

**INFORMATION ON DATA PROTECTION**  
**FIRSTEP PROJECT COMPETITION**  
**VERSION - 07.01.2022**

The purpose of this document/section is to inform you about the processing of your personal data and your rights as a data subject, in accordance with the **General Data Protection Regulation (EU) 2016/679 ("GDPR")**. Throughout this informative note, the concept of **data subject** has the following meanings: the potential and current participants in the *FirStep Project Competition*, including the students, parents, guardians, teachers, supervisors or legal representatives thereof, the visitors of the website [www.firststep.ro](http://www.firststep.ro) as well as any other natural person whose personal data is processed by the Operator for / in connection with the *FirStep Project Competition (the Competition)*.

**1. Identification data and contact details**

**A. the Operator/the Data Controller - LUMINA EDUCATIONAL INSTITUTIONS**

**LUMINA INSTITUȚII DE ÎNVĂȚĂMÂNT S.A.**, headquartered in Bucharest, 9 Balta Albina Street, 4th Floor, Room 412, District 3, registered with the National Trade Register Office Bucharest under no. J40/14330/2017, tax no. RO4272695, represented by GOKTAS Fatih hereinafter referred to as "**Operator**"

**B. The empowered data processors - THE SCHOOLS FROM LUMINA GROUP IN ROMANIA AND MOLDAVIA**

For Example: Spectrum Bucuresti / Spectrum Constanta/ Spectrum Cluj/ Spectrum Iasi/ Spectrum Ploiesti/ International School of Bucharest/ International School of Oradea/ Liceul International de Informatica Bucuresti/ Liceul International de Informatica Colentina/ Liceul International de Informatica Constanta/ Other Schools part of Lumina Group headquartered in Moldavia, as mentioned in Table 1 below

**Table 1**

No.	School Name	Identification Data and Contact Details
1.	LICEUL TEORETIC INTERNATIONAL DE INFORMATICA BUCURESTI	Bucuresti, str. Balta Albina nr. 9, Sector 3 CIF: 35618226
2.	SCOALA PRIMARA SPECTRUM - BUCURESTI	Bucuresti, str. Balta Albina nr. 9, Sector 3 CIF: 35618196
3.	INTERNATIONAL SCHOOL OF BUCHAREST - Lumina Institutii de Invatamant SA	Str Balta Albina nr.9, etaj 4, camera 412, sector 3, Bucuresti : RO4272695
4.	SCOALA GIMNAZIALA INTERNATIONALA SPECTRUM - CLUJ	Mun. Cluj-Napoca, str. Mănăștur nr. 20, jud. Cluj CIF: 36789135
5.	SCOALA GIMNAZIALA INTERNATIONALA SPECTRUM - IASI	Mun. Iasi, Str. C.A. Rosetti, Nr. 12-14, jud. Iasi CIF: 36692999
6.	SCOALA GIMNAZIALA INTERNATIONALA SPECTRUM - PLOIESTI	Ploiesti, str. Infratirii nr. 4, jud. Prahova CIF: 36868085
7.	International School of Oradea,	Mun.Oradea , Str.Armatei Romane nr 1E, Jud.Bihor
8.	Liceul International de Informatica Constanta,	Bulevardul Tomis nr. 153, Constanța, Jud.Constanta CIF 35564410

