

Privacy Policy

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1. Introduction

MyStudent ("we", "us", "our", "Company") operates the MyStudent mobile application (the "App", "Service"). This Privacy Policy explains how we collect, use, process, store, share, and protect your personal data in accordance with the General Data Protection Regulation (EU) 2016/679 ("GDPR"), the Luxembourg Law of 1 August 2018 on the organisation of the Commission nationale pour la protection des données et du droit à la protection des données ("Luxembourg Data Protection Law"), and other applicable data protection legislation.

We are committed to processing your data lawfully, fairly, and transparently. This Privacy Policy should be read together with our Terms and Conditions. By using the Service, you acknowledge that you have read and understood this Privacy Policy.

2. Data Controller

The data controller responsible for the processing of your personal data is:

MyStudent
Grand Duchy of Luxembourg
Email: info@my-student.lu

For any data protection inquiries, you may contact us at the email address above. You also have the right to lodge a complaint with the Commission nationale pour la protection des données (CNPd), the Luxembourg supervisory authority, at www.cnpd.public.lu.

3. Personal Data We Collect

3.1 Data You Provide Directly

Data Category	Specific Data	Purpose
Account Data	Email address, first name, last name, password (hashed)	Account creation, authentication, identification, and communication
Academic Data	Grades, exam scores, marks, max marks, bonus points, percentage contributions, subject names, coefficients, academic year/term information	Providing the core grade tracking and calculation service
Preferences	Selected year, term, subject, cookie consent choice	Personalizing your experience and remembering your settings

3.2 Data Collected Automatically

Data Category	Specific Data	Purpose
Device & Technical Data	Device type, operating system, app version, IP address, browser type	Service delivery, security, troubleshooting, and analytics

Data Category	Specific Data	Purpose
Usage Data	Features accessed, frequency of use, interaction patterns, session duration, navigation paths	Improving the Service, understanding user behavior, and product development
Analytics Data	Firebase Analytics data (when cookies accepted): events, screen views, user engagement metrics	Statistical analysis, product improvement, and understanding user needs
Log Data	Server logs, error reports, access timestamps, API call metadata	Debugging, security monitoring, and service maintenance

3.3 Data From Third Parties

We may receive information about you from third-party services we integrate with, such as Firebase Authentication and Analytics. In the future, we may also receive data from educational institutions, partner services, or public databases to enhance the Service.

4. Legal Bases for Processing (Article 6 GDPR)

We process your personal data on the following legal bases, to the maximum extent permitted under the GDPR and Luxembourg Data Protection Law:

Legal Basis	Processing Activities
Contract Performance (Art. 6(1)(b) GDPR)	Providing and maintaining the Service; managing your account; processing your academic data for grade tracking and calculations; email verification; password management; account deletion; customer support
Legitimate Interests (Art. 6(1)(f) GDPR)	Improving and optimizing the Service; conducting analytics and statistical analysis on usage patterns; developing new features and products; ensuring security and preventing fraud; creating anonymized and aggregated datasets for research and benchmarking; understanding how users interact with the Service; internal administrative purposes; direct marketing of our own similar products and services (where permitted)
Consent (Art. 6(1)(a) GDPR)	Firebase Analytics and cookies; promotional email communications; any future processing activities that require your specific consent. You may withdraw consent at any time without affecting the lawfulness of processing based on consent before its withdrawal.
Legal Obligation (Art. 6(1)(c) GDPR)	Compliance with applicable laws and regulations; responding to lawful requests from public authorities; maintaining records as required by law; tax and accounting obligations

Legitimate Interest Assessment: Where we rely on legitimate interests, we have conducted a balancing test to ensure that our interests do not override your fundamental rights and freedoms. We consider the nature and purpose of the processing, the potential impact on you, and whether we can achieve the same result through less intrusive means. You have the right to object to processing based on legitimate interests at any time (see Section 9).

