

PRIVACY POLICY

The Beyond42 Virtual Platform is owned and operated by BEYOND 42 d.o.o. Beograd, registration number 21479900, with its registered office at Veljka Dugoševića 54, 11000 Belgrade, Republic of Serbia. <https://mefer.beyond42.com> is an instance of the Beyond42 Virtual Platform created for FURIM Institutt, Ivan Bjørndals gate 9, 0472 Oslo, Norway, as project coordinator for "MEtaverse Futures: Education beyond Realms – MEFER" (Erasmus+ Agreement No. 2024-2-NO02-KA220-YOU-000285372).

BEYOND 42 d.o.o. takes the processing of personal data very responsibly and seriously and in accordance with this, this Privacy Policy has been adopted. Collection, storage, processing and transfer of personal data, as well as all other actions related to personal data are performed exclusively in accordance with the law, including but not limited to the Law on Personal Data Protection ("Official Gazette of RS" , No. 87/2018, this law is compliant with General Data Protection Regulation GDPR).

In terms of the **Act on the Protection of Personal Data** ("RS Official Gazette", no. 87/2018, hereinafter referred to as **APPD**), Beyond42 is the **Operator** who organizes and is responsible for the processing of personal data. This Policy contains an overview of activities related to the processing of personal data organized and conducted by the Handler, as well as other information relevant to the persons whose data are processed.

The privacy policy aims to inform and provide all necessary information to individuals about which data we collect, for what purpose, how long we keep it, what type of protection we apply and on what basis we process it. In order to facilitate understanding of the Privacy Policy as well as the terms we use, for the purposes of this Policy, these terms have the following meaning:

- Personal data means any information relating to a natural person whose identity is determined or identifiable by such information;
- The person to whom the data relates entails the natural person whose personal data is processed;
- Handler signifies Beyond42, since they determine the purpose and manner of processing personal data;
- Processor includes a natural or legal person who processes personal data on behalf of the Handler;
- Processing of personal data entails any action performed with personal data such as collection, transmission, storage, but also other actions of using personal data (hereinafter: processing);
- Commissioner means the Commissioner for Information of Public Importance and Personal Data Protection.

If you have any questions regarding this Privacy Policy or the processing of personal data, please contact us at support@beyond42.com.

1. HOW DO WE COLLECT PERSONAL DATA AND WHICH DATA DO WE COLLECT AND PROCESS?

BEYOND 42 d.o.o. Beograd collects and processes personal data relating to individuals who visit or use the Beyond42 Virtual Platform at <https://mefer.beyond42.com> as described below:

By voluntarily applying or registering at <https://mefer.beyond42.com>, you provide personal data on the basis of informed consent.

When a person visits <https://mefer.beyond42.com> and selects the "Register" option, they submit personal data through the registration form. Depending on the registration

method and enabled platform functionality, this may include name, surname, email address, contact details, organization or project affiliation, and other information voluntarily provided by the person. Such data is collected only for the stated purposes and on an appropriate legal basis.

We collect data related to technical information as follows:

When you visit the Beyond42 Virtual Platform, whether you register or only browse the platform, certain technical and usage information may be automatically collected, including login and access log data:

Web server records. Like the vast majority of Internet sites, we automatically collect information about you from the web server logs when you visit one of our sites through the host computer on which our site (web server) is located. The web server automatically recognizes some non-personal information, such as the network ("IP") address (other than those described below), the date and time you visited our website, the links you opened on our website, the page you came from, the type of browser you are using (e.g. Internet Explorer, Firefox, Chrome), the type of operating system you are using (e.g. Windows XP, MAC OS X), and the domain and address of your ISP. We often review server logs to see what is being visited, all in order to better understand the way visitors use our site. This data is popularly called web statistics and allows us to maintain and improve our service. In addition, in the event of system abuse, we may use this information to successfully identify the source of the abuse, together with your ISP and / or local authorities.

IP or network address - this page uses the Internet Protocol (IP) address. An IP address is a number that your ISP assigns to your device so that you can access the Internet first. The IP address changes each time you connect to the Internet (this is a "dynamic" address). However, it is possible that the IP address we record, and even the cookie we use, may contain information based on which we can identify you. The reason is that some connections do not change the IP address (it is static) and can connect to a computer. As already mentioned, IP addresses are part of the information contained in the web server records. We use your IP address to record total usage data and improve our website.

If a live session, meeting or other activity on the MEFER platform is to be recorded, participants will be informed in advance and the recording will be made only where an appropriate legal basis exists.

Any recordings or materials created by FURIM Institutt or other MEFER project partners are governed by their applicable notices and terms. BEYOND 42 d.o.o. does not retain such recordings unless this is necessary to provide the service and has been expressly agreed with the responsible project organization.

Personal data is collected only to the extent necessary to achieve a specific purpose.

2. WHAT IS THE LEGAL BASIS OF PROCESSING?

Beyond42 collects and processes personal data only with the existence of an appropriate legal basis, and depending on the purpose for which the collection should be achieved, they differ:

Processing based on informed consent of the person whose data are processed, with prior notification of the data subject on all relevant aspects processing. The consent of

the person whose data are processed is voluntary, explicit, unambiguous and can be withdrawn at any time, which entails the cessation of further processing;

Processing for the purpose of fulfilling legal obligations. When collecting data for the purpose of fulfilling legal obligations, Beyond42 does so exclusively to the extent necessary, and access to data is provided only to authorized persons and bodies;

Processing for the purpose of fulfilling obligations from the contractual relationship, i.e. preparation for concluding the contract. Beyond42 as a contracting party, offers various types of services to legal entities, entrepreneurs, individuals, etc. In the process of concluding and fulfilling obligations from the contractual relationship, Beyond42 processes personal data. Also, in order to exercise its rights, on the basis of the services it provides, as well as to establish a business relationship, it collects and processes certain personal data. Beyond42 is limited to the processing of personal data that is necessary to achieve a specific purpose.