9.	Scoala Gimnaziala Spectrum – Constanta	Bulevardul Alexandru Lăpuşneanu nr. 101, Constanța, Jud. Constanta CIF 36868085
10.	INSTITUȚIA PRIVATĂ DE ÎNVĂȚĂMÂNT LICEUL TEORETIC „ORIZONT,, BUCIUCANI,,	Str. Ion Pelivan Nr. 13/A, Mun. Chișinău Md-2064 / Moldova Nr. Înregistrare: 1002600026438
11.	INSTITUȚIA PRIVATĂ DE ÎNVĂȚĂMÂNT LICEUL TEORETIC „ORIZONT,, - DURELSTI	Str. Nicolae Dimo Nr. 22, Or Durlleşti, Mun. Chișinău Nd-2003 / Moldova Nr. Înregistrare: 1002600026438
12	INSTITUȚIA PRIVATĂ DE ÎNVĂȚĂMÂNT LICEUL TEORETIC „ORIZONT,, - CIOCANA	Bd. Mircea Cel Bătrîn Nr. 10/2, Mun. Chișinău Md-2044 / Moldova Nr. nregistrare: 1002600026438
13	INSTITUȚIA PRIVATĂ DE ÎNVĂȚĂMÂNT LICEUL TEORETIC „ORIZONT,, CEADÎR-LUNGA	- Str. Vladimir Lenin Nr. 87, Mun. Ceadîr-Lunga, Md-6101 U.T.A. Gagauz-Yeri / Moldova Nr. Înregistrare: 1002600026438
14	INSTITUȚIA PRIVATĂ DE ÎNVĂȚĂMÂNT LICEUL TEORETIC,,ORIZONT,, - BALTI	Str. Chișinăului Nr. 28, Mun. Bălți, Md- 3110/ Moldova Nr. Înregistrare: 1002600026438

## **2. Contact information of the person responsible with data protection**

The person responsible for the protection of personal data can be contacted by e-mail at [dpo@lumina.ro](mailto:dpo@lumina.ro) ( the subject of the email must be written as „Firststep” in the title of the e-mail) or by mail at the aforementioned address of the Operator/the data controller.

## **3. Personal data processed**

### **A. Personal data processed by the Operator/the data controller - LUMINA EDUCATIONAL INSTITUTIONS**

The Operator processes the following **personal data**:

- a) **personal identification data of the parents / guardians / legal representatives:** last name, first name, e-mail. This is mandatory for the student's registration and participation in the Competition.
- b) **personal data related to a general profile of the student:** last name, first name, school, class, project name, project title, project supervisor's name, Youtube Link (students explaining the the project on a Youtube video), Google site link for digital portfolio, Abstract, Project files including photos, videos, diaries, research, data reports etc. depending on each specific project. This is mandatory for the student's registration and participation in the Competition
- c) **the data you filled out in the registration / pre-registration forms** in the Competition and in the materials and documents attached to them; The data from the registration / pre-registration forms marked as compulsory, but not filled by you, make it impossible for us to register the student's participation in the Competition;
- d) **data resulting from on-site visits;**
- e) **photos, videos;**
- f) **data resulting from the video recordings sent during Competition,** data such as visual images, face images, photographs, screenshots, the association between video images and other personal data processed. This is mandatory for the student's participation in the Competition;

- g) **e-mail address, Internet Protocol ("IP") address, username, password**, processed when browsing the website [www.firststep.ro](http://www.firststep.ro) and when sending e-mails or completing the contact form on the website.
- h) **any other information derived from these** as a result of the processing carried out by the Operator (eg segmentation according to different criteria, the unique identifier generated for each beneficiary of the services provided by the Operator for each individual data subject, the participation in the events organized by the Operator) and any other information that is required to perform the activities permitted by the Operator.
- i) **information about the device used** (such as the hardware model, operating system version, unique device identifiers and information about the mobile network, including the phone number), as appropriate
- j) **journal information** - details on how you used our website, such as search queries, as applicable;
- k) **information about the events that occurred on the device**, such as errors, system activity, hardware settings, browser type, language, date and time of your request, and reference URL;
- l) **cookies** that can uniquely identify your browser when navigating on our website [www.firststep.ro](http://www.firststep.ro). (For more information on the cookie policy you can access the Cookie Policy available on the website [www.firststep.ro](http://www.firststep.ro) )

#### **B. Personal data processed by the empowered data processors - THE SCHOOLS**

The Data Controller empowers the School belonging to Lumina Group from Romania and Moldavia as the data processors to also process the following personal data in its name and on its behalf in connection with the *FirStep Project Competition*: name, e-mail, school, class, project title, project name, project supervisor, Youtube link (students explaining the project in a Youtube video), Google site link for digital portfolio, abstract, project files including photos, videos, diaries, research, data reports, etc. depending on each specific project.