5. How We Use Your Data

We use your personal data for the following purposes:

- **Service Delivery:** Operating, maintaining, and providing the core features of MyStudent, including grade tracking, calculations, and academic data management
- **Personalization:** Customizing your experience, remembering your preferences, and providing tailored content, recommendations, and features based on your usage patterns
- **Analytics and Research:** Analyzing usage data, conducting statistical analysis, and performing research to understand user behavior, improve the Service, and develop new features

- **Product Development:** Using insights from aggregated and anonymized data to design, develop, and test new products, services, and features
- **Communication:** Sending transactional emails (verification, password resets, security alerts), service updates, and promotional communications about MyStudent products and services
- **Security:** Detecting, preventing, and investigating security incidents, fraud, abuse, and violations of our Terms
- **Legal Compliance:** Meeting legal obligations, responding to lawful requests, and exercising or defending legal claims
- **Aggregated Data:** Creating anonymized and aggregated datasets derived from your data for internal analytics, external research, educational insights, benchmarking, machine learning model training, and other lawful purposes

6. Data Sharing and Disclosure

We may share your personal data with the following categories of recipients, to the maximum extent permitted under the GDPR:

6.1 Service Providers and Processors

We engage third-party service providers who process data on our behalf under data processing agreements compliant with Article 28 GDPR. Currently, these include:

- **Google Firebase:** Cloud infrastructure (Firestore database, Authentication, Cloud Functions, Storage, Hosting, Analytics) — data stored in the EU (europe-west1 region)
- **Apple:** App distribution via the App Store; future in-app purchase processing

6.2 Other Disclosures

We may also disclose your data in the following circumstances:

- **Legal Requirements:** When required by law, regulation, legal process, or governmental request
- **Safety and Rights:** To protect the rights, property, or safety of MyStudent, our users, or the public
- **Business Transfers:** In connection with a merger, acquisition, reorganization, sale of assets, or similar transaction, your data may be transferred to the acquiring entity
- **With Your Consent:** When you have given explicit consent to share your data with specific third parties
- **Aggregated/Anonymized Data:** We may share anonymized or aggregated data with third parties, including research institutions, educational organizations, partners, and other entities for analytics, research, and benchmarking purposes. Such data does not identify you personally.

7. International Data Transfers

Your personal data is primarily stored and processed within the European Union/European Economic Area (EU/EEA), specifically in Google Cloud's europe-west1 region (Belgium). However, some of our service providers (such as Google LLC) may process data outside the EU/EEA.

Where personal data is transferred outside the EU/EEA, we ensure that appropriate safeguards are in place in accordance with Chapter V of the GDPR, including: adequacy decisions by the European Commission (Art. 45 GDPR), Standard Contractual Clauses approved by the European Commission (Art. 46(2)(c) GDPR), or other valid transfer mechanisms. Google LLC relies on Standard Contractual Clauses and the EU-U.S. Data Privacy Framework for international transfers.

8. Data Retention

We retain your personal data only for as long as necessary to fulfill the purposes for which it was collected, or as required by applicable law. Our general retention practices are:

Data Type	Retention Period	Justification
Account Data	Duration of your account + 3 years after deletion	Contract performance; legitimate interest in resolving disputes; legal obligations
Academic Data	Duration of your account; deleted upon account deletion request	Contract performance
Usage & Analytics Data	Up to 26 months from collection (or as configured in Firebase Analytics)	Legitimate interest in product improvement
Log Data	Up to 12 months	Legitimate interest in security and debugging
Anonymized/Aggregated Data	Indefinitely	Once truly anonymized, data is no longer personal data under GDPR and may be retained without time limit

When you delete your account through the App, we initiate removal of your personal data from our active systems, including your Firestore profile, academic data, and stored files. Some data may persist in backups for a limited period and will be purged in accordance with our backup rotation schedules.

9. Your Rights Under GDPR

Under the GDPR and Luxembourg Data Protection Law, you have the following rights regarding your personal data. To exercise any of these rights, contact us at info@my-student.lu. We will respond within 30 days (extendable by 60 days for complex requests).

