

# Privacy Policy of eGrader, Lukuseula Oy

## 1. eGrader

- eGrader, operated by Lukuseula Oy, is a Finnish software solution developed in 2016
- It offers curriculum-based assessment (CBA) for reading, writing, language, and math skills
- All tasks are rigorously supported by theory-based research
- Educational providers benefit from eGrader by enhancing the identification of learning difficulties and precisely targeting support for those who need it the most
- eGrader serves as a valuable tool for evaluating teaching effectiveness and monitoring equality in education

## 2. Explanation of Terms Used in the Privacy Policy

- **eGrader.** A software solution developed and maintained by Lukuseula Oy.
- **Lukuseula Oy.** Service provider, a Finnish limited company with organization number 3137622-6.
- **Customer.** A party utilizing the eGrader Service (e.g., a municipality or educational institution with an established association with eGrader Oy)
- **Customer User.** Physical persons employed by the Customer and using the eGrader Service (e.g., municipal education experts and registered teachers).
- **Student or End User.** End Users whose learning skills are assessed by the Customer and Customer Users using the eGrader service (e.g., students in a specific school)
- **Personal Information, Processing of Personal Information, Data Controller, and Data Subject.** Defined in the same way as in the European Parliament and Council Regulation (EU) 2016/679 the 27th of April 2016 on the protection of physical persons with regard to the processing of personal data and on the free movement of such data. (**General Data Protection Regulation** or **GDPR**).
- **Pseudonymized Personal Information.** Processing of personal information in a way that no longer allows the identification of a specific person without additional information. Such additional information must be kept separate from the personal information. An example of pseudonymized personal information is a random identifier generated by the software system and always associated with a specific End User, e.g., E89b-422614174000. Such an identifier can only be linked to specific personal data if the separate information that is kept apart from the pseudonymized personal information connects the identifier with the relevant personal data.
- **Card Numbers.** Pseudonymized personal information is collected from municipalities where separate agreements have been made for this purpose.
- **Unique Identification Number.** A unique identification number (code) is generated by the eGrader service used by the Student/End User for login and tests and by Customer User to create classes within the school, review Students' results, and provide test instructions to the Student.

## 3. Nature and Purpose of Processing the Assessed Personal Data

eGrader stores and processes only the personal data of the individuals taking the tests that are necessary for the functioning of the eGrader Service. The Customer acts as the Data Controller,

and eGrader acts as the Data Processor for the personal data of the Student processed in the eGrader Service. eGrader Oy only processes Pseudonymized Personal Data and Research Data (further defined in Section 5. The Information about the Assessed Individuals that is handled and stored by the eGrader Service) and actively strives to ensure that no additional or similar data that can be used to identify the Student are processed in the eGrader Service.

For customers, the student's pseudonymized personal data, such as card numbers, is processed and saved, potentially for use in the municipal system. In some cases, pseudonymized personal data may also be used to transfer necessary anonymous research data about individual Students (agreed upon with the municipality) to eGrader from the same system (e.g., more extensive research data needed for reports requested by the customer and potential research based on the material at a research institution). eGrader cannot identify individual Students based on pseudonymized personal data (card numbers).

#### **4. Nature and Purpose of Processing Customer Users' Personal Data**

The Customer acts as the Data Controller, and eGrader Oy acts as the Data Processor for the personal data of Customer Users (such as teachers or principals) processed by the eGrader Service. eGrader only processes personal data that is absolutely necessary for secure login and usage of the eGrader Service. Such necessary personal data includes, for example, the Customer User's (such as the teacher or principal) email address. The email address is used to provide user support and communicate important messages regarding the use and security of the service. Customer Users can request eGrader Oy to remove their email address from eGrader's database by sending an email to eGrader oy (see section 14, Contact us).

