Eduface

Privacy Statement

Last revised: 21-3-2025

TL;DR:

At Eduface, **your privacy comes first**. We **do not** use your personal data or student work to train our AI models by default. Any training would only happen if you explicitly choose to opt in.

All data is **securely stored** and **encrypted** using trusted cloud infrastructure in the **EU**. We apply strict privacy measures and **never** share your data without your permission. You're always in control, and your information is only used to provide feedback—not for anything else.

Questions? Reach out to us at **info@eduface.me**.

Introduction

Eduface, a trade name of Blockbook B.V. (Chamber of Commerce number: 89149033), legally registered at Langegracht 70, 2312 NV Leiden, Netherlands, respects the privacy of its users and ensures that the personal information you provide to us is treated confidentially. This privacy statement informs you about how we collect, use, protect, and share your personal data. We process personal data in accordance with the General Data Protection Regulation (GDPR) and other relevant laws and regulations.

Contact Information of the Data Controller

- **Name:** Eduface (Trade name of Blockbook B.V.)
- **Address:** Langegracht 70, 2312 NV Leiden, Netherlands
- **Email:** info@eduface.me

For any questions regarding this privacy statement or the processing of your data, you can contact us.

What Personal Data Do We Process?

Eduface processes various types of personal data depending on how you use our services. Below is an overview:

1. **Identification and Contact Information**

   - First and last name
   - Address details
   - Phone number
   - Email address

2. **Account Information**

   - Username
   - Password (encrypted storage)
   - Profile information (such as preferences or settings)

3. **Technical Data**

    ○ IP address
    ○ Browser information
    ○ Cookies

4. **Usage Data**

    ○ Activity logs (such as login times and performed actions)
    ○ Frequency and duration of your sessions
    ○ Pages and features you use

5. **Content Data**

    ○ Study assignments (such as essays, reports, or reflective writing)
    ○ Assessment forms you use or create
    ○ Feedback generated by our AI models based on your input

6. **Communication Data**

    ○ Emails you send us, including content
    ○ Information provided through contact forms
    ○ Phone calls (if recorded with consent)

Data Processing and AI Training

Eduface processes personal data for feedback generation using AI models. However, the personal data provided will not be used for AI training, nor will it be stored beyond the processing period. AI training is optional and automatically turned off. Any further use of student assessments beyond evaluation feedback, such as AI training, would require the explicit action of a User (teacher or student). We may ask Users optional questions that go into the quality of the feedback given, these will clearly state that the response will be used for supervised training of the model.

Data Protection and Cloud Storage Arrangement

Eduface employs several privacy and security measures, including data isolation, encryption, and options for anonymity. All personal data is processed within Google Cloud infrastructure, specifically within storage locations in **Eemshaven, Netherlands**. Eduface operates under a **Google Cloud Infrastructure-as-a-Service (IaaS) arrangement**, ensuring strict security compliance. Data encryption is applied both in transit and at rest. Besides Google cloud, Eduface works with Dutch company **railway** for **database** storage. Encryption in railway is applied both in transit and at rest. In case of a security incident, users can contact **info@eduface.me** for immediate support.

Purposes and Legal Bases for Processing

We process personal data solely for legitimate purposes and based on a legal basis. These purposes include:

1. **Performance of a contract (Article 6(1)(b) GDPR):**

   ○ Creating and managing your account
   ○ Providing AI-based feedback on study assignments
   ○ Storing and making study assignments and assessment forms available

2. **Compliance with legal obligations (Article 6(1)(c) GDPR):**

   ○ Meeting tax and administrative obligations
   ○ Responding to requests from regulatory authorities

3. **Legitimate interest (Article 6(1)(f) GDPR):**

   ○ Improving our services and user experience
   ○ Protecting our services against abuse or fraud
   ○ Managing customer relationships

4. **Consent (Article 6(1)(a) GDPR):**

   ○ Sending newsletters and marketing communications if you have given consent

Intellectual Property Rights

Eduface is **not** the rightsholder of student assessments, as the copyright remains with the author (i.e., the student). Any further use of student assessments by Eduface beyond evaluation and feedback (such as AI training) would require prior implicit or explicit agreement. **AI training is optional, and the tool automatically turns training off**, training can be turned on by reaching out to us.

How Do We Collect Your Personal Data?

Your personal data is collected:

● When you create an account or use our services
● When you enter data, such as study assignments or assessment forms
● When you contact us via email, phone, or contact forms
● Through the use of cookies on our website

Retention Periods

We apply the following retention periods for different types of data:

1. **Identification and Contact Information:**

   ○ Retained as long as your account is active or as necessary for customer management.

2. **Account Information:**

   ○ Retained as long as your account is active. Upon termination, data is deleted within 30 days unless legally required otherwise.

3. **Technical Data:**

     ○   Retained for up to 12 months after collection for security and analytical purposes.

4. **Usage Data:**

     ○   Retained for up to 12 months after collection unless required for security purposes.

5. **Content Data:**

     ○   Retained for up to 30 days after processing unless the user deletes it earlier.

6. **Communication Data:**

     ○   Retained for up to 12 months after the last correspondence unless legally required otherwise.

Security Measures

Eduface implements extensive security measures to protect your data:

- **Encryption:** All data is stored and processed in an encrypted manner in the secure Google Cloud and Railway environment using Vertex AI in **the Netherlands**.
- **Access Control:** Only authorized personnel have access to personal data.
- **Security Software:** Use of firewalls, antivirus programs, and intrusion detection systems.
- **Regular Audits:** Continuous monitoring and improvement of our security protocols.

Your Rights

Under the GDPR, you have the following rights:

- Right to access, rectify, and erase data
- Right to restrict processing and data portability
- Right to object to processing based on legitimate interest
- Right to withdraw consent for specific processing activities

You can exercise your rights by sending an email to info@eduface.me. We will respond within 30 days.

Complaints

If you are not satisfied with how we process your data, we encourage you to reach out to us first. After that you can file a complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens) or another competent supervisory authority within the European Economic Area (EEA).

Changes to This Privacy Statement

Eduface reserves the right to change this statement. Please check the latest version on our **website** regularly. The date of the last revision is stated at the top.

Contact Information

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