1), which required user registration, possible actions for students under 16 years old are indicated.

Will Service share any of the personal information it receives?

Once assured that we have the appropriate security and contractual guarantees to protect your information, we will share this one with:

- Third parties for legal reasons: we must share your personal information with law enforcement, regulators and other legal parties, in order to comply with the law, enforce our legal claims and/or protect the integrity and security of our Service and our users' information.

Is your personal information secure?

We strive to protect the privacy of your personal information that we have in our records, but unfortunately, we cannot guarantee complete security. Unexpected events such as, unauthorized entry or use, cyber-attacks, hardware or software failure, and other factors, may compromise the security of user information at any time.

Since you will access our Service via Microsoft Teams and the software tools and online services listed in Appendix 1, you must prevent unauthorized access to your account and personal information by selecting and protecting your password and/or other sign-on mechanism appropriately and limiting access to your computer or device and browser by signing off after you have finished accessing your account.

How long will we keep your information?

We will store personal information for as long as the user uses our Service. For inactive users during a period of 6 months, their information will be deleted, excluding education records and certificates.

What rights and choices do you have?

You have the right, at any time, to know whether your personal data has been stored and can consult the Data Controller to learn about your contents and origin, to verify your accuracy or to ask for them to be supplemented, cancelled, updated or corrected, or for their transformation into anonymous format or to block any data held in violation of the law, as well as to oppose their treatment for any and all legitimate reasons. Requests should be sent to the Data Controller at the contact information set out below.

You can also always opt not to disclose information to us by not using or accessing the Service or any contact form towards us. You may stop using the Service at any time. If you remain inactive for a period of 6 months, your information will be immediately and entirely erased from our records.

You also have the right to expressly request the deletion of all your information at any time and we will immediately and entirely erase your information from our records. The process to request the deletion of your information may be done by sending us an email to info@techschool.lu expressing that you want us to delete your information from our records.

Please note that the use or access of our Service binds a contract between you and LTS. Your use of the Service is also governed by and subject to the terms and conditions for the software tools and online services listed in Appendix 1, which are incorporated in the appendix as reference and form part of the terms of this policy. You are solely responsible for complying with the terms and conditions for the software tools and online services listed in Appendix 1. Please note that you must agree to and accept all the terms of this policy, or you do not have the right to use the Service.

Will this Privacy Policy ever change?

The Data Controller reserves the right to make changes to this privacy policy at any time by giving notice to its users on this page. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom. If a user objects to any of the changes to the policy, the user must cease using this application and can request that the Data Controller remove the personal data. Unless stated otherwise, the then-current privacy policy applies to all personal data the Data Controller has about users.

You must agree to and accept all the terms of this policy, or you do not have the right to use the Service. If you use or access the Service in any way, it means that you agree to this policy and this one will remain in effect while you use the Service.

Additionally, we will not be responsible for you using the Service in a way that violates the law.

What if you have questions about this Policy?

If you have any question regarding our privacy policy, please do not hesitate to send us a detailed email to info@techschool.lu.

APPENDIX 1

Software Tools and Online Services

This appendix describes the usage of software and services used at LTS and possible action required for students under 16 years old as per activities:

Action 1: Authorization to use this software and/or online service from parent(s) or legal guardian must be filled out via "Parental Agreement Form" at the beginning of the school year or sent to info@techschool.lu indicating:

- Parent name authorizing it
- Software / Online Service authorized
- Full name of the student
- Student email use in this Service

A1.1 General to all LTS Activities

Software / Online Service	Usage (Mandatory or Options)	Purpose	Action for students under 16 years old
Microsoft Teams (Software & Online Service)	Mandatory, Provided by the Ministry of Education via CGIE GDPR info	• Communication • File Sharing • Videoconferencing • Live Streaming	• For students with @school.lu or @student.eursc.eu email no action required, • For all others **Action 1** is required (see above)
Microsoft Outlook / Email (Online Service)	Mandatory, Provided by the Ministry of Education via CGIE GDPR info	• Communication	• For students with @school.lu or @student.eursc.eu email no action required, • For all others **Action 1** is required (see above)
Microsoft O365 Apps (Software & Online Service)	Mandatory, Provided by the Ministry of Education via CGIE GDPR info	• Online Forms	• For students with @school.lu or @student.eursc.eu email no action required, • For all others **Action 1** is required (see above)
Eventbrite (Online Service)	Optional Privacy Policy	• Courses, workshops, Events and Challenges registration • Only names and emails are collated via Eventbrite if additional info is needed, Microsoft O365 Forms is used	• Parent(s) or legal guardian need process the registration
Google (Online Service)	Optional No registration required. Privacy Policy	• Searching information	**Action 1** is required (see above)
YouTube (Online Service)	Optional No registration required. Policies and Safety	• Classes and events video content	No action required

Bitly (Online Service)	Optional No registration required. Privacy Policy	• Short URLs redirect of Microsoft Forms or Eventbrite links	No action required
Microsoft Visual Studio Code (Software)	Optional No registration required. License Privacy Policy	• Text and Code Editor	No action required
Microsoft Visual Studio Community Edition (Software)	Optional Privacy Policy	• Code Editor	No action required
Discord (Software & Online Service)	Optional Registration is required. https://discordapp.com/privacy	• Communication • Off school LTS community	**Action 1** is required (see above)