#### **5. The Information about the Assessed Individuals that is handled and stored by the eGrader service**

eGrader service automatically links various public and anonymous data (research data) related to the Student to their unique identification number and/or card number, which eGrader Oy uses in separate investigations, reports, and research for the Customers. Such research data includes:

1. The Student's own information that is provided in the background questionnaire of the eGrader service:
  - Gender
  - Age
  - The Student's Likert-scale assessment of their own reading, writing or mathematical skills (grades 1–3)
  - Latest grade in native language, mathematics and English (grades 4–9)
2. Test results obtained by the Student through the eGrader service
3. Additional information about the Student from the User/Customer, such as:
  - Does the Student receive instruction in English as a second language?
  - Does the Student receive additional instruction in reading or intensified reading instruction?
  - Does the Student receive instruction in English according to an individually adapted curriculum?

4. The name of the Customer's municipality, the name of the Customer's school, and the Student's class designation

The collected information is processed in accordance with the requirements of the EU's data protection regulations (2016/679) and other applicable data protection legislation that may apply to the Customer. Research conducted using the material follows the guidelines of the Finnish National Board on Research Integrity Ethics Committee (TENK 2019).

The eGrader Service enables the User to track the learning skills of the Students (those to be assessed) through repeated tests. Monitoring is done by utilizing the unique number generator of the eGrader Service, where the user creates unique identification numbers for the Students. For example, a user creates 20 different unique identification numbers for the Students in a class using the service. With these unique identification numbers, Students can log into the eGrader Service and perform tasks to assess their reading, writing, language, and mathematical skills. Once the Students have completed the test, the results are saved in the service. If the user wants to monitor changes in the Student's skills, they must archive the results in the service and create a new test. When the new test is created, the same Students can use the same identification numbers to perform the new test, and the user (e.g., the school's special educator) can track the Student's progress. With the exception of Pilot Customers and Customers who have ordered specific reports from eGrades assessments (e.g., school reports or school projects), the Students are identified not only by their unique identification number but also by card numbers. The collection of card numbers is regulated through a separate agreement with the Customer, and it is the Customer's User who registers the card numbers in the service. The card number is pseudonymized personal data that cannot be directly linked to the Students. If the card number is used to store the results for certain Students in the Customer's existing system, the Customer must independently save assessment data based on the card number in their own system, which links the card number to specific personal data about the Students (e.g., name). eGrader does not process such direct personal data, and they are not stored in the eGrader service. The Customer acts as the data controller with regard to the End Users/Students, so it is the Customer's responsibility to ensure that the Students' personal data is processed and stored in the school in accordance with the EU's data protection regulation.

## **6. eGrader and Usernames**

In the eGrader Service, there are five different methods for the customers.

### **6.1 Municipality user**

For the municipalities where a municipality-specific agreement has been made regarding the use of eGrader, the Customer can download all the results for the municipality's Students per class for the eGrader Service using the municipality Username. Additionally, the municipality Username enables the review of the test results within the schools in the municipality.

### **6.2 Main Username**

When the Customer is a school or an educational institution, the holder of the main username (usually a special education teacher) can log in to the eGrader Service and create classes within

their own school. The main user can change their password in the service to enhance security. Unique user codes (student usernames) for the classes are automatically generated based on the school's name, the class code, and the number of Students registered in the service. The password for the End Users in the class is determined by the holder of the main username and is the same for all Students/End Users. The main user can also create a Customer username (teacher username) for the class. Additionally, the main user can view the test results for all Students in the school from the result service. During the presentation of the results, the unique usernames generated by the eGrader Service are used as identification information, and the Students behind these usernames cannot be identified unless one knows which Student has a specific user code.

### **6.3 Customer Username**

When the Customer is a school or an educational institution, the main user (e.g., special educator) can create and assign a Username to the teacher. The teacher can log in with this code to administer the eGrader test for their own class and review the results for the Students based on their unique identification code/number. Teachers can make note of the unique identification codes (in numeric form) assigned to the Students. Direct identifying information noted down is known only to the teacher and/or the special educator, and the teacher/school is responsible for securely storing this information. Additionally, teachers fill in certain research information about the Students in the service (see above section 5) to enable a more precise analysis of the Students' learning abilities and changes over time. The research information is used in any project and school reports ordered by the Customer and in research conducted at research institutions.

### **6.4 End Username**

When the Customer is a school or an educational institution, Students can log in to the service using an End Username (a unique identification code and password created by the main user) to take the test and complete a brief background information questionnaire where research data is collected to enable investigations and studies (refer to point 5 above).