#### **4. Data processing. Processing purpose. Legal ground**

The operator processes the personal data through the following **operations**: collecting, recording, organizing, storing, modifying, extracting, consulting, using, transmitting, combining, blocking, restricting, deleting, destroying, archiving personal data.

The Operator's **purposes** of the data processing are:

- ✓ for the student's registration to the Competition;
- ✓ for correspondence;
- ✓ for organising the online presentation and evaluation over a video conference system
- ✓ for announcing the results and preparing the awards ceremony
- ✓ For the delivery of the awards
- ✓ For the promotion of the competition if the data subject has chosen to do so
- ✓ informative purposes, through the means of communication (eg e-mail, mail), performed by the Operator in the interest of the data subject or to protect his vital interests, regarding: the terms and conditions of the Competition and other information regarding the services of the Operator, as the case may be, etc.;
- ✓ carrying out economic, financial and / or administrative management activities within the Operator, including administering the timetable, administering the internal and public examinations and competition;
- ✓ providing support services for your requests (eg handling of requests, complaints and petitions), both in physical locations and through the means of communication (eg telephone, e-mail, mail);
- ✓ analysis of the preferences, interests, history of the contractual relations for performing direct marketing activities (eg, communication by any means - mail, telephone, fax, e-mail, SMS/MMS) if the data subject has chosen these options, or to perform any other types of promotion of the Operator's services, according to the option expressed by you;
- ✓ carrying out general marketing or advertising activities, as well as activities for building consumer loyalty (eg experience exchange sessions, events, etc.) if the data subject has opted for this purpose;
- ✓ analyzing the online behavior of the data subject / any person who accesses the Operator's website on [www.firststep.ro](http://www.firststep.ro) by using cookies, both of the Operator and of the Operator's contractual partners, according to the *Cookie Policy*
- ✓ conducting internal analysis (including statistical analysis) to improve and develop the activity, as well as conducting studies and analysis regarding the services and activities performed by the Operator for their improvement;
- ✓ generating reports on the Operator's activity, in order to facilitate the management of all the operational processes;

- ✓ archiving both in paper and electronic format the documents that are concluded regarding the relationship with the data subject, the performing of a registration service regarding the documents / envelopes / packages that are addressed to the Operator in regard the Competitor,
- ✓ settling disputes, investigations or any other petitions / complaints to which the Operator is a party, including claim recovery
- ✓ to collaborate with the partner entities of the Operator who organize or participate in the organization of national and / or international school competitions, in order to ensure a competitive educational framework and to encourage the students' interest in studying and special academic performances, for a wide recognition of the academic performances;
- ✓ for filling in and for sending all registers required by the Ministry of Education or county school inspectorate;
- ✓ for the evaluation of the student's project and for prize awarding.

The **purposes** of the data processing of the empowered processor Schools part of Lumina Group from Romania and Moldavia:

- ✓ for the student's registration to the competition
- ✓ for correspondence via e-mail
- ✓ for organising the online presentation and evaluation over a video conference system
- ✓ for announcing the results and preparing the awards ceremony
- ✓ for the delivery of the awards
- ✓ for the promotion of the competition

The OPERATOR processes the personal data for the purposes mentioned above, based on the following **legal grounds**:

- (1) based on the consent granted by selecting the communication options (art. 6 letter a) of the GDPR);
- (2) to execute a contract concluded with you or to carry out activities at your request before entering into a contract (eg providing pre-contractual information);
- (3) based on a legal obligation incumbent on the Operator (your identification, keeping the accounting records, legal reports to the authorities, etc.);
- (4) based on the legitimate interest of the Operator (centralizing operations and maintaining an internal database, analyzing ideas for improving the way the Operator operates; performing statistical analyzes on the Operator's activity and students; carrying out current operations for performing the activity; development and improvement of the Operator's services; ensuring a high level of security both at the level of information systems such as applications, network, infrastructure, web page, and within physical locations - headquarters, working point, etc.)
- (5) protecting the vital interests of the data subject or of other persons;
- (6) considering that the Operator offers educational services considered to be services of public interest, in accordance with the applicable provisions, the data processing operations performed for educational purposes will have as legal basis for processing, carrying out a task of public interest.