Processing in order to realize the legitimate interest of Beyond42 and the legitimate interest of third parties. Beyond42 only exceptionally processes personal data in order to achieve a certain legitimate interest, such as protection of the security of facilities, people and property, prevention of abuse and the like. He uses this possibility only exceptionally, and only when the protection of a legitimate interest clearly prevails over the protection of personal data.

3. FOR WHAT PURPOSES DO WE USE THE DATA?

Beyond42 uses the data for various purposes that are always closely related to the legal basis of the processing.

We use data collected through <https://mefer.beyond42.com> to operate and deliver the MEFER educational experience, enable access to platform functionalities, provide technical support, maintain security, and improve the platform. Personal data will not be made public unless the user chooses to publish it through an enabled platform function. Aggregated or anonymized reports and analyses may be produced where individuals cannot reasonably be identified.

When you register on <https://mefer.beyond42.com>, the data you provide is stored in the platform or associated databases so that you can log in and use the available educational content and functionalities. Required fields will be clearly indicated. If you do not provide required information, you may be unable to complete registration or use the relevant functionality.

Where processing relies on consent, it will take place only after you have actively confirmed your acceptance of this Privacy Policy or otherwise provided valid consent. You may withdraw consent at any time, without affecting the lawfulness of processing carried out before withdrawal.

Technical data is used only as necessary to operate, secure, troubleshoot and improve <https://mefer.beyond42.com>, and to produce aggregated usage statistics. Where technical data can identify or be linked to an individual, it is treated as personal data and protected accordingly.

4. WHO HAS ACCESS TO YOUR DATA?

Depending on the legal basis and specific purpose, the following categories of persons may have access:

Authorized employees, associates or service providers of BEYOND 42 d.o.o. Beograd may access personal data only to the extent necessary to provide, maintain or support the platform. They may not use the data for unrelated purposes.

BEYOND 42 d.o.o. Belgrade requires its associates to sign agreements, to respect security and privacy in accordance with these Privacy Rules and the Law on Personal Data Protection of the Republic of Serbia ("Official Gazette of RS", No. 87/2018)

Your data may be passed on to third parties, if such transfer is related to the purpose for which your data was collected. In this case, we require that a third party process your data in accordance with these policies. All third parties with whom we share your data must be contractually obliged to provide a level of protection that is at least at the level provided by these rules and the Law on Personal Data Protection of the Republic of Serbia ("Official Gazette of RS", No. 87/2018)).

Personal data may be transferred between the Republic of Serbia, Norway, the European Economic Area, and other locations where BEYOND 42 d.o.o., FURIM Institut, MEFER project partners or authorized service providers operate, only where a lawful transfer mechanism and appropriate safeguards are in place.

5. WHAT RIGHTS DO YOU HAVE IN RELATION TO YOUR PERSONAL DATA?

You have the right to:

- request access to your personal data,
- request correction or deletion of your personal data or restriction of processing,
- right to object to the processing of your data,
- right to have your data transferred to other controllers,
- right to contact the competent authority in case you suspect that there is illegal processing,
- other rights prescribed by applicable regulations.

6. HOW IS YOUR DATA PROTECTED?

Beyond42 within its business organization strives to apply the highest possible standards in the field of personal data protection, and applies all necessary organizational, technical and personnel measures, including, but not limited to:

- technical protection measures,
- control of physical access to the system where they are stored Personal data,
- data access control,
- data transfer control,
- data entry control,
- Data availability control,
- Other IT security measures,
- all other measures necessary for the protection of personal data.

All processors and / or recipients of personal data are also obliged to apply all prescribed protection measures.

7. Use of our services by children and minors

The MEFER platform is intended for young people, educators and other participants in the MEFER project. Users under the age permitted to provide valid consent under applicable law

may use the platform only with the authorization of a parent or legal guardian, or under another lawful basis established by the responsible project organization.

8. HOW LONG IS YOUR DATA STORED?

We store the data for the period necessary to achieve a certain, specific purpose, after which the data are deleted or made unrecognizable (anonymization measures). A specific retention period is prescribed for each individual purpose and each person whose data are processed is informed in advance.

In the event that personal data are collected on the basis of previously obtained consent, the data shall be deleted or anonymized without delay within a period not exceeding 10 days from the withdrawal of consent.

9. WHO CAN YOU CONTACT FOR MORE INFORMATION ?

For all questions relating to the processing of personal data, including requests to exercise your rights, please contact support@beyond42.com. Where a request concerns data controlled by FURIM Institutt or another MEFER project partner, it may be forwarded to the responsible organization.

The controller will respond to each request of the person whose data are processed as soon as possible, depending on the complexity of the request, but each within no longer than 30 days from the date of the address of the data subject.

This Privacy Policy may be amended from time to time without reducing the level of protection afforded to data subjects. Amendments take effect when published on <https://mefer.beyond42.com>. Users will be informed of material changes through the platform or another appropriate communication channel.