### **6.5 Guardian User Code**

When the Customer is a school or an educational institution, guardians of the Students can log in to the eGrader Service using a Guardian User Code to view their children's results. The Guardian User Code is created after the Students have completed the test. The Customer User (e.g., the teacher) can send these user codes to the guardians. The Customer User is responsible for sending the user codes to the guardian of the Student who has taken the test. With the user code, the guardian can access the Student's results from the tests on the eGrader website ([www.egrader.io](http://www.egrader.io)). Additionally, the Guardian User Code can be used to review the information collected using the user code.

## **7. Disclosure of data to external partners**

If data collected through the eGrader service is shared with external parties, it is done so for research purposes. Only eGrader and members of the research group defined by eGrader are allowed to use the data for research purposes. If data is shared with group members for independent use, the material is anonymized. Research material that could be used to identify assessed personal data, such as individual class codes, is removed from the material.

## **8. Transfer of indirect personal data to countries outside the EU and EEA or to international organizations**

Data is not transferred outside the EU or EEA or to international organizations. If the data is collected outside of the EU, then it can be transferred to countries, where the tests are done.

## **9. Storage periods for personal data and the use of data for research purposes**

Pseudonymized personal data and assessed individuals' data and research data are stored for as long as the Customer utilizes the eGrader Service or until the Customer requests in writing that the information be deleted. The service provider has the right to use the material for research purposes in a pseudonymized form where individual Students cannot be identified. If the material is used in any other way, written consent from the municipality or school is always required.

## **10. Profiling and automated decision-making**

The information in the register is not used for profiling, and there is no automated decision-making based on the information.

## **11. Right to access personal data, opt-out of research and erasure of data**

The eGrader Service processes pseudonymized personal data about individuals and/or the Customer's research data and acts as the data controller towards the Customer. When an assessed individual completes a test, the Customer User sends a Guardian Username to the guardian, who can view the test results of the individuals (Students) they are guardians for on the [www.egrader.io](http://www.egrader.io) website. If the code has not been sent to the guardian after the test, it can be requested, first from the class teacher and, secondly, from the eGrader (see section 14, Contact us). With the parent code, access is granted to the data protection tab where the guardian can see the information collected from the code. If the guardian wishes to have more detailed information about the data collected with the code or wants to have the data removed from the service, the guardian must send an email requesting information or deletion to eGrader (see section 14, Contact us). In the subject line of the message, it should state "Request for Information" or "Request for Deletion," along with the assessed individual's code, e.g., 234216. The code for the individual in question is visible on the guardian's feedback page. If the assessed individual's codes are removed from the service, their learning skills cannot be tracked in the eGrader service. In that case, the individual's learning skills will be assessed (if the use of the eGrader service continues within the municipality or school), but for each assessment, a new unique code will be generated for the individual. If a code is requested to be removed, the Customer User must save the individual's results to preserve the test results for that specific Student. Under no circumstances should the Customer User or guardian directly provide personal information about the assessed individual, such as name or email address, to eGrader. eGrader processes these requests based on the unique Usernames upon the guardian's request. eGrader undertakes to respond to the Customer's written requests for information and delete the assessed individual's data from the service within a reasonable timeframe after the requests have been sent, taking into account available resources.

## **12. Review**

- The Customer has the right to review the Service, its production, and the systems related to the Service Provider.
- The review must be conducted in a manner that does not compromise the data security and confidentiality of the Service Provider's other Customers.
- The Customer is responsible for the costs of the review.
- The Service Provider must address identified deficiencies without undue delay. Significant deficiencies that pose an obvious risk to data security must be addressed immediately.
- The Service Provider will rectify, free of charge, any deficiencies and errors discovered during the review that arise as a result of violations or errors in the Data Protection Agreement.

## **13. Right to file a complaint with the supervisory authority**

If the Data Subject believes that the processing of their personal data violates applicable legislation, the Data Subject has the right to file a complaint with the supervisory authority, the Office of the Data Protection Ombudsman at tietosuoja(at)om.fi

## **14. Contact us**

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