

Personal Data Controller's Instruction for the processing of Personal Data

In addition to what is already stipulated in the Personal Data Processor Agreement, that Personal Data Processor shall also follow the instructions set out below:

1. Purposes, object and type
All personal data in the system exists for the purpose of testing and evaluation of the learning platform, Grow Planet. The information is stored within the EU, in Ireland.
2. The processing involves the following types of Personal Data
<p>Personal data in the system consists of, regarding students:</p> <p>First and last name Class and school Login code for the game Grow Planet</p> <p>Personal data in the system consists of, regarding teachers / employees:</p> <p>User name First and last name Password Email address and phone number Class / classes and school / schools</p>
3. The Processing shall include the following categories of Registered Persons:
<p>Class teachers / employees Students</p>
4. Specify special security processing requirements that will apply to the Processing of Personal Data that is carried out by the Personal Data Processor(s)
<p>Personal data shall be deleted after the end of the test period, unless the Personal Data Controller and the Personal Data Processor agree otherwise.</p> <p>Backups may not be stored for more than 3 months.</p>
5. Specify technical and organizational security measures that apply to the Processing of Personal Data by Personal Data Processor(s)
The Personal Data Processor must meet the requirements specified on the basis of the Personal Data Controller's information classification and report the status of these on request.
6. Specify special requirements relating to Logs that apply to the Processing of Personal Data, as well as who will be having access to these.
<p>Logs shall state: History of students' and teachers' use of the service during the trial period.</p> <p>Only staff at Gro Play have access to data / history from the trials.</p>
7. Localization and transferring to Personal Data to a Third Country

No subcontractors in countries outside the EU.

8. Other Instructions regarding the Processing of Personal Data performed by Personal Data Processor(s)

N/A

Version management

Version	Date	Changes	Decision-maker(s)
1	18 December 2018	Group PDPA (SKL, Kommentus and Inera)	MN, PR, FL, MC, UL, HA, AO
1.2	25 October 2019	Deducted the 'Template for list of Processor Subcontractors at the time of the signing of the PDPA'	PR