

PRIVACY POLICY

PR1 GIFTED Serious Game

1. Introduction

This Privacy Policy describes how the GIFTED Serious Game platform (the "Platform") collects, processes, and protects user data. The Platform is developed as part of the Erasmus+ GIFTED project and complies with the General Data Protection Regulation (GDPR) and applicable EU data protection laws. By using the Platform, you acknowledge that you have read and understood this Privacy Policy. Continued use of the Platform constitutes your acceptance of this Privacy Policy and its terms. Significant changes to this Privacy Policy will be communicated via the Platform, and users are encouraged to review updates periodically.

For any inquiries regarding data protection, you can contact us at: gifted@noahealth.it.

2. Data Controller & Contact Information

The data controller responsible for processing personal data under this Privacy Policy is:

GIFTED Project Consortium

Email: gifted@noahealth.it

3. What Data We Collect

The Platform collects and processes the following data:

- **Student Data (Anonymized):** Students are registered using alphanumeric codes to ensure anonymity. The system collects demographic details, including **gender, nationality, and date of birth**, as well as game performance data (e.g., responses to mathematical tasks and response times).
- **Educator/Admin Data:** When registering, educators and administrators may provide personal data, including **name, email address, role, and school affiliation**.
- **Usage & Log Data:** We may collect anonymized usage statistics to improve the functionality and performance of the Platform.

The data is **never used for commercial purposes** and remains within the educational and research scope of the GIFTED project. Data may be shared with external academic research institutions or third-party collaborators strictly for research purposes, provided they comply with GDPR and maintain anonymization standards.

4. How We Use Your Data

The collected data is processed solely for the following purposes:

- **Educational & Research Purposes:** To analyze gameplay performance, improve the educational effectiveness of the Platform, and contribute to academic research on gifted education.
- **Platform Optimization:** To enhance user experience and address technical improvements.
- **Compliance & Ethical Considerations:** The data processing follows ethical guidelines reviewed by an institutional ethical committee.

All research-related data is **aggregated and anonymized** before publication or dissemination.

5. Legal Basis for Processing

The legal basis for processing personal data under **Article 6(1) of Regulation (EU) 2016/679 (General Data Protection Regulation - GDPR)** includes:

- **Legitimate Interest:** Data is collected for **educational and research purposes** as part of the GIFTED Erasmus+ project.
- **Consent:** Where applicable, schools and educators must obtain parental/legal guardian consent before registering students. In specific cases, explicit consent may be required, such as when

processing special categories of personal data under **Article 9(2) of Regulation (EU) 2016/679 (General Data Protection Regulation - GDPR)**, or if personal data is used beyond the stated educational and research purposes.

6. How Data is Stored & Secured

The Platform ensures **strict security measures** to protect collected data:

- **Data is stored on secure servers located within the European Union (EU).**
- **Access is restricted** to authorized research personnel and system administrators.
- **Encryption and anonymization** techniques are applied to safeguard user information.

We continuously monitor and update security protocols to align with EU data protection standards. Security measures include **encryption of stored data, role-based access control, regular security audits, and compliance with industry best practices to prevent unauthorized access or data breaches**. In addition, independent third-party security audits and external compliance checks are conducted at least annually to ensure ongoing adherence to data protection regulations.

7. Data Sharing & Third-Party Involvement

- **Data is NOT sold, rented, or shared with commercial third parties.**
- **Access to collected data is strictly limited** to the GIFTED project consortium members involved in research and platform maintenance.
- **Aggregated, anonymized data may be used for scientific publications** and project dissemination, ensuring compliance with GDPR and ethical research standards. If anonymized data is shared outside the EU, it will be transferred in accordance with GDPR safeguards, such as Standard Contractual Clauses (SCCs) or equivalent legal mechanisms.

8. User Rights Under GDPR

Users have the following rights under GDPR regarding their data:

- **Right of Access:** Users can request information on how their data is processed.
- **Right to Rectification:** If applicable, educators may request corrections to their registration data.
- **Right to Erasure:** Since student data is anonymized, it is not possible to identify or delete specific student data. Users who do not wish to participate in future data collection may request account deletion, which will prevent further data processing under their credentials. However, users may request account deletion.
- **Right to Restriction & Objection:** Since student data is anonymized at the platform level, it is not possible to identify or delete specific student data. Account deletion does not retroactively remove already collected anonymized data used for research purposes. Only educators and school administrators have access to identifiable student information. The Platform itself does not store personally identifiable student data, ensuring privacy-by-design compliance. Users who do not wish to participate in future data collection may request account deletion (applicable only to educator/admin accounts), which will prevent further data processing under their credentials.

To exercise any of these rights, contact gifted@noahealth.it.

9. Data Retention Policy

- **Student gameplay data (anonymized)** is retained for research purposes for up to **5 years**. After this period, research data will either be securely deleted or archived in an aggregated format that does not allow individual identification.
- **Educator/admin registration data** is retained for the duration of the project and deleted **upon request**.
- **Inactive accounts may be deleted** after a period of **36 months** of inactivity in accordance with project policies. Users will receive a notification via email at least 30 days before their account is scheduled for deletion, providing them with the opportunity to reactivate their account if desired.

10. Changes to this Privacy Policy

This Privacy Policy may be updated periodically to reflect legal or operational changes. Any modifications Any modifications will be communicated via email to all registered users, since the Platform does not support automated notifications.

11. Contact Information for Privacy Concerns

For any questions or privacy-related concerns, please contact:

GIFTED Project Consortium

Email: gifted@noahealth.it

By using the Platform, you confirm that you have read and understood this Privacy Policy and agree to the processing of your data as described.

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