- **Right of Access (Art. 15):** You have the right to request a copy of the personal data we hold about you and information about how it is processed.
- **Right to Rectification (Art. 16):** You have the right to request correction of any inaccurate or incomplete personal data.
- **Right to Erasure (Art. 17):** You have the right to request deletion of your personal data. You can exercise this right through the account deletion feature in the App, which triggers a cascading deletion of your profile, academic data, and stored files.
- **Right to Restriction (Art. 18):** You have the right to request restriction of processing of your personal data in certain circumstances.
- **Right to Data Portability (Art. 20):** You have the right to receive your personal data in a structured, commonly used, and machine-readable format.
- **Right to Object (Art. 21):** You have the right to object to processing based on legitimate interests or direct marketing at any time. We will cease processing unless we demonstrate compelling legitimate grounds.
- **Right to Withdraw Consent (Art. 7(3)):** Where processing is based on consent, you may withdraw it at any time without affecting the lawfulness of prior processing.
- **Right to Lodge a Complaint:** You have the right to lodge a complaint with the CNPD (www.cnpd.public.lu) or any other competent supervisory authority.

10. Data Security

We implement appropriate technical and organizational measures to protect your personal data against unauthorized access, alteration, disclosure, or destruction, in accordance with Article 32 GDPR. These measures include:

- Encryption of data in transit (TLS/SSL) and at rest

- Firebase Authentication with secure password hashing (bcrypt/scrypt)
- Firestore security rules ensuring users can only access their own data
- Firebase Storage security rules restricting file access to authenticated users' own directories
- Cloud Functions with authentication requirements for all sensitive operations
- EU-based data storage (europa-west1) for data residency compliance
- Regular security reviews and monitoring
- Password requirements: minimum 8 characters, rejection of common passwords

While we strive to protect your personal data, no method of electronic storage or transmission is 100% secure. We cannot guarantee absolute security of your data.

11. Cookies and Analytics

Our website uses a cookie consent mechanism. Firebase Analytics is only activated if you accept cookies. If you decline, no analytics cookies are set and Firebase Analytics data is not collected.

When enabled, Firebase Analytics collects usage data such as screen views, feature interactions, and engagement metrics. This data helps us understand how users interact with the Service and improve it. Firebase Analytics may use cookies and similar technologies for this purpose.

You can manage your cookie preferences at any time through the cookie banner on our website. For the mobile App, analytics tracking is governed by your device settings and in-app preferences.

12. Children's Privacy

MyStudent is designed for students, including those under 18. In accordance with Article 8 GDPR and Luxembourg's implementation, children under the age of 16 require parental or guardian consent to use the Service. We do not knowingly collect personal data from children under 16 without such consent.

If we become aware that we have collected personal data from a child under 16 without appropriate parental consent, we will take steps to delete such data. If you are a parent or guardian and believe your child has provided us with personal data without your consent, please contact us at info@my-student.lu.

13. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, technology, legal requirements, or other factors. We will notify you of material changes by posting the updated policy on our website and/or through the App. The 'Last Updated' date at the top of this policy indicates when the most recent changes were made.

We encourage you to review this Privacy Policy periodically. Your continued use of the Service after any changes constitutes acceptance of the updated Privacy Policy.

14. Automated Decision-Making and Profiling

Currently, we do not engage in automated decision-making that produces legal effects or similarly significantly affects you, as defined under Article 22 GDPR. Should we implement such processing in the future, we will update this Privacy Policy and provide you with appropriate information, safeguards, and the right to obtain human intervention.

We may use automated processing for analytics, personalization, and service improvement purposes based on our legitimate interests. Such processing does not have legal or similarly significant effects on you.

15. Contact Information and Supervisory Authority

For any questions, concerns, or requests regarding this Privacy Policy or our data processing practices, please contact us:

MyStudent

Email: info@my-student.lu

If you are not satisfied with our response, you have the right to lodge a complaint with the competent supervisory authority:

Commission nationale pour la protection des données (CNPD)

15, Boulevard du Jazz, L-4370 Belvaux, Luxembourg

Website: www.cnpd.public.lu

Email: info@cnpd.lu

By using MyStudent, you acknowledge that you have read and understood this Privacy Policy.