# PREPONA Sistemas de Testagem e Avaliação S.A. PRIVACY NOTICE

#### Introduction

Prepona Sistemas de Testagem e Avaliação S.A. (**Prepona**) is an e-Assessment platform that delivers Internet-Based Tests (IBT) and Computer-Based Tests (CBT) on behalf of a variety of third-party certifying bodies, government agencies and academic institutions (**Exam Entities**). We also work in conjunction with different partners who use our platform to manage candidate registration, payments, test booking, test result and digital certificate production, as well as the day-to-day operations of different test-centre networks (**Operational Partners**). As well as **Exam Entities** and **Operational Partners**, our platform may also be used by third-party providers of test content (**Content Partners**). In this Privacy Notice we refer to all these partners as **Principal Partners**.

Consequently, we at **Prepona** recognise the importance of protecting the privacy of personally identifying information and believe that the use and sharing of it is important for us to serve your assessment or professional certification needs and those of our **Principal Partners**.

This notice is in compliance with the Brazilian General Data Protection Law (LGPD) or Law nº 13.709, implemented on 14 August 2018, as well as with GDPR and CCPA, and aims to explain how **Prepona** uses, maintains, shares, and protects your information when you use our e-Assessment platform. Please check our Privacy Policy on this homepage, as well as the privacy policies of our **Principal Partners** in order to clear up any doubts you may have. Please remember **Prepona** does not control the privacy policies or practices of these websites and accepts no responsibility whatever for the content or practices of such websites.

#### **Retention of Information**

Prepona will retain your information for as long as is necessary to fulfil any of the uses identified in this privacy policy or to comply with applicable legal, regulatory, or court orders. It may therefore be important to share information with those who have a legitimate reason to use it, including courts of law and government agencies.

#### Security and Confidentiality

We believe in protecting the all personal information provided by you through the use of reasonable administrative, physical and technical safeguards. We use secure sockets layer (SSL) transmission, as well as agreed protocols for establishing a secure connection for transmitting this information as required by any of our **Principal Partners** of courts of law. We

also have security protocols and measures in place to protect your personal information from unauthorized access, alteration, and unlawful disclosure.

## The following applies specifically to certification exam Candidates and professional or academic Test Takers:

#### Information Prepona Collects on Registration and during the Post-Test Survey

Personal information that can identify you – such as your name and address, official identification number or social security number, and photographs even – may be either required or requested on registration, or when answering a post-test survey as normally determined by our **Principal Partners**.

If, during registration, you do not provide the information as required, you will not be able to proceed.

# Use of Your Personally Identifying Information either by Prepona or Principal Partners

This information may be used to:

- Communicate with you regarding exams or assessments, booked, changed or cancelled at some point.
- Maintain your account, verify your identity, process payments, and resolve any payment issues.
- Carry out research and analysis consistent with the policies of either **Prepona** or its **Principal Partners**.
- Provide information to government, corporate or academic entities who have either sponsored your assessments or certification exams or are some way closely involved in such programmes co-certifying exams, for example.

## The following applies specifically to Users who work for or with, or who have been appointed by, Prepona or any of our Principal Partners:

Prepona and Principal Partner Users include, but are not limited to:

- Prepona officers, employees or agents
- Platform and Web-based Module Administrators (registered by Prepona)
- Test content providers
- Appeals managers and judges
- Essay reader/examiners, mediators and supervisors
- Oral evaluation examiners and observers, mediators, and supervisors
- Test centre software administrators, IT staff and proctors
- Sales staff
- Administration staff
- Financial staff
- Internal and external auditors

Such personally identifying information given by you during registration will be used for the same purposes as for **Candidates** and **Test Takers** and given the same protection. However, our **Principal Partners** will also have immediate access to this information for the purposes of effective and efficient management.

### Storage of data

Any personal data that we hold about you will be stored on our servers and, in the circumstances described above, on the servers of our **Principal Partners**.

## Your rights in relation to your personal data and requests to permanently remove identifying information

If you wish to see the data that we process about you, please contact info@prepona.com. You have the right to receive the personal data that we hold about you in a structured, commonly used and machine-readable format.

If you wish, you may ask Prepona to remove all personally identifying information from our platform. If you do so, we will immediately comply with your request and inform you by replying to you request as sent to us by email. Please remember, though, such action will mean you will no longer be able to access any part of our platform, including accessing your exam results and digital certificates.

If you wish to ask us to remove all your personally identifying information, please send your request to info@prepona.com.

If you have a concern or complaint in relation to our processing of your personal data, please contact info@prepona.com.

#### **Children's Privacy**

Our platform is intended for use by people over the age of 16. It is not intended to be used by children or teenagers under the age of 16, unless such age restriction is waived by one of our **Principal Partners**. If you are under the age of 16, please do not use this platform unless there is such a waiver for the certification exam or assessment you wish to register for.

Version 1.0.1 Updated: 04/2021