

Privacy Policy

Version: 3.0, Last Updated: 3.29.2025

1. Introduction

We take your privacy very seriously, and we ask that you read this privacy policy carefully as it contains important information on:

- The personal information we collect about you
- What we do with your information
- Who your information might be shared with

We may change this privacy policy from time to time. You should check this policy occasionally to ensure you are aware of the most recent version that will apply each time you access our website and app.

We also operate in accordance with the **Personal Data (Privacy) Ordinance (PDPO)** of Hong Kong, which means we collect, store, and process personal information in compliance with Hong Kong's data protection requirements. By doing so, we commit to safeguarding your personal data and ensuring it is used only for the purposes outlined in this policy or as permitted by law.

2. Who does this privacy policy apply to?

This privacy policy applies to individuals whose personal information we process, including:

- Our customers, such as school staff or administrators, who use our services to administer tests and retrieve results;
- Prospective customers and recipients of our marketing communications;
- Visitors to our website;
- Our suppliers, service providers, agents, and subcontractors.

We also process personal data of students who engage with our website, app, and services.

3. What Data We Collect And How We Use It

- **Providing Our Services**

We store and process the following data to facilitate online testing, streamline

exam administration, and retrieve exam results:

- **Teacher Data:**
 - *Name and Email Address*: For account creation, login, and communication.
 - *User-Generated Content (e.g., tests, quizzes, exam questions)*: To deliver and manage the tests teachers create on our platform.
- **Student Data:**
 - *Name, Email Address, School ID (if applicable)*: To link test submissions to the correct student, ensure proper record-keeping, and enable educators to administer and review tests.
- **Improving Our Model**

We may **anonymize** submitted test answers and use them to enhance our AI-driven marking models. Anonymized means all personally identifiable information (such as names, emails, and school IDs) is removed or obscured, so the data cannot be traced back to any specific individual.
- **Compliance with Legal Obligations**

Where required by law, we process and retain certain data to meet our statutory and regulatory obligations (for example, responding to lawful requests or court orders).

4. Storage of Your Information and Who It May Be Shared With

We store your personal data on Hetzner US East Servers. These data centers comply with industry-leading security standards to ensure the protection of your information.

We do not sell, rent, or trade your personal data with third parties. We may disclose personal data:

- To service providers who assist in operating our platform
- If required by law enforcement or regulatory authorities.

5. Keeping Your Data Secure

We implement technical and organizational measures to protect your personal data, including:

- **Encryption in Transit and at Rest**
All data transmitted between your device and our platform is encrypted via HTTPS/TLS. We also store data in encrypted form at rest, making it more difficult for unauthorized parties to access or read the data.
- **Role-Based Access Controls**
We use strict, role-based permissions to limit access to your data. Only authorized personnel with a legitimate need—such as providing technical support or conducting system maintenance—can access certain parts of our system.
- **Logging and Monitoring**
Our systems maintain detailed logs of all data access and administrative actions. We continuously monitor our infrastructure to detect unusual activities or unauthorized attempts to access information. Automated alerts notify our security team when potentially suspicious behavior is identified.
- **Incident Response Plan**
In the event of a suspected or confirmed data breach, we follow a documented incident response process. This includes:
 - Quickly investigating and containing the issue.
 - Notifying affected users, and/or relevant authorities, when required by law.
 - Taking corrective actions to prevent similar incidents from occurring in the future.
- **Regular Security Reviews and Testing**
We perform periodic vulnerability assessments of our infrastructure. As part of our commitment to improvement, we may also engage third parties to conduct security audits or penetration tests, ensuring our defenses remain robust against evolving threats.

6. How Long Do We Keep Your Personal Information?

We retain user data only as long as necessary for the purposes outlined in this policy. Our retention policy includes:

- **Active Classes:** We retain student names, emails, and test answers while their teacher's account remains active.
- **Anonymized Data:** Test answers may be anonymized and retained indefinitely to improve our AI models. “Anonymized” means that we remove or obscure any personally identifiable information (PII) so the data can no longer be linked to

individual users, students, or institutions. We will never publicly display, attribute, or share specific user content in a manner that identifies you, your institution, or your students, unless you expressly authorize us to do so. All such processing is carried out in compliance with this Privacy Policy and applicable data protection laws

7. Your Rights

You have several rights regarding your personal data, including:

- Right to Access: You can request a copy of the personal data we hold about you.
- Right to Rectification: You can request corrections to inaccurate or incomplete data.
- Right to Erasure: We retain personal data (including teacher account information, student test data, and related records) indefinitely, unless you or your institution explicitly request deletion or unless otherwise required by law or contractual obligations. Should you request deletion, we will securely dispose of the data using industry-standard procedures to prevent unauthorized access or disclosure. If you or your institution would like your data to be deleted sooner, please contact us at ecoe.main@gmail.com. We will confirm and process your request in accordance with our legal and contractual obligations.
- Right to Restrict Processing: You can request limited processing of your personal data.
- Right to Object: You can object to the processing of your data in certain circumstances.

If you wish to exercise any of these rights, please contact us at ecoe.exam@gmail.com. If we are processing your data on behalf of a School, we will refer your request to them.

8. How to Contact Us

If you have any questions about this privacy policy or the information we hold about you, please contact us at:

Email: ecoe.main@gmail.com

By using our website and services, you acknowledge that you have read and understood this Privacy Policy and agree to its terms.