

## Privacy Policy

Privacy Policy of Atmospheric School / Atmo Grow Edu Platform

**Effective date:** December 12, 2025

**Version:** 1.0

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### 1. Who we are

This Privacy Policy explains how **Atmospheric School** and the **Atmo Grow Edu Platform** (hereinafter – “we”, “the School”, “the Platform”) collect, use, store and protect personal data of:

- students;
- parents / legal guardians;
- teachers and tutors;
- administrative staff;
- website visitors and platform users.

We work with children, including in a distance-learning format, and therefore treat the protection of personal data and privacy as seriously as the quality of education we provide.

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### 2. Scope of this Policy

This Policy applies to:

- the main website of Atmospheric School;
- the web and (if applicable) mobile versions of the Atmo Grow Edu Platform;
- related online services (e-gradebook, parent accounts, support systems);
- communication with us by email, through messengers and contact forms.

If a specific service has its own privacy notice or additional terms, they should be read together with this Policy.

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### 3. Who is the data controller

The **data controller** (the entity that determines the purposes and means of processing personal data) is:

**Atmospheric school, LLC**

Kyrylivska str. 134A, office 231, Kyiv, Ukraine

Email: [vstup@atschool.com.ua](mailto:vstup@atschool.com.ua)

Contact for ethics and data protection:

**Name:** Zakhar Symchych

**Role:** Academic Director, Ethics & Data Protection Contact

**Email:** [z.symchych@atschool.com.ua](mailto:z.symchych@atschool.com.ua)



This person is not necessarily a formal Data Protection Officer under specific legislation, but is the main point of contact for privacy and ethics questions.

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## 4. Key terms

In this Policy we use the following basic terms:

- **“Personal data”** – any information relating to an identified or identifiable natural person (for example, name, contacts, identifiers, learning results).
- **“Processing”** – any operation with personal data (collection, recording, storage, use, disclosure, deletion and so on).
- **“Controller”** – the organization that determines why and how personal data are processed.
- **“Processor”** – a service provider that processes data on behalf of the controller.
- **“Platform”** – the Atmo Grow Edu Platform and its modules used for learning, communication and administration.

Where applicable, these terms are interpreted in line with data protection laws that may apply to you (for example, the EU General Data Protection Regulation – GDPR).

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## 5. What data we collect

We collect only those data which are necessary for providing education, supporting students and fulfilling legal obligations.

### 5.1 Student data

We may process the following categories of student data:

- **Identification and contact data** – name, surname, date of birth, language of instruction, class / grade, contact details (for example, email).
- **Account data** – login, password (stored only in hashed form), internal identifiers in the platform.
- **Learning data** – enrolled courses and subjects, timetable, lesson progress, homework, tests and results, teacher feedback, certificates and reports.
- **Communication data** – messages with teachers, tutors and support team (for example, in chats or comments).
- **Technical data** – IP address, browser type, device information, approximate location by IP, log files (events in the system, authorization, errors).

In some cases we may process additional data needed to provide individual support (for example, information about special educational needs), but only with the necessary legal basis and with additional safeguards.

### 5.2 Parents / legal guardians

For parents / legal guardians we may process:

- **Identification and contact data** – name, surname, contact phone, email, relationship to the student.
- **Account data** – parent account, login, password (hashed).



- **Contract and payment data** – information about contracts, invoices, payments for tuition or additional services (without storing full details of bank cards if payment is processed by a payment service provider).
- **Communication data** – correspondence with the School (email, messenger, platform messages).
- **Technical data** – similar to those for students (IP, logs, device/browser information).

### 5.3 Teachers, tutors and staff

For teachers, tutors and staff we may process:

- **Identity and contact data** – name, surname, contact details, position or role.
- **HR / contract data** – information about employment or contractor status, qualifications, CV, training and performance reviews, where relevant.
- **Financial data** – information required for remuneration, payments and reporting.
- **Professional activity data** – timetable, courses taught, materials created, feedback provided to students, participation in meetings and trainings.
- **Technical data** – use of internal systems, logs of access to the platform, IP and device data (for security and audit purposes).

### 5.4 Website visitors and platform users

For visitors of the website and users who browse public pages we may collect:

- **Cookie and analytics data** – pages viewed, time spent on the site, click paths, approximate location by IP, device and browser characteristics;
- **Form data** – information you send us through registration forms, contact forms or newsletter subscription forms (for example, name, email, message text);
- **Support data** – inquiries to support via chat, email or messengers.

