

Privacy policy

1. Introduction

- Edkimo GmbH is based in Germany. We operate in accordance with the provisions of the EU General Data Protection Regulation (GDPR).
- We are guided by the principle of privacy-by-design.
- We only collect as much data as absolutely necessary to enable teachers and users who create online surveys to use the online feedback system with real-time results.
- We only collect data from online survey creators that is absolutely necessary to set up and use the app. These are: a username of your choice, an e-mail address, and the name and address of your school, educational institution, or organization.
- By registering an account, users agree to the processing of this data by Edkimo GmbH.
- We do not sell any data of our users to third parties.
- We store only the minimum log files necessary for technical operation and troubleshooting on our web server.
- We do not create profiles of students or survey participants.
- Our servers are located in the EU (in Germany) under applicable European data protection regulations. The app server is located at a data center of Hetzner Online AG, the homepage server at a data center of ALL-INKL.COM. Edkimo GmbH has concluded written data processing agreements with both companies.
- Communication via Edkimo is SSL-encrypted by default.
- The responsibility for the feedback data from the participants and the aggregated results lies with the creators of the survey or their school, educational institution or organization. Edkimo only provides the technical means to conduct online surveys.
- Each survey is stored as a data record on our server and can be removed at any time by the creators using the delete function. When a survey is deleted, all associated data is permanently deleted after a security question. This includes the questionnaire, the answers of the respondents as well as the results of the survey.
- When deleting an Edkimo account, all related data will be deleted from the server.

2. Terms and definitions

The scope of this Privacy Policy includes the Edkimo Feedback app, the Edkimo websites, and the Edkimo mobile apps for Android and iOS devices. These products are also collectively referred to in this Policy as the Service and Services, respectively.

The term data in this Privacy Policy refers to any data collected using our Services, primarily anonymous feedback from participants in a survey that is processed on a website we operate and the results of which are analyzed at the group level. This data is in your control.

The term personal data refers to information that we collect about you.

3. DPA in accordance with Art. 28 (3) GDPR

Our premium customers can conclude a data processing agreement with us in accordance with the requirements of Art. 28 (3) of the EU-DSGVO.

To enter into a data processing agreement with us:

1. Send us a request to privacy@edkimo.com or download the data processing agreement PDF in your Team Admin account.
2. Fill out the document.
3. Let a responsible person sign the document.
4. Send the signed document back to us at privacy@edkimo.com.

We will send you an acknowledgement of receipt upon receipt of the completed and signed document to confirm the completion of the agreement.

4. Data we collect and how we use it

Groups of users

We collect different information about you depending on how you use Edkimo. In general, there are three groups of people who use our service:

1. **Visitors to our website:** You are a “visitor” when you visit one of our websites, for example, to read articles and learn more about Edkimo.
2. **Survey creators:** You are a survey creator if you have a personal Edkimo user account and conduct your own surveys, create questionnaire templates or analyze results.
3. **Participants in a survey:** You are a participant if you have been given access to an anonymous online survey that was created using our services and is conducted via Edkimo.

Edkimo also considers “creators” and “participants” to be “visitors”, as they may visit our website, e.g. to register with Edkimo or to participate in an anonymous online survey. Under the principle privacy-by-design we process your personal data only to fulfill our contractual obligation to provide our services and to pursue legitimate interests in improving our services and further developing our products. Our main goal is to improve our services and content for all users and to ensure that your personal data is respected and protected.

Under the principle of data avoidance and data minimization (privacy-by-design), we process personal data about you only to fulfill our contractual obligation to provide our services and to pursue legitimate interests in improving our services and further developing our products. Our main goal is to improve our services and content for all users and to ensure that your personal data is respected and protected.

