**Privacy Policy**

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| **Name of the service** | SafeMa Virtual Learning Platform |
| **Description of the service** | The SafeMa Virtual Learning Platform is both a Content and a Learning Management System, based on the open courseware development platform Open edX (openedx.org), delivered in the context of the European-Commission-funded project SafeMa (Project N°: 598946-EPP-1-2018-1-VN-EPPKA2-CBHE-JP, Grant Agreement no. 2018-3857/001-001, https://safema-project.eu). It offers free blended courses in Advanced Midwifery Practice. |
| **Data controller** | SafeMa Consortium |
| **Contact Details** | The Coordinator of the project and organization authorized to communicate on behalf of the consortium in matters related to this service, is the National and Kapodistrian University of Athens (NKUA), Greece.  The relevant Project Manager is Ms. Evika Karamagioli and can be reached at karamagioli@gmail.com.  The postal address of the National and Kapodistrian University of Athens (NKUA) is: 1 Rimini Str., Chaidari 12642, Greece, att. Ms. Evika Karamagioli. |
| **Personal data processed** | Specific information is needed in order to register with this service. The minimum information required is:   * Email * Full name * Public username * Password * Country or Region of residence   (Personal Information Group A)  After an account has been created in the system, you will be able to enrich your profile with further information.   * Gender * Time Zone * Level of Education * Year of Birth * Preferred Language   (Personal Information Group B)  If you want to promote your accomplishments (relating to courses of this platform) you can use the links to the social media. To do so you could insert your social media links information:   * Facebook Link * Instagram Link   (Personal Information Group C)  When you participate in courses through this platform, information regarding your participation and performance are retained. Such information is:   * Number and name of enrolled courses * Time of enrolment to the courses * Time spent on the courses * Completion time of the courses * Performance on quizzes * Answers to questionnaires * Certificates of completion * Questions and comments posted on the chat function * Questions and feedback received through other communication channels of the platform * Time spent on videos or other course material * Count of page visits   (Personal Information Group D) |
| **Why we process this information** | SafeMa Partners use information, including Personal Information, to carry out the following purposes per group of Personal Information:  Personal Information Group A   * Create an account for you in order to gain access to this Platform. The information of this Group is mandatory and without it no account can be created (needed to perform the service). * Offer and improve products and services. This includes enabling you to navigate the SafeMa Platform, to enroll and participate in courses and programs on the SafeMa VLE and to learn effectively in such courses and programs. * Communicate with you. This includes answering your course and platform questions, notifying you of course and SafeMa VLE maintenance and updates, marketing to you about related subjects.   Personal Information Group B   * Comply with the requirement of the Grant Agreement no. 2018-3857/001-001, for the European-Commission-funded project SafeMa (Project N°: 598946-EPP-1-2018-1-VN-EPPKA2-CBHE-JP). * The design of this project (through which you have access to the relevant courses) demands the measurement of specific KPIs. The information of this Group cover the majority of these KPIs.   Personal Information Group C   * Facilitate the promotion of your achievements to the public through social media interconnections. This information is optional.   Personal Information Group D   * Operate and improve the SafeMa Platform. This includes creating and improving features that support the SafeMa community and enable SafeMa VLE usage at scale. This also includes personalizing the SafeMa VLE, so your learning experience is tailored to your interests and needs. * Communicate with you. This includes answering your course and platform questions, notifying you of course and SafeMa VLE maintenance and updates, marketing to you about course offerings, programs, news, and related products and services of SafeMa project, and as permitted under applicable law, sending you communications about news and events. * Support scientific research including, for example, in the areas of cognitive science and education. This includes collaborating to enable and conduct research about how learners access and master course materials online. Where necessary to extract these conclusions all personal information is anonymized. * Develop and maintain the security and performance of the SafeMa Platform. This includes tracking SafeMa VLE outages and creating software solutions, detecting violations of the Honor Code and Terms of Service, and monitoring uses, misuses, and potential misuses of the SafeMa VLE. * Track SafeMa Platform usage against goals and mission. This includes performing analytics to evaluate access to and performance in courses and course-related products and services and to report aggregate usage information (not Personal Information) to Partners and the European Commission.   Exercise, enforce, and comply with legal rights and obligations. This includes responding to subpoenas, court orders, or other legal process; and investigating, preventing, or taking action regarding illegal activities, suspected fraud, security or technical issues, or to protect the rights, property, or safety of SafeMa VLE, or others, and as otherwise required by applicable law.  No Automated individual decision-making, including profiling takes place regarding your personal information and your experience within this Platform. |
| **Online Events Privacy Statement** | SafeMa consortium respects the privacy of the people who register to our online events and ensures the confidentiality of the personal data participants provide to SafeMa consortium. Please note that by registering to SafeMa online events, you agree that your personal data will be collected and further processed for the efficient organisation and management of the event (including preparation of lists for contacts, participant lists, circulating pre-event information and meeting follow-up). Please also note that the SafeMa consortium online events may be audio or video recorded. The SafeMa online events recordings will be later used as educational material for the SafeMa course. When attending the online events you agree on the collection and on the processing of your personal data and on the publication of the audio and video recordings on the virtual learning environment of the project (https://vle.safema-project.eu/). The information will be used only for operations related to the SafeMa course and will not be used for any other reason. If during the lifetime of the project, some other need will arise then we will request your approval prior to processing your information. We will not use your information for profiling or for automated decision-making. |
| **Third parties to whom personal data is disclosed** | The SafeMa Consortium partners, the European Commission, , the host of the platform for facilitating the above-mentioned purposes. |
| **Data retention** | We will retain your personal data for the duration of the project (up to 14/11/2021) and for a period of five (5) years after the last installment as mandated by the relevant grant agreement. After this period your data will be irrevocably deleted. |
| **Data subject rights** | You have the following rights to your data:   * Right of access by the data subject * Right to rectification * Right to erasure (‘right to be forgotten’) * Right to restriction of processing * Right to data portability |
| **How to exercise your rights** | You can modify your information, access your data and delete all your information and profile through the platform.  (Log in to your account and change any information or delete the account through the Account Setting tab).  Exceptions:   * Deletion will not apply to historical activity logs or archives. * Records of past interaction and transactions cannot always be deleted.   In such case you can request a deletion account to [team@read-lab.eu](mailto:team@read-lab.eu). The SafeMa platform will permanently deactivate your account, remove the active profile, retire your username and remove you from the email lists.  If you need to have access to all the information we process for you or to request restriction of processing, data portability or further information regarding your Personal information please contact us at the National and Kapodistrian University of Athens (NKUA), Greece.  The relevant Project Manager is Ms. Evika Karamagioli who can be reached at karamagioli@gmail.com  The postal address of the National and Kapodistrian University of Athens is 1 Rimini Str., Chaidari 12642, Greece, att. Ms. Evika Karamagioli. |
| **Complaint to the relevant authority** | You have the right to lodge a complaint with the relevant data protection authority.  More information about the process can be found at:  <https://www.dpa.gr/> |