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## 6. Where we get data from

We obtain personal data from:

- **you directly** – when you register, fill out forms, correspond with us, participate in lessons and tests, upload assignments;
- **parents/legal guardians** – when they conclude a contract with the School or register a child on the platform;
- **teachers and staff** – when they fill in information about students' progress, results and attendance;
- **external systems** – when you authorize through an integration or when we import data based on a contract with a partner institution;
- **public sources** – in strictly limited cases (for example, to check qualifications or public professional profiles of teachers), where this is lawful.

We do not intentionally collect data from third parties that are not related to the educational process or our legitimate interests.

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## 7. Why we use data and on what legal basis



We process personal data only when we have a lawful basis to do so. Depending on the situation, this may be:

- performance of a **contract** (for example, a contract for education services);
- our **legitimate interests** (for example, ensuring the security and development of the platform, improving the quality of education);
- **legal obligations** (for example, accounting, reporting);
- **consent** (for certain communications or optional services).

Below are the main purposes of processing.

We use data to:

- 1. Provide educational services and manage learning**
    - creation of accounts and access to the platform;
    - creation of timetable and curriculum;
    - conduction of lessons, tests, exams and assessment;
    - recording learning progress, grades, feedback and certificates.  
*Legal basis:* performance of contract; legitimate interest in organizing the educational process.
  - 2. Communicate with students, parents and staff**
    - sending important notifications about timetable changes, technical issues, educational results;
    - responding to inquiries via email, messengers and support channels.  
*Legal basis:* performance of contract; legitimate interest in ensuring effective communication.
  - 3. Operate, maintain and improve the platform**
    - support, diagnostics and fixing errors;
    - analysis of usage (which features are used and how often);
    - development of new features and services.  
*Legal basis:* legitimate interest in developing and improving the platform.
  - 4. Ensure security and prevent abuse**
    - monitoring suspicious activity;
    - prevention of fraud, cheating in tests, unauthorized access;
    - conducting security audits and penetration testing with specialized providers.  
*Legal basis:* legitimate interest; sometimes legal obligations.
  - 5. Fulfil legal and regulatory obligations**
    - accounting and financial reporting;
    - responding to requests from competent authorities where this is required by law;
    - storage of certain documents for legally established periods.  
*Legal basis:* legal obligations.
  - 6. Send informational and marketing communications**
    - informing about new courses, programmes and events of the School;
    - sending newsletters and surveys.  
*Legal basis:* legitimate interest or consent (depending on applicable law).  
You can opt out of marketing emails at any time by using the unsubscribe link or contacting us.
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## 8. Children's data and parental consent

We primarily provide services to children and young people. Therefore:



- processing of a student's personal data is usually based on a **contract with the parent/legal guardian** and/or their **consent**;
- we ensure that the information provided to children about data processing is clear and age-appropriate;
- where required by law, we obtain **verifiable parental consent** before processing a child's data for certain purposes.

In practice, the parent or legal guardian agrees to the terms of education and data processing by:

- accepting the School's **public offer** (contract);
- signing or submitting an **application for accession** to the offer and providing the necessary data.

The School conducts background checks and applies child protection policies to staff who work directly with children.

## 9. Who we share data with

We do not sell personal data. We share data only where it is necessary and lawful.

We may share data with:

1. **School staff and tutors** – teachers, tutors, administrators and support staff who need data to perform their duties (for example, to teach, assess progress or support students).
2. **Service providers (processors)** – companies that provide services to us, such as:
  - cloud infrastructure and hosting;
  - email and communication tools;
  - payment services;
  - technical support and security.

Such providers process data **only on our instructions** and under data processing agreements that require confidentiality and appropriate security.

3. **Partners in education** – exam boards or partner institutions, where this is necessary for exam registration, issuing certificates or recognition of study results.
4. **Public authorities** – where we are legally obliged to provide information (for example, in response to a lawful request from law enforcement or regulators).

In each case we limit the volume of shared data to what is necessary for the relevant purpose and ensure that appropriate safeguards are in place.

## 10. International (cross-border) data transfers

Our core hosting and databases are located in the **European Union (AWS region eu-central-1, Germany)**. This means that the primary processing of student data takes place within the European Economic Area.

In some cases, supporting services or sub-processors may involve processing in other countries. When this happens:



- data are transferred only to **trusted providers** that offer an adequate level of protection;
- transfers are governed by **Data Processing Agreements (DPAs)** and, where applicable, **Standard Contractual Clauses (SCCs)** or other legally recognized mechanisms;
- data are additionally protected by **encryption in transit and at rest**, strict access controls and **pseudonymization** (use of internal IDs instead of names).

Our publicly available Privacy Policy (this document) includes this section on cross-border transfers, and we may provide more detailed information on request.