4.1 Visitors

Usage data

We only collect anonymized usage data using the EU-based, privacy-friendly open source web analytics software plausible.io. Plausible works completely without cookies and does not store any personal data. The IP address is used briefly to roughly capture the country of origin (e.g. Germany), then discarded and never stored in the database. This gives us basic, anonymous information about which websites you visit, which country you come from, and which device you use. We use this anonymous information to continuously improve our websites and services for you and all other visitors. You can also turn off this anonymous tracking at any time.

Device and Browser Data

We collect information about the device and application you use to access our Services. Device data primarily means the version of your operating system, device type, system and performance information, and browser type. We use this information to improve our websites and services for you and all other users.

Contact Information

You may provide us with your contact information, such as email address or phone number. This may be through a form on our website, via email, through interaction with our customer support team, or in a response to one of our own Edkimo surveys. We use this contact information to respond to inquiries from you, to send you information as part of our service, and to send you a quote or invoice if you request it.

Log files

Furthermore, our servers store only the minimum information necessary for technical operation and troubleshooting. These log files contain information such as operating system version, device type and timestamp.

In particular, we use log data for the following purposes:

- Monitoring server load
- Detecting and preventing misuse and hacker attacks
- Error correction and error detection.

All log files are deleted after 14 days at the latest.

Referral data

If you arrived at Edkimo through an external referral, such as a link on another website, an advertisement, a search engine, or an email referral, we store information about the source that brought you to Edkimo. We use this referral data to increase the success of our integrations, campaigns, and search engine optimization.

Legally Required Uses

In order to respond to legally relevant requests or to prevent fraud, we may need to use and disclose information or data about you. In the event that we receive a court subpoena or other legally relevant request, we may need to examine stored data in order to respond adequately.

4.2 Creators

The information we collect about visitors also applies to creators, as they visit our websites to log in to Edkimo, register or contact us. We also process the following information about creators:

Registration data

You need an Edkimo account with personal access data before you can create a survey. When you create an account, we collect only a user name of your choice, your email address, and the name and address of your school, educational institution, or organization.



If you register using a third-party account (e.g., via a single sign-on solution from other providers and as part of cooperation agreements in different regions or states), the following applies: We also use third-party data in this context. The goal is to allow you to authenticate and log in to our service via a third-party integration.

Billing data

If you request a quote or make a payment to Edkimo, we need your billing-related data such as billing address and email address of the contact person.

Survey data

We store survey data (questions and responses) for you and make it available for further analysis.

Account information

We use your account information such as your email address, pseudonymous username, and association with a school, educational institution, or organization to manage your Edkimo account, e.g., so that you can reset your password and for customer support. We will occasionally send you business-related communications about our services, quotes and invoices, changes in our services or policies, and a welcome email when you first register with Edkimo. You cannot opt out of receiving these communications as they are essential to the delivery of our services.

Legally Required Uses

In order to respond to legally relevant requests or to prevent fraud, we may need to use and disclose information or data about you. In the event we receive a court subpoena or other legally relevant request, we may need to examine stored data in order to respond adequately

4.3 Participants

The information we collect about visitors also applies to participants, since they can also access a survey via our website by entering a feedback code or TAN, or are redirected to our website after participating and are then treated as visitors.

Data minimization and data avoidance

No personal registration of participants is necessary or intended for participation in an online survey via Edkimo.

Use of feedback from participants

Feedback from participants collected via Edkimo as part of feedback and evaluation processes is managed by survey creators. The creator is usually the person who has sent or provided the participants with the access data for the survey. Edkimo processes these participant responses only on behalf of the creators.

Data controller

Any personal feedback collected from participants is controlled and monitored exclusively by the survey creators. Edkimo only processes this data on behalf of the responsible creator. If you have any questions, please contact the person who created the survey.

5. Information provided for all accounts

Our services also allow creators to publish questionnaire links and result links on the internet and share them with other people. Shared content made available online can also be found by search engines. Edkimo has no influence on the display of search results. Therefore, please use the functionalities for sharing and publishing data and information with caution.