A1.2 Level G0 and the Creative Coding Online Course and Art Challenge

Software / Online Service	Usage (Mandatory or Options)	Purpose	Action for students under 16 years old
p5.js Editor (Online Service) & libraries	Mandatory https://editor.p5js.org/ Free, open source JavaScript library. Created by the non-profit Processing Foundation https://processingfoundation.org/	• Creative Coding • Creation of animated graphics	• **Action 1** is required (see above) To be able to save files a free sign up with a name / email address is required.
Open Processing (Online Platform)	Mandatory To be able to save files a free sign up with a pseudonym is required. https://openprocessing.org	• Creative Coding • Creation of animated graphics	• **Action 1** is required (see above) To be able to save files a free sign up with a name / email address is required.
ml5.js (Software)	Mandatory https://ml5js.org/	• Creative Coding • Using pretrained Machine Learning Models for p5 sketches	No action required
Teachable Machine	Optional https://teachablemachine.withgoogle.com/		No action required
code.org (Online Service)	Optional https://code.org/tos	• Binary game	No action required

A1.3 Level One and the Game Development Online Course and Challenge

Software / Online Service	Usage (Mandatory or Options)	Purpose	Action for students under 16 years old
Unity Hub, Unity & Unity Asset Store (Software) https://unity.com/	Mandatory Registration required https://unity3d.com/legal/gdpr https://unity3d.com/legal/privacy-policy	• Game Development Engine • Management of Unity installations and projects. • Access to third-party game development assets	**Action 1** is required (see above)
Adobe Photoshop (Software)	Optional GDPR	• Creation of artwork	**Action 1** is required (see above)
Gimp (Software)	Optional No registration required. FAQ	• Creation of 2D artwork • Alternative to Photoshop	No action required
Krita (Software)	Optional No registration required. Privacy Statement	• Creation of 2D artwork • Alternative to Photoshop	No action required
Blender (Software)	Optional No registration required. Privacy Policy	• Creation of 3D artwork	No action required
PureRef (Software)	Optional No registration required. Privacy Policy	• Creation of Moodboards • Management of references	No action required
Piskel (Online Service)	Optional No registration required. Privacy Policy in FAQ	• Creation of 2D Pixel Art • Alternative to Photoshop	No action required
Anaconda https://www.anaconda.com/	Mandatory https://www.anaconda.com/privacy-policy	• Open-source toolkit with over 7,500 data science and machine learning packages makes it easier to perform any kind of data analytics using Python	**Action:** Download & Install
Thunkable (Online Service) https://thunkable.com/	Mandatory https://thunkable.com/#/privacy	• Design & prototyping mobile applications • Programming different functionalities	**Action 1** is required (see above)
Open Bank Project PSD2 Sandbox (Online Service) https://psd2-portal.openbankproject.com	Mandatory https://www.openbankproject.com/privacy-policy/	• Open-source API for simulating bank transactions	**Action 1** is required (see above)
Visual Studio Code https://code.visualstudio.com/	Mandatory https://privacy.microsoft.com/en-GB/privacystatement	• Visual Studio Code is a freeware source-code editor.	**Action:** Download & Install

A1.4 Level Up

Software / Online Service	Usage (Mandatory or Options)	Purpose	Action for students under 16 years old
CoCalc (Online Platform) https://cocalc.com	Mandatory Virtual online workspace https://cocalc.science.uu.nl/policies/privacy.html	• Programming Machine Learning models	**Action 1** is required (see above)
Voiceflow (Online Platform) https://www.voiceflow.com	Mandatory Platform to build chatbots https://www.voiceflow.com/privacy	• Implementation of voice and chat assistants	**Action 1** is required (see above)
Fitbit Studio & Fitbit OS Simulator (Online Service & Software) https://studio.fitbit.com	Mandatory Platform to create and test Fitbit-specific apps https://www.fitbit.com/global/us/legal/privacy-policy	• Development of Fitbit-specific applications for later installation on a physical device	**Action 1** is required (see above)
ROS Development Studio (Online Service) https://www.theconstructsim.com	Mandatory Platform to learn Robotics from Zero https://www.theconstructsim.com/privacy_policy/	• Development of robot control programs	**Action 1** is required (see above)
Runway ML (Online Platform) https://runwayml.com	Mandatory Machine Learning platform for creators https://runwayml.com/privacy-policy/	• Exploration and use of trendy machine learning models in a very intuitive way	**Action 1** is required (see above)
Gmail (Online Service) https://www.gmail.com	Mandatory Free email service provided by Google https://policies.google.com/privacy	• Account required to access and use Google platforms mentioned below	**Action 1** is required (see above)
Google Apps & Online Services dedicated to the use of AI and ML (e.g., Google Colab)	Mandatory Artificial Intelligence and Machine Learning products and services https://policies.google.com/privacy	• Exploration and development of deep machine learning models	**Action 1** is required (see above)