

VPS Privacy Policy

Effective Date: August 1, 2024

At VPS, we are committed to protecting the privacy of users on FPSOnline and safeguarding the personal data we process. This Privacy Policy outlines how VPS collects, uses, and protects personal information provided through the FPSOnline platform.

1. Scope of the Privacy Policy

This Privacy Policy applies to the personal data VPS processes as a service provider for FPSOnline. VPS operates as a **“data processor”** under applicable data protection laws and processes personal data on behalf of Future Problem Solving (FPS), which may act as a **“data controller.”**

2. Personal Data We Process

As a service provider to FPSOnline, VPS may process the following categories of personal data:

- **Student Information:** Name, grade level, school affiliation, and project participation details.
- **Evaluator Information:** Name, contact information, and related professional data.
- **Account Information:** Usernames, passwords, and related security credentials.
- **Technical Information:** IP addresses, device identifiers, and usage data related to FPSOnline.

3. Purpose of Data Processing

VPS processes personal data solely for the purposes of providing services to FPSOnline, including:

- Managing user accounts and access to the platform.
- Supporting educational activities and project evaluations.
- Maintaining and improving the security and functionality of FPSOnline.
- Providing technical support and troubleshooting.

VPS will not use personal data for any purpose beyond those authorized by FPS.

4. Legal Basis for Processing

As a data processor, VPS relies on the instructions provided by FPS, which determines the legal basis for processing personal data under applicable laws. VPS does not independently determine the purposes or legal basis for data processing.

5. Data Sharing and Disclosure

VPS does not sell or share personal data with third parties except:

- To authorized third-party service providers who assist in providing the platform services.
- As required by law, legal process, or governmental request.

All third-party providers are contractually obligated to maintain the confidentiality and security of personal data.

6. Data Security and Breach Notification

VPS employs industry-standard security measures to protect personal data, including but not limited to:

- Data encryption in transit and at rest.
- Secure access controls and authentication protocols.
- Regular monitoring and vulnerability assessments.
- Firewalls and intrusion detection systems.

Data Breach Notification

In the event of a **data breach** that affects personal data processed on behalf of FPS, VPS will:

1. **Promptly Notify FPS** – VPS will notify FPS **without undue delay** upon becoming aware of a data breach that compromises the confidentiality, integrity, or availability of personal data.
2. **Provide Relevant Details** – The notification to FPS will include:
 - A description of the nature of the breach, including the categories and approximate number of affected individuals and records.
 - The likely consequences of the breach.
 - Measures taken or proposed to be taken to address the breach and mitigate its effects.

3. **Support FPS in Compliance** – VPS will assist FPS in fulfilling any legal obligations related to the breach, including notifications to affected individuals or regulatory authorities, as required by applicable data protection laws.
4. **Conduct a Security Review** – VPS will investigate the breach, identify its root cause, and implement corrective measures to prevent future occurrences.

7. Data Retention

VPS retains personal data only as long as necessary to fulfill our contractual obligations to FPS or as required by law. Personal data will be **retained for a maximum of 1 year** following the conclusion of a user's active engagement with FPSOnline, unless FPS requests an alternative retention period in accordance with its data policies.

Upon the expiration of this retention period, VPS will securely **delete or anonymize** personal data unless legal or regulatory obligations require continued storage.

8. User Rights

As VPS is a data processor, any requests to access, modify, or delete personal data must be directed to FPS as the data controller. VPS will support FPS in responding to such requests in compliance with applicable laws.

9. International Data Transfers

VPS may process personal data on servers located in different jurisdictions. We will ensure that appropriate safeguards are in place to protect personal data during any such transfers in compliance with applicable data protection laws.

10. Children's Privacy

VPS recognizes the importance of protecting children's privacy and processes personal data of children only as authorized by FPS for educational purposes. We do not knowingly collect or process data directly from children without the consent of FPS.

11. Changes to This Privacy Policy

VPS may update this Privacy Policy from time to time to reflect changes in our services or applicable data protection laws. Any updates will be communicated to FPS for posting on FPSOnline.

12. Contact Information

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

VPS Data Protection Officer

Erik Guzik

erik@virtualproblemsolving.org

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