

Privacy Policy

1. Introduction

Welcome to Safe Exchange LMS, operated by StudiHubb, Inc. We are committed to protecting your privacy and ensuring your personal information is secure. This Privacy Policy explains how we collect, use, disclose, and protect your information when you use our services, including courses for Coordinators, Host Families, and Students. We are especially sensitive to the privacy of minors, and this policy outlines the special precautions we take to safeguard the information of users under the age of 13.

By using Safe Exchange LMS, you agree to the collection and use of information per this Privacy Policy.

2. Company Information

Safe Exchange LMS is owned and operated by StudiHubb, Inc. For any questions or concerns regarding this Privacy Policy, you can contact us at:

- **Legal Entity:** StudiHubb, Inc.
- **Physical Address:** 123 Farmington Ave #287, Bristol, CT 06010, USA
- **Email Address:** info@studihubb.com
- **Jurisdiction:** Connecticut, USA

This Privacy Policy is governed by the laws of the United States, particularly the state of Connecticut.

3. Types of Data We Collect

We collect various types of data to improve our services, ensure the smooth functioning of our platform, and enhance the learning experience. The types of data we collect include:

- **Personal Data:** Information that identifies you as an individual, such as:
 - Name
 - Email address
 - City and country of residence
- **Educational Data:** Data that pertains to your academic activities within the platform, including:
 - Courses taken
 - Grades and performance assessments
 - Certifications awarded upon course completion
- **Technical Data:** Information related to your usage of the platform and technical devices, such as:
 - IP addresses
 - Browser type and version
 - Device information (operating system, screen resolution, etc.)
- **Payment Data:** This is not applicable at this time. We do not currently collect or process payment information directly on our platform.

4. Purpose of Data Collection

The data we collect is used for the following purposes:

- **Service Improvement:** We collect personal and educational data to improve the overall functionality and quality of the Safe Exchange LMS. This allows us to personalize course recommendations and optimize user experience.
- **Analytics and Performance Tracking:** We use technical data to monitor user activity on the platform, such as time spent on various courses, overall course completion rates, and student engagement. This data helps us improve the effectiveness of our courses.
- **Communication:** We may use your email address to send you important updates regarding your courses, including course reminders, certificates, and other educational materials.
- **Compliance and Legal Obligations:** We may collect and store your data to comply with applicable laws and regulations, such as U.S. federal laws and the European GDPR, where applicable.

5. Data Sharing and Third Parties

We do not sell or rent your personal data to third parties. However, we may share your data with trusted partners for the following reasons:

- **Intelliboard:** We share user data with Intelliboard, an analytics provider, to track performance metrics on our platform. Hosting organizations and host families that work with students enrolled in our programs will have access to their students' performance data to monitor their academic progress.
- **Legal Compliance:** We may disclose your data if the law requires it, such as in response to a subpoena or court order.

Safe Exchange LMS does not currently integrate third-party payment processors, such as Stripe or PayPal, as there is no payment functionality within the platform at this time.

6. Data Retention Policy

We retain user data for the minimum time necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required by law. Specifically:

- **Personal Data:** Retained for up to two (2) years after completing your last course.
- **Educational Data:** Certificates and course history will be retained for up to two (2) years to provide you with future access to your achievements.
- **Technical Data:** Retained for analysis and optimization purposes for up to two (2) years.

After this period, your data will either be anonymized or securely deleted from our systems.

7. Your Rights Regarding Your Data

Safe Exchange LMS recognizes users' right to control their personal data. As such, you have the following rights:

- **Access and Portability:** You can request access to your data at any time or a copy of your data in a portable format.
- **Rectification:** If you believe any personal data we hold about you is incorrect or incomplete, you can request corrections.
- **Deletion:** You may request that your personal data be deleted from our system if it is no longer necessary for the purposes for which it was collected.
- **Objection and Restriction:** You have the right to object to certain data processing activities or request a restriction on processing your data.

All requests regarding your rights should be directed to our Help Center, where our support team will assist you.

8. Use of Cookies and Tracking Technologies

Safe Exchange LMS uses cookies and similar technologies to enhance user experience and provide better functionality. The cookies we use are primarily for:

- **Session Management:** To keep users logged in securely during their sessions.
- **Time Tracking:** To track how much time users spend on each course and monitor course progress.

We do not use cookies for advertising or profiling purposes. By using our platform, you agree to our use of cookies. You can disable cookies in your browser settings, but this may affect your ability to use certain platform features.

9. Security Measures

We take your security seriously and employ industry-standard practices to protect your data:

- **Encryption:** All data transmitted between your browser and our servers is encrypted using SSL/TLS protocols. This ensures that your data is protected during transmission.
- **Data Storage:** Data is stored on secure servers protected by firewalls and regular security audits.
- **Role-Based Access Control (RBAC):** Access to user data is limited to authorized personnel, such as coordinators, host families, and hosting organizations.

We regularly review and update our security protocols as necessary to ensure that your data remains protected.

10. Children's Privacy

Safe Exchange LMS is particularly mindful of the privacy of minors, especially those under the age of 13 who may be part of the F1 Visa program. To protect the privacy of children, we follow these procedures:

- **Minimal Data Collection:** We only collect data essential for course participation, such as the child's name, email, and, optionally, their country of residence.
- **Encryption:** During transmission, all children's data is encrypted using SSL/TLS to safeguard against unauthorized access.

- **Restricted Access:** Only authorized personnel, such as coordinators, host families, and relevant organizations, can access a minor's data, managed through role-based access controls.

11. Changes to This Privacy Policy

We reserve the right to change this Privacy Policy from time to time. Any significant changes will be communicated to you via email or an announcement on the website. We encourage you to review this Privacy Policy periodically to stay informed about how we protect your information.

12. International Data Transfers

Since Safe Exchange LMS operates globally, personal data may be transferred to and processed in countries other than yours. We ensure that all such data transfers comply with applicable data protection laws, including the GDPR for European users.

13. Contact Information for Privacy Concerns

If you have any questions, concerns, or complaints about this Privacy Policy or our data protection practices, please contact us:

- **Chat Support:** Available through the Safe Exchange LMS website.
- **Email:** info@studihubb.com

We will respond to all inquiries within a reasonable time frame and work to resolve any concerns you may have regarding your privacy.

Date: 09.10.2024