6. Information provided for premium accounts

If your Edkimo account belongs to an Edkimo premium account, your email address and pseudonymous username are usually also visible in a list for a qualified team admin person within your school/organization.

Your self-created questionnaire templates and the results of your surveys are not initially visible to others. This data is in your hands.

However, you can make this data accessible to other people or a team admin. To do so, however, you must have explicitly released your survey or the results beforehand. We will not share your information or data with any third party outside the strict limits of the circumstances described here.

7. Subcontractors

We use subcontractors and trusted partners to assist us in providing certain aspects of our services. Edkimo has entered into the necessary agreements within the meaning of Article 28(4) of the GDPR with the following sub-processors that process personal data to ensure that they meet our high data protection standards:

- Hetzner Online AG (Software, Server, Database)
- ALL-INKL.COM (Homepage, E-Mail-Provider)
- Postmark (Transactional mails)
- Brevo (Newsletter)
- Plausible.io (Analytics)
- Lexoffice.de (Billing)
- Samdock (CRM)
- Berlin Recycling (File destruction)

Edkimo is self-explanatory and can be used entirely in the browser of your computer, tablet or smartphone. Optionally, we also provide explainer videos and mobile apps for smartphones and tablets using the following providers:

- You can watch Edkimo explainer videos on Vimeo. You can find Vimeo's privacy policy [here](#).
- You can optionally download the Edkimo Android app from the Play Store. Google's privacy policy can be found [here](#).
- You can optionally download the Edkimo iOS app from the App Store. Apple's privacy policy can be found [here](#).

8. Data retention and deletion

To the extent that you maintain an Edkimo account, we do not delete data contained therein, which means that you are responsible for, and can determine, how long you retain this data. Your account provides many controls to delete individual surveys, individual templates, or your entire account. If you are a participant, you must check with the person who created the survey to determine how long your responses will be stored in Edkimo Services.

9. Safety of minors

Edkimo does not profile students. We do not allow them to register personally for our services. If we become aware that we have collected the personal information of a minor, we may delete that information without further notice. If you believe this is the case, please contact our support team.

10. Changes to the privacy policy

Edkimo may occasionally make changes to this Privacy Policy. In cases where such a change fundamentally alters the way we collect or use your personal information or data, we will send a notice of the change to all account holders.

11. Your rights

You may exercise the right – particularly if you are a European user – to obtain information about whether we hold personal data about you, to access the personal data we hold about you and, in appropriate circumstances, to request that we correct, update, amend or delete it. Certain exceptions or limitations may apply to some of these rights.

We will respond to your request to exercise these rights within a reasonable time, but no later than 30 days of receipt.

You have the following rights:

- Data Access Rights
- Right to restrict processing
- Right to rectification
- Right to erasure (the “right to be forgotten”)
- Right to object to processing
- Right to withdraw consent
- Right to lodge a complaint with a supervisory authority
- Data portability rights

Rights as creator

If you have a personal Edkimo account, you are entitled to a copy of all personal data we have stored about you. Furthermore, you are entitled to demand a restriction of our use of your data or to object to the handling of your data by us in partial areas. You can already access a large part of your data after logging into your account. However, if you would like to receive a complete copy of all data or request a restriction or limitation of our use of your data, please contact our support team.

Rights as a participant

If you have already completed a survey using Edkimo that was sent to you by a survey creator, you will need to contact that person or organization directly about managing, deleting, restricting access to, or otherwise withdrawing consent for any other use that you have granted to that person or organization in your responses.

Your responses are not the responsibility of Edkimo. As a result, we cannot process such requests related to this data.

If you have difficulty identifying the person responsible for creating the survey, you can contact our support team.

Rights as a visitor

If you have visited our website and would like to exercise the above rights, please contact our support team to review your request.

12. Contact for exercising your rights

Our contact for privacy inquiries:

Edkimo GmbH
– Data Protection Officer –
Hauptstr. 37
10827 Berlin
Germany
privacy@edkimo.com