

Privacy Notice - ClipEscola App

Who we are

ClipEscola SA, CNPJ: 24.582.955/0001-62, is a digital transformation platform for schools, unifying communication solutions, virtual learning environments, marketing, and payment methods. It provides services that enable digital integration and communication between parents, students, and educational institutions through web and mobile devices (Android and Apple iOS).

We are committed to safeguarding your privacy. Please read this Notice to learn about ClipEscola's privacy practices and policies regarding User data that are collected and used through the application.

You should only use our application if you accept the terms described in this document. Otherwise, please delete the application from your device. If you have any questions about the Privacy Notice, please contact your Educational Institution.

Data Processing Agent

According to the General Data Protection Law (LGPD) in force in Brazil (Law No. 13.709/2018), the definition of data processing agents are:

Controller: a natural or legal person, whether public or private, to whom decisions regarding the processing of personal data belong; and

Operator: a natural or legal person, whether public or private, that processes personal data on behalf of the Controller.

Your Educational Institution, not ClipEscola, determines how and why your Personal Data is used. With respect to this data, ClipEscola is a Data Processor under the LGPD. This Privacy Notice describes how ClipEscola processes Personal Data as a Data Processor for the purpose of providing the service to your Educational Institution, in accordance with the applicable data processing terms with that Institution.

As the Controller of Personal Data, your Educational Institution is responsible for disclosing individuals' rights ("Data Subjects") and other information related to the collection and use of such data, in accordance with the LGPD and other laws requiring such disclosures.

Scope of this Privacy Notice

This Privacy Notice covers the processing of Personal Data that ClipEscola performs as a Data Processor for and on behalf of your Educational Institution. To the extent that it acts as a Data Controller, ClipEscola processes personal data in accordance with your Educational Institution's Privacy Policy.

About your Personal Data

ClipEscola acts as a Data Processor with respect to any Personal Data included in the Educational Institution's Data. By "Educational Institution's Data," we mean: the content or information that individuals authorized by the Educational Institution send to ClipEscola.

When using our application, we automatically collect your device identification for user authentication. Depending on the version your Educational Institution has opted for, you may be able to send photos, videos, files, or messages. However, ClipEscola will only be the transmission medium, with your Educational Institution being responsible for controlling that data.

We collect information such as location, operating system, access date and time. This information may be aggregated to measure the number of visits, average time spent, views, and other statistics. When this collection can identify the User, we will request their consent.

The information we have about you is treated by ClipEscola as confidential. We are committed to employing all reasonable market efforts to ensure the security of your personal data.

Location services

To provide the solution for managing the entry and exit of Educational Institutions, we use location services on your mobile phone, only when the application is active (including in the background) through checkpoints (coverage area) counted from the origin and destination address of the user previously registered in the application. Such proximity information (which is limited to the distance between the two points and not the exact location of the user) is shared exclusively with the educational institution (Data Controller) linked to the use of the application so that it can make preparations for the receipt or delivery of the child(ren) or dependent(s) to the user who authorized the action.

In the exclusive use case of the application in the SCHOOL BUS module, tracking of the child(ren) or dependent(s) of the user will be done precisely and accurately (as much as possible) while the previously established route is not finalized, and the user and educational institution can track it through the application.

How we use your data

ClipEscola uses Personal Data to provide the service to your Educational Institution, in accordance with the applicable data processing terms with that institution. ClipEscola does not disclose your Personal Data to third parties, except when permitted or requested by your Educational Institution, or when required by law.

The data we collect about you may be shared with:

- Applications or mobile device gadgets (e.g., device calendar, camera, microphone, Google G Suite), when authorized by the User;
- Our service providers, such as: system developer, cloud hosting and storage.

We use Google tools for statistical and performance analysis. Therefore, some data such as device ID, geolocation, access date and time are shared with Google. When this collection can identify the User, we will request their consent.

ClipEscola is committed to using suppliers who are committed to privacy and information security. If you wish to know which companies we use to process some of your personal data, please contact us.

Your rights as a data subject

ClipEscola is a Data Operator under LGPD, therefore, if you want to know what information we process about you, for what purposes we process it, revoke consent, update and correct inaccurate data, as well as request deletion, blocking, portability, review of automated decisions, and information about sharing and international transfers, you should contact your Educational Institution.

If you need more information about our role as Operator, please contact our Data Protection Officer (DPO), Juliana Heller, by email at dpo@clipescola.com.br or through our contact provided on the website www.clipescola.com.br.

User Responsibilities

Users must:

- Insert only true information into the application and be responsible for their statements and authorizations;
- Keep their access data confidential, not disclosing to third parties, and not accessing the application in unprotected locations where third parties have access to such information;
- Immediately contact their Educational Institution or ClipEscola if they suspect that their account in the application has been used by an unauthorized third party or when the account's security has been violated;
- Keep the information and messages received confidential in accordance with the privacy terms of their Educational Institution;
- Not allow third parties to use the application on their smartphone or tablet and strictly comply with all the determinations and procedures provided in this notice.

The messages and any content transmitted by the User through the application are entirely the responsibility of the User, with ClipEscola being exempt from any responsibility, conflicts, controversies, or indemnities arising in any way associated with demands that the User has against third parties with the use of the application.

How long do we keep your data?

The storage period depends on the terms agreed with your Educational Institution and their choices, as well as the type of personal data, purposes, and legal basis. We may also retain your personal data to maintain security, prevent fraud and abuse, and resolve judicial disputes.

Legislation and Forum

This General Terms of Service and Conditions of Use Agreement will be interpreted and applied in accordance with the laws of the Federative Republic of Brazil, regardless of conflicts with the laws of other states or countries, and the forum of the city where the ClipEscola company is located is competent to resolve any doubts arising from this instrument.

The user expressly consents to the jurisdiction of this forum and waives, at this act, any other forum, no matter how privileged it may be or become.

Updates to this privacy notice

Any changes we may make to our Privacy Notice in the future will be posted on this page. We invite you to visit this page frequently to check for any updates or changes to this Notice.

We will update the version number and date of this document every time it is changed.

This is Version 1.1 dated April 3, 2023.