Privacy Policy

Edudata.io (3460068-8) — Cloudpoint Oy (Business ID 2325703-6, VAT FI23257036) • Malminkaari 17–19 B, 00700 Helsinki, Finland • DPO: tietosuoja@cloudpoint.fi

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We take data protection extremely seriously, complying fully with the General Data Protection Regulation (GDPR) and local educational privacy standards.

Plain-Language Summary for Students & DPOs

We process only standard administrative fields (first name, last name, educational email) for SSO login, browser data, and device data. We never collect sensitive personal history, and you have the absolute right under GDPR to access, edit, or request portability of your data.

EDUDATA.IO PRIVACY POLICY

Version 2.0 | Last updated: November 10, 2026

This is Edudata.io’s Privacy Policy in accordance with the EU General Data Protection Regulation (GDPR), describing the principles under which Edudata.io (hereinafter also "Edudata" or "Data Controller") processes personal data when acting as a Data Controller in connection with the Edudata.io service ('Service'). Edudata complies with Finnish law and the EU General Data Protection Regulation in all its operations.

1. Data Controller and Contact Information

Data Controller: Edudata.io (3460068-8), part of Cloudpoint Oy (2325703-6, VAT ID FI23257036)
Business ID: 3460068-8 / 2325703-6 (VAT: FI23257036)
Address: Malminkaari 17-19B, 00700 Helsinki, Finland
Phone: +358 9 4257 9280
Website: www.edudata.io
Data Protection Officer (DPO) & Privacy Contact Point: email: tietosuoja@cloudpoint.fi (customer support: info@edudata.io)

2. Name of the Register

Edudata Customer, Contract, and Marketing Register.

3. Edudata’s Roles and Purpose of Processing

Edudata’s role in processing personal data within the Edudata.io Service is twofold:

A. Edudata as a Data Processor

In the core operation of the Service (Edudata.io), the Customer (education provider) is the Data Controller and Edudata is the Data Processor. In this case, the Customer determines the purposes and means of processing. This processing takes place in accordance with a separate Data Processing Agreement (DPA).

B. Edudata as a Data Controller

Edudata processes personal data as an independent Data Controller for the following purposes:

- **Customer Relationship Management:** We process data to manage the customer relationship and to fulfill contractual obligations. This may include setting up the customer relationship, support, billing, and reporting. *Legal basis: Legitimate interest and performance of a contract.*
- **Sales and Marketing:** We process data for the sales and marketing of our services, direct marketing, and sending newsletters. *Legal basis: Legitimate interest and consent.*
- **Customer Communication:** We process personal data to handle customer feedback and support requests, as well as to send notifications regarding the services. *Legal basis: Legitimate interest and performance of a contract.*
- **Fulfillment of Legal Obligations and Compliance with Laws:** We may process personal data to fulfill statutory obligations, such as those related to accounting and taxation. *Legal basis: Legal obligation.*
- **Service Development:** The company has the right to use data added to the Service by the Customer, which is not classified as personal data, for the development and improvement of the Service.

We do not perform automatic decision-making or profiling based on personal data that would have legal effects on the data subject.

4. What Personal Data Do We Process and Collect as a Controller?

We collect personal data related to our customers mainly from the individuals themselves or from public sources. The data we process may include:

- **Contact Information:** First name, last name, email address, phone number, other contact details (address).
- **Organization Information:** Job title, name of the organization.
- **Customer Relationship Information:** Information on ordered services and changes to them, billing information, other information related to the customer relationship and ordered services.
- **Marketing Information:** Marketing consents and opt-outs (prohibitions).
- **Website and Contact Information:** Technical data (usage data, device data), cookies, content of the contact.

5. Sources of Personal Data

We process and collect personal data that the user has provided or submitted to us (e.g., contacts, contracts). In addition, we collect data from public sources such as public registers and documents, websites, and social media services.

6. Sharing and Disclosing Personal Data

We use group companies as well as authorized service providers and sub-processors who process personal data on behalf of Edudata (in accordance with DPA v2.0 Annex 1). These include:

- **Google Ireland Ltd** / **Google Cloud EMEA Limited** — cloud infrastructure (`edudata-compliance-prod` , Cloud Run, Cloud SQL, Firestore, Cloud Logging) and AI-assisted document analysis (Vertex AI `europe-north1` Finland and Document AI `eu` multi-region; Customer data is never used to train AI models).
- **HubSpot Ireland Ltd** — B2B CRM, customer support, Trust Center portal, and customer communications (`dataHostingLocation = eu1` , AWS `eu-central-1` Frankfurt, Germany, with Dublin failover; GDPR Permanent Delete ≤ 90 days; Breeze AI training disabled).
- **Datadog, Inc.** — application performance monitoring (APM), security analytics, and error tracking.
- **Aimpulse** — Cloudpoint Oy's dedicated development unit / partner entity (Cairo, Egypt), operating exclusively under Cloudpoint Oy's operational control and ISO/IEC 27001:2022 certified ISMS: software

development exclusively in isolated non-production environment (`edudata-compliance-staging`) using 100% synthetic test data (`CP-ISMS-DLP-001 v1.2`); **no access to operational customer data or personal data in the production environment (`edudata-compliance-prod`)**; EU Standard Contractual Clauses (SCC Module 3) and TIA.

- **Cloudpoint Oy (2325703-6)** — parent company and ISO/IEC 27001:2022 certified platform operator (Prescient Security LLC #123522).
- **Online Partner AB** — local first-line support and reseller partner (Sweden); applicable ONLY where the Customer has contracted via Online Partner AB (does not process data for direct Cloudpoint Oy municipal customers).
- **Visma AB** — used solely for Cloudpoint Oy's statutory B2B financial accounting and invoicing as independent Controller (does not process Edudata.io platform assessment data).

