

PRIVACY POLICY OF THE PARENTAL CONTROL APPLICATION (mOchrona) OF THE NATIONAL EDUCATION NETWORK (OSE)

(Version dated: 01/12/2021)

1. Information about the Parental Control application (mOchrona) of OSE

1. The Parental Control application (mOchrona) of OSE ("the Application") offers a suite of services allowing the User (parent or legal guardian of the Child) or the Headteacher of the School (in the situations indicated herein) to protect the Child against inappropriate online content. In particular, the Application allows to block certain types of content, so that it is not displayed when the Child uses the Internet, or allows access only to selected categories of websites or applications. The User can hide adult content in the search results on the Child's Device. The User can also view a summary of the Child's online activity on the Child's Device.
2. The controller of the personal data collected from the Users of the Application is the owner of the Application: NASK - Państwowy Instytut Badawczy (National Research Institute) with its registered office at ul. Kolska 12, 01-045 Warsaw, whose registration files are held by the District Court for the capital city of Warsaw, 13th Commercial Division of the National Court Register under KRS number 0000012938, REGON: 010464542, NIP: 521-04-17-157 ("NASK - PIB"). NASK-PIB acts as the operator of the National Education Network (OSE) within the meaning of the Act of 27 October 2017 on the National Educational Network (Journal of Laws of 2017, item 2184, as amended).
3. NASK - PIB has appointed a Data Protection Officer, who can be contacted via email at: iod@nask.pl.

2. Purpose and legal basis of data processing in the Application

1. The Application collects information about the Users and the devices they use as follows:
 - a. through information entered by the Application User in the registration form (the legal basis is Art. 6(1)(b) of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation) ("GDPR") - data processing is required for the execution of the provisions of the agreement which the data subject is a party to, or in order to take action at the request of the data subject prior to entering into an agreement);
 - b. through information entered by the Application User in order to register a Child's account (the legal basis is Art. 6(1)(b) of the GDPR - data processing is required for the execution of the provisions of the agreement which the data subject is a party to, or in order to take action at the request of the data subject prior to entering into an agreement);

3. Types of personal data collected in the Application

1. The Application processes the following personal data provided by the Application User:
 - a. e-mail address
 - b. password,
 - c. the name of the User's Child's Account
 - d. the age of the User's Child
2. The Application also records information about the connection parameters (time stamp, IP address of the device on which the Application is installed).
3. The provision of personal data in the registration form is required for the successful conclusion and execution of the agreement, for the provision of electronic services and for the use of the Application functionalities.
4. The Application does not collect information (including personal data) processed by other applications installed on the device on which the Application is installed.
5. The Application does not use information about the Child's activity on the Internet for purposes other than those necessary for the proper provision of services described in the Terms and Conditions for the provision of Electronic services as part of the Parental Control application (mOchrona) of the National Education Network (OSE).

4. Personal data disclosure

1. Personal data of the Application Users provided in the registration form may be disclosed to:
 - a. public authorities and other entities entitled to receive data under applicable laws;
 - b. service providers who process personal data on behalf of NASK-PIB, by operating an ICT network and systems, or by making ICT tools available to NASK-PIB - to the extent necessary for the provision of services by means of the Application;
 - c. NASK-PIB business partners for the purposes connected with the distribution and sharing of the Application (e.g. Google, Apple, Huawei app stores).
 - Google Ireland Limited
Gordon House, Barrow Street
Dublin 4 Ireland
 - Apple Inc.
One Apple Park Way
Cupertino, California, USA, 95014
 - Aspiegel SE, a subsidiary of Huawei incorporated in Ireland
Simmons Court House 1F

Ballsbridge, Dublin, D04 W9H6, Ireland

5. Retention period of the personal data of the Application Users

1. Personal data of the Application Users shall be retained as long as the User makes use of the services, i.e. from the moment the Application is installed on his or her device until it is deleted from that device.
2. In the event of a lack of activity on the User Account for a period of six months, the Account shall be automatically deleted, which the Application User shall be notified about in advance.

6. Rights of the Application Users

1. The Application User has the right to request: access to and rectification of his or her personal data, restriction of data processing and data transfer.
2. The Application User has the right to lodge a complaint with the President of the Office for Personal Data Protection.

7. Automated decision-making

1. In connection with the use of the Application, NASK-PIB may take fully automated decisions in the scope of:
 - a. enabling the User to purchase or prolong the service (within the limits defined by the Terms and Conditions),
 - b. blocking access to specific websites on a device which is connected to the Wi-Fi that uses the service,
 - c. In the event of a lack of activity on the User Account for a period of six months, the Account shall be automatically deleted, which the Application User shall be notified about in advance.

8. Changes to the Privacy Policy

1. The Privacy Policy does not restrict any rights under the law. The Application Owner undertakes to review the Privacy Policy on a regular basis and to amend it, if necessary or desirable, in particular in connection with changes in legislation, new guidelines from data protection supervisory authorities, and best practices in the field of personal data protection. Changes in this Privacy Policy will be introduced by NASK-PIB by posting its updated version on the website of the operator of the National Education Network: www.ose.gov.pl.

9. Information regarding the use of cookies on the website of the Parental Control application (Parental Control) OSE <https://nask-prod-my.safekiddo.net/>

1. Cookies are computer data, in particular text files stored on the terminal device of the Website User. Cookies usually contain the name of the website, the time of their storage on the terminal device and a unique number. The Service Provider uses cookies in order to adapt the Website to the needs of Users.
2. Cookies are used for statistical purposes, and help to understand how Website users use the Website, which allows to improve its structure and content.

3. The Website uses two types of cookies: session cookies and persistent cookies. Session cookies are temporary and remain on the User's device until the User logs off from the website or disables the internet browser. Persistent cookies are stored on the User's device for the time specified in the parameters of the cookies or until they are manually deleted by the User.
4. Web browsing software (internet browser) usually allows the storage of cookies on the User's terminal device by default. The Website Users may always change their settings. It is possible to delete cookies from the Internet browser, and to block them automatically. You can find detailed information at:
 - a) [Internet Explorer](#);
 - b) [Microsoft EDGE](#);
 - c) [Mozilla Firefox](#);
 - d) [Chrome](#);
 - e) [Safari](#);
 - f) [Opera](#).
5. Restrictions on the use of cookies may affect some of the functionalities of the Website. Please note that disabling cookies necessary for authentication, security and remembering user preferences may hinder or, in extreme cases, make it impossible to use the Website.