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## 11. Pseudonymization and data minimization

To reduce risks for data subjects we apply **data minimization** and **pseudonymization** wherever possible.

In particular:

- for analytics, statistics and AI-related processing we try to use **internal identifiers** instead of names or other direct identifiers;
- the mapping between internal IDs and real identities is stored separately with restricted access;
- before exporting or analyzing data, we remove attributes that are not necessary for the specific purpose (for example, precise contact details when analyzing exam statistics);
- aggregated reports (for example, per class or cohort) do not contain information that would allow easy re-identification of individual students.

These measures help to use data for improving education while protecting the privacy of individuals.

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## 12. Cookies and analytics

Our website and platform may use cookies and similar technologies to:

- ensure correct operation of the site and user sessions;
- remember your preferences (for example, language);
- analyses how the site and platform are used in order to improve them.

We may use both our own cookies and cookies of third-party analytics providers.

You can control cookies through your browser settings. However, disabling certain types of cookies may affect the functioning of the site or platform.

Where required by law, we will ask for your consent before placing non-essential cookies.

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## 13. AI and automated decisions

The Atmo Grow Edu Platform may use **artificial intelligence (AI)** to support the educational process, for example to:



- generate or recommend tasks and questions;
- analyze learning progress and suggest further steps;
- help teachers personalize content.

At the same time:

- AI functions are used **as a tool**, and not as a substitute for teachers;
- important educational decisions (for example, final grades, promotion to the next level) are **not** made solely by automated means;
- teachers and authorized staff can review, modify or reject AI recommendations (“human-in-the-loop” principle);
- we monitor AI models to reduce bias and ensure that recommendations are fair and explainable.

If, in the future, we introduce any form of automated decision-making that has legal or similarly significant effects on you, we will provide additional information and, where required, obtain your consent.

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## 14. Data retention periods

We store personal data:

- for the duration of the contract (study at the School, use of the platform); and
- for an additional period necessary to:
  - fulfil legal obligations (accounting, reporting);
  - protect our rights in case of disputes;
  - conduct statistics and analytics (in anonymized or pseudonymized form).

After these periods expire, data are either:

- **anonymized** for purely statistical purposes; or
- **deleted** from our systems and backups within a reasonable timeframe.

Specific retention periods may differ depending on the type of data and legal requirements.

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## 15. Your rights

Depending on the laws applicable to you (including, where relevant, the GDPR), you may have the following rights in relation to your personal data:

- **Right of access** – to find out which data we process and obtain a copy of them.
- **Right to rectification** – to correct inaccurate or incomplete data.
- **Right to erasure** – in certain cases, to request deletion of your data (“right to be forgotten”).
- **Right to restriction of processing** – to temporarily restrict processing in some situations.
- **Right to data portability** – to receive your data in a structured, commonly used and machine-readable format and transmit them to another controller, if processing is based on contract or consent and is carried out by automated means.
- **Right to object** – to processing based on our legitimate interests, including to object to direct marketing.



- **Right to withdraw consent** – at any time, where processing is based on consent (this will not affect the lawfulness of processing carried out before withdrawal).

The availability and scope of these rights may depend on specific legal rules in your jurisdiction.

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## 16. How to exercise your rights

To exercise any of your rights or to ask questions about this Policy, you can contact us:

- by email: [z.svmchvch@atschool.com.ua](mailto:z.svmchvch@atschool.com.ua) (Ethics & Data Protection Contact); or
- using the official contact details of the School published on our website.

In your request it is helpful to:

- indicate who you are (student, parent/guardian, teacher, etc.);
- specify which right you wish to exercise;
- provide enough information for us to identify you (we may ask for additional clarification to make sure we do not disclose data to third parties).

We will respond within a reasonable timeframe in accordance with applicable law.

If you believe that your rights have been violated, you also have the right to lodge a complaint with the competent data protection authority in your jurisdiction.

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## 17. Data security

We implement technical and organizational security measures, including:

- encryption of data in transit (**HTTPS/TLS**) and at rest;
- role-based access control;
- limiting access to production systems only to authorized staff;
- logging of access and important actions;
- regular internal security checks and, where possible, external security audits / penetration testing.

No system can be guaranteed 100% secure, but we strive to minimize risks and respond promptly to incidents.

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## 18. Changes to this Policy

We may update this Policy from time to time in order to:

- reflect changes in legislation;
- reflect new features of the platform;
- improve clarity and transparency.

The effective date and version number are indicated at the beginning of the document. Significant changes may be communicated additionally (for example, via notices on the platform).