Sub-processors process personal data on our behalf under documented instructions and may not use personal data for their own purposes. All our service providers are committed to complying with the EU General Data Protection Regulation.

7. Transfer of Personal Data Outside the EU and EEA

Primary customer data on the Edudata.io platform is hosted within the EU/EEA (`europe-north1` Finland and `eu` multi-region), and our HubSpot instance is pinned to the EU data center (`eu1` Frankfurt, Germany). To the extent our service providers have US parent companies or software development is performed at Cloudpoint Oy's dedicated development unit / partner entity **Aimpulse** (Cairo, Egypt, isolated non-production environment `edudata-compliance-staging` with 100% synthetic data and no access to production personal data), transfers outside the EU/EEA are safeguarded by the EU–U.S. Data Privacy Framework (DPF), European Commission Standard Contractual Clauses (SCC, Decision (EU) 2021/914, Module 2 and Module 3), and Transfer Impact Assessments (TIAs).

8. Retention, Log Governance, and Deletion of Personal Data

Your personal data will not be retained longer than is necessary for the fulfillment of its purpose of use, the customer relationship, or the contract:

- **Platform Data Deletion & Confirmation Upon Request:** Upon contract termination, primary production databases are deleted within **30 calendar days** and encrypted backups are overwritten within **90 calendar days** (`edudata-ai-db` : 30 days / 7-day backup window). Upon request, the Processor provides a written confirmation of deletion (e.g., via email) once deletion has been completed.
- **3-Tier Audit Log Retention (`CP-ISMS-LOG-001 v1.2` , ISO/IEC 27001:2022 `A.8.15` & `A.8.16`):** Tier 1 (immutable GCP `_Required` Admin Activity and Access Transparency audit logs): **400 days**; Tier 2 (GCP `_Default` Data Access and application security logs): **365 days**; Tier 3 (ephemeral edge and load balancer logs): **15–30 days**.
- **HubSpot CRM & Statutory Accounting:** Customer records in HubSpot undergo permanent deletion (*GDPR Permanent Delete*) within **90 days** of contract termination or upon request. Billing and accounting records are retained for the period required by the Finnish Accounting Act (1336/1997, 6–10 years).

9. How We Protect Your Personal Data

Cloudpoint Oy (2325703-6), operator of Edudata.io's infrastructure and data processing, operates an **ISO/IEC 27001:2022 certified** Information Security Management System (ISMS, Prescient Security LLC, IAS MSCB-267, Certificate `#123522` Issue 1, valid 18.11.2026–17.11.2029, SoA v1.2 dated 20.10.2026; Head Office Malminkaari 17-19 B, Helsinki; validation: `isoteam@prescientsecurity.com`):

- Employees with access to personal data are bound by non-disclosure agreements and statutory confidentiality; access rights are reviewed quarterly and revoked within 24 hours upon termination (`Access Control Policy v1.1.0`).
- Passwordless (*Zero Passwords*) federated SSO (`Google Workspace` / `Microsoft Entra ID` , `CP-ISMS-AUTH-001 v1.1`) is enforced for platform end-users, and administrators use MFA with physical FIDO2/WebAuthn hardware keys (Yubico YubiKey).

- All data is encrypted at rest (`AES-256`) and in transit (`TLS 1.3`), and database connections enforce mTLS client certificates (`TRUSTED_CLIENT_CERTIFICATE_REQUIRED`).
- Our Helsinki headquarters (Malminkaari 17-19B) is protected by electronic access control, 24/7 camera surveillance, and guarding.

10. What Rights Do You Have?

You have the following rights under the GDPR regarding your personal data:

- **Right of access:** The right to know what personal data we process about you and to obtain a copy of it.
- **Right to rectification:** The right to request the correction or completion of incorrect, outdated, or incomplete personal data.
- **Right to erasure:** The right to request the deletion of your personal data if there is no longer a basis for its processing.
- **Right to restriction of processing:** The right to request the restriction of the processing of your personal data in certain situations.
- **Right to object:** The right to object to processing if it is based on legitimate interest and there is no compelling legitimate ground to continue processing.
- **Right to data portability:** The right to receive the data concerning you that has been provided to us based on a contract or consent.
- **Right to withdraw consent:** The right to withdraw your consent at any time if the processing is based on consent.
- **Right to prohibit direct marketing:** The right to prohibit the processing of your personal data for direct marketing purposes at any time.

You can exercise your rights by contacting us at: info@edudata.io.

11. Right to Lodge a Complaint with a Supervisory Authority

You have the right to lodge a complaint with a supervisory authority (in Finland, the Office of the Data Protection Ombudsman).

12. Procedure in Data Breach Situations

Our production environment is monitored automatically 24/7/365. In the event of a personal data breach, we follow a two-stage NIS2 Art. 23 and GDPR Art. 33 model: Stage 1 — preliminary Early Warning to the Customer **no later than 24 hours** after detection; Stage 2 — DPO-verified 8-point report **on the next business day and always within 72 hours**, as well as notification to the supervisory authority and data subjects in accordance with applicable law.

13. Cookies

We use cookies on our website to provide the best possible user experience. Cookies are small text files stored on the user's device. The user can give their consent or refuse cookies via a separate cookie banner.

14. Changes

We reserve the right to make changes to this privacy policy. If we make material changes, we will notify you in advance.