#### **5. The OPERATOR may transfer personal data to certain recipients**

The data recipients may be:

- (1) service providers necessary for the Operator's activity, such as: IT service providers (maintenance, software development), courier services, audit services, legal services;
- (2) judicial executors, evaluating experts and notary offices, judicial bodies in Romania and other countries, such as the members of the courts, the arbitration courts, the prosecutor's offices, the police, as the case may be;
- (3) public institutions for the supervision of the activity; central and local public authorities (eg Ministry of Education and agencies subordinated to the ministry, National Authority for Tax Administration, National Office for Preventing and Combating Money Laundering, National Authority for Consumer Protection) in Romania and other countries, as appropriate;
- (4) cyber security incident investigation and support institutions.

Other recipients of personal data will be the ones mentioned in the Annex: List of personal data recipients, as the case may be.

#### **6. Information on personal data transfer to a country outside the Economic European Area**

**In general, the OPERATOR** does not transfer personal data of the data subjects through this information outside Romania or to the states within the EU/EEA.

In order to fulfill the aforementioned purposes, it is possible for the Operator to transfer some or all categories of personal data outside Romania or within the EU/EEA states. For such transfers, the Operator undertakes to take a series of legal measures to ensure an adequate level of protection of the natural persons, similar to the one provided by the European legislation. These measures include the conclusion of standard contractual clauses approved at European level.

## **7. Personal data storage**

The personal data will be **processed** for the duration required for the performance of the Competitional obligations by any of the parties, the personal data will be kept for a maximum period of 60 months (for verification and improvement of future competitions) from the date the Competition is ended.

Personal data will be **stored** for the period of time required for the purposes mentioned above or for the period of time provided by the general legal provisions as well as those applicable in tax matters and in accordance with the legislation in the archiving field.

The data collected through the cookies modules whose duration of storage is provided in the *Cookies Policy*, as the case may be

## **8. The rights you have with respect to your personal data processed by the Operator**

***The processing of the personal data requested by the Operator in the registration / pre-registration forms that are not indicated as optional, is considered mandatory for the student's participation in the competition. Your refusal to provide such data or the exercise of certain rights may cause the Operator to be unable to provide such services, including providing you with information that may be particularly important to protect your legitimate and / or vital interests (eg modifications of the schedule, modifications in the Competition profile, events that influence or can significantly influence the competition activities etc.)***

***Your refusal to provide the following data may cause the impossibility to participate in the Competition:***

name, e-mail, school, class, project title, project name, project supervisor, Youtube link (students explaining the the project in a Youtube video), Google site link for digital portfolio, abstract, project files including photos, videos, diaries, research, data reports, etc. depending on each specific project.

***The rights you have in regard to your personal data:***

***(1) The right of access to personal data*** - you can obtain from us a confirmation of whether or not the Operator processes personal data concerning you and what data is being processed.

***(2) The right to rectification*** - you may request the rectification or updating of inaccurate or incomplete personal data.

***(3) The right to delete data or the „right to be forgotten“*** - you may request the deletion of personal data concerning you, in certain cases, such as (i) personal data that are no longer necessary for the purposes for which they were collected or processed, (ii) if your data has been processed illegally, (iii) the data processing has been made based on your consent, and it has been withdrawn.

***(4) The right to withdraw your consent*** - The consent may be withdrawn at any time, when the processing of personal data concerning you has been carried out on the basis of your consent. As a general rule, if the consent is withdrawn, all data processing operations that were based on consent and took place before the withdrawal of consent - and in accordance with the GDPR -remain lawful. However, Lumina Educational Institutions will stop the processing actions concerned if possible and **the student's participation in the FirSTep Project Competition will NO longer be possible.**

***(5) The right to restrict the processing*** - you may request the restriction of the processing of personal data concerning you, in certain circumstances, such as (i) you dispute the accuracy of the data, during the period that would allow us to verify the accuracy of that data, (ii) your data has been processed illegally, and you oppose to the deletion of that data, asking to restrict their use.

