



**International
Education
Evaluations**

IEE PRIVACY POLICY / EU GENERAL DATA PROTECTION REGULATION COMPLIANCE POLICY

International Education Evaluations, LLC (IEE) is committed to ensuring the privacy and accuracy of your confidential information. We do not actively share personal information gathered from our website or servers. We take the protection of your personal data seriously and would like you to feel safe and comfortable when visiting our web pages.

1. Sharing of Information

As a matter of principle, you can visit this website without us requiring any personal data from you. We are merely informed about which IP address has called up which page when, based on a system stored on our website (see below), which ensures an anonymization of the IP addresses.

IEE does, however, share information with other parties at the request of the client / user. For example, IEE receives a transcript from a verifiable source and completes an evaluation based on the information received, IEE may forward the transcript with the evaluation to a school or institution that the client / user has selected.

2. If You Send Us Personal Information

IEE's website will only collect personal information that you knowingly or voluntarily provide by, for example, sending emails, completing an application, chatting, calling our office, or by other means during the normal course of providing the requested service(s).

IEE will only share information about you to other parties when one or more of the following conditions apply

- We have your consent to share the information.
- We need to share your information to provide the service or product you requested

- We need to send your information to companies who work on behalf of IEE to provide a service or product to you.
- We have confirmed that your submitted documents are fraudulent (NACES by-laws require IEE to notify other member companies of all confirmed fraudulent documents).
- We need to respond to subpoenas, court orders, or any other legal process.
- We find it necessary to protect and defend the legal rights and/or property of IEE.

3. Lawful Basis for Collecting or Processing Personal Data

IEE has a lawful basis to collect and process personal data. Most of IEE's collection and processing of personal data will fall under the following categories:

- Processing is necessary for the purposes of the legitimate interests pursued by IEE or a 3rd party.
- Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
- Processing is necessary for compliance with a legal obligation to which IEE is subject.
- The data subject has given consent to the processing of his or her special

There may be some instances where the collection and processing of personal data will be pursuant to other lawful bases.

4. Information Collected and Stored Automatically

If you visit our website, we automatically gather and store the following information about your visit so that we can track the use of our website to make improvements. This automatically collected information is stored and used in the aggregate only and is not under normal circumstances used to contact you personally.

- The type and version of the browser used by you
- The name of the domain from which you access the Internet

- The operating system used
- The website from which you have come to the current page
- The host name (IP address) of your computer
- The time of the access.

5. Cookies

Cookies are small pieces of data stored by the Web browser, often used to remember information about preferences and pages you have visited. By setting preferences in your browser, you can refuse to accept cookies, disable cookies, and remove cookies from your hard drive.

IEE uses cookies in it's webservice platform.

6. European Union General Data Protection Regulation (EU GDPR)

The EU GDPR provides broad privacy protection to individuals physically located in the European Economic Area. Under certain circumstances, the EU GDPR may apply to IEE customers, whether currently located in the EU or associated with academic documents that may come from an EU institution.

When subject to the EU GDPR, IEE will comply with the regulation's core privacy principles, which provide that personal data shall be:

- Processed lawfully, fairly and in a transparent manner;
- Collected for specific, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- Limited to what is necessary in relation to the purposes for which they are processed;
- Accurate, kept up to date, and secure;
- Retained only as long as necessary

Personal data is defined very broadly under the EU GDPR, and consists of any information relating to an identified or identifiable person and includes a person's name, ID number, location data, online identifier, or to one or more

factors specific to the physical, psychological, genetic, mental, economic, cultural or social identity of that person.

7. Recipients of the data

Internal bodies and / or organizational units as well as other companies affiliated to us receive your data only if they need such data to fulfil their contractual and statutory obligations or we need the data within the framework of the processing and enforcement of our legitimate interest.

Any sharing of your data with external recipients is carried out in connection with the contractual performance, insofar as we are obliged to inform, notify or share data in order to meet statutory provisions, if you have given us your consent to the transfer to third parties or external service providers who act on our instructions as contract processors or take over functions for us (e.g. IT service providers, data centers, data destruction companies or courier services).

8. Duration of data retention

We comply with the principles of data avoidance and data minimization. We, therefore, store your personal data, if we collect them at all, only as long as this is necessary to achieve the purpose of data processing or as provided for by the different retention periods stipulated by the legislator. If the respective purpose no longer exists, in the event of withdrawal of your consent and / or expiration of the statutory retention period, the corresponding data are blocked or erased routinely and in accordance with the statutory provisions.

9. Your rights as a data subject concerned by the data collection

If you exercise your rights in accordance with this section in conformity with the applicable law, we will inform all recipients to whom personal data have been transferred about the rectification or erasure of your personal data made at your request or the restriction of processing, provided that such notification is not impossible or does not involve a disproportionately high effort.

If you exercise your rights and / or would like to have all relevant information, please contact us using the contact details referred to in Clause 11. No later than within one month of receipt of your request we will reply. In accordance with the applicable law and the following statements you are entitled to demand information about your personal data, their rectification, erasure or portability (e.g. transfer of your personal data to another service provider) of your personal data processed by us as well as a restriction of processing.

- Right to access your personal data

- Correct or modify your personal data

- Erasure of your personal data

- Restriction of processing

- Portability of your personal data

- Withdrawal of your consent / rights of withdrawal

- Rights of withdrawal

To exercise the above rights, data subjects should contact IEE via staffan@myiee.org

10. Complaint to the competent data protection authority

You have the right to submit a complaint about our data processing at any data protection authority. The IEE contact responsible for Privacy and Personal Data is Staffan Moritz and may be contacted by email at staffan@myiee.org

11. Amendment to our data privacy provisions

We reserve the right to amend this Data Privacy Statement from time to time so that it complies at all times with the respectively up to date legal requirements or to implement changes in respect of our services in the Data Privacy Statement, e.g. at the launch of new services. For your next visit the new Data Privacy Statement will then apply.