***(6) The right to data portability*** - you can request and receive the personal data concerning you and that you have provided to us, with the right to transmit them to another Operator, if the data processing has been carried out either on the basis of your consent or the agreement concluded with us, and the processing of your personal data was done by automatic means. This right can be exercised, only to the extent that the processing of the data provided has been performed exclusively by automatic , means and only where the extraction of such data is feasible in terms of the technical capabilities used by the Operator at the time of the request.

***(7) The right to opposition*** - you can oppose, for reasons related to the particular situation you are in, to the processing of personal data in certain circumstances, such as (i) the processing has been carried out in our legitimate interest or (ii) the processing has the purpose of direct marketing, including the creation of profiles based on those provisions.

***(8) The right to not be the subject of a decision based solely on the automatic processing of your data, including the creation of profiles that produce legal effects or that significantly affect you.***

If the OPERATOR will make automatic decisions regarding personal data you can (i) request and obtain human intervention regarding the respective processing, (ii) can express your point of view regarding the respective processing and (iii) challenge the decision.

***(9) The right to be notified of security breaches that have or could have an impact on personal data.***

***(10) The right to file a complaint with the Operator and / or the competent data protection authority and to bring the case to justice.***

For the exercise of these rights, as well as for further questions regarding this information or in connection with the processing by the OPERATOR of the personal data, please contact our person responsible for the protection of personal data, by e-mail at [dpo@lumina.ro](mailto:dpo@lumina.ro) or by regular mail or by written and signed request, at the Operator's address mentioned on point 1 above. Your request will be analyzed and resolved within 20 days from the date of registration.

To submit a complaint/grievance to the National Supervisory Authority for Personal Data Processing, the contact details are:

Website: <http://www.dataprotection.ro/>

Email: [anspdcpc@dataprotection.ro](mailto:anspdcpc@dataprotection.ro)

Address: B-dul G-ral. Gheorghe Magheru 28-30, Sector 1, postal code 010336, Bucharest, Romania

Landline: + 40.318.059.211, + 40.318.059.212

President's Office +40.318.059.220; Fax + 40.318.059.60

**Notes:**

We will establish technical and organizational measures to protect and ensure the confidentiality, integrity and accessibility of the personal data processed, we will prevent the unauthorized use or access as well as the breach of the security of the personal data, in accordance with the legislation in force.

If data processing is required for other purposes, we will ask for your consent.

**Should any of your data change, please inform us in writing to keep the records updated.**

**If you provide us with information or personal data about other persons, you will have the obligation to inform the respective persons about the contents of this informative note.**

**Annex 1 - List of recipients of personal data**

**The operator discloses your personal data to the following entities, for the purposes listed in Annex 1 below:**

**Annex 1 - List of recipients of personal data**

<b>Nr. crt./ No.</b>	<b>Date / Data</b>	<b>Scopuri / Purposes</b>	<b>Operatori Destinatari / Recipient Operators</b>
1.	E.g. last name, first name, email, IP, user, data resulting from video recordings, signature, digital signature (if applicable);	Your identification through the means of communication, ensuring a good operability and security of IT systems. Providing support services for you (e.g. claims, requests from you	Prestatori servicii IT Prestatori servicii IT EDUSOFT TECHNOLOGIES SRL, cu sediul în București, sector 3, Str. Balta Albina, nr. 9, Camera 408, Etaj 4, înregistrată la Oficiul Registrului Comerțului cu numărul J40/19736/2017, cod de identificare fiscală 38536988

**I hereby declare, on my own responsibility, under the sanction of forgery, that I am the parent/guardian/legal representative of the student, person under age named below.**

**I have acknowledged,**

**Date :** \_\_\_\_\_

In the name and on behalf of the student: \_\_\_\_\_ *(student's last name, first name),*

\_\_\_\_\_ *( parent's/guardian's/ legal representative's last name, first name),*

\_\_\_\_\_ *(parent's/guardian's/ legal representative's signature)*