

Data security & privacy measures

1. Technical security measures

- 1.1.** Delightex Edu carries out regularly - and at least annually - an assessment of whether procedures, policies and records of processing activities must be updated.
- 1.2.** Delightex Edu has installed an antivirus program that is continuously updated for the systems and databases used to process personal data.
- 1.3.** Delightex Edu has ensured that external access to systems and databases used for processing personal data happens through a secured firewall.
- 1.4.** Delightex Edu's internal network is segmented in order to ensure limited access to systems and databases used to process personal data.
- 1.5.** Delightex Edu has ensured that access to personal data is isolated to users with a work-related need.
- 1.6.** Delightex Edu's systems and databases used for processing personal data are established with system monitoring with alarm.
- 1.7.** Delightex Edu applies TLS 1.2 encryption to protect all data in transit over the public network, including the encryption of data that is communicated between the user, web applications and database systems?
- 1.8.** Data at rest is protected by AES-256 encryption algorithms, data in transit is protected by HTTPS encryption.
- 1.9.** Delightex Edu logs changes made by system administrators, changes in log settings, including the deactivation of logging, changes in system users permissions and failed attempts to login to Delightex Edu's systems, databases and networks.
- 1.10.** Delightex Edu has ensured that implemented technical security measures are being tested continuously by the use of vulnerability scans and penetration tests.
- 1.11.** Changes to systems, databases and network follow procedures that ensure maintenance with relevant updates and patches, including security patches.
- 1.12.** Delightex Edu has formalized procedures for the assignment and revocation of user access to personal data, after which user access is reassessed regularly, including whether rights can still be justified by a work-related need.

2. Organizational security measures

2.1. Delightex Edu's employees sign a non disclosure agreement when being hired and are introduced to the IT security policies and data processing procedures and other relevant information related to the employees' processing of personal data.

2.2. The Company has implemented a procedure that ensures the withdrawal of assets and user rights upon resignation of employees.

3. Procedures for erasure and return of personal data

3.1. Delightex Edu has agreed on specific requirements for retention periods and erasure routines.

4. Storage of personal data

4.1. Delightex Edu only processes personal data, including storage of the personal data on approved locations, countries or territories.

5. Transfer of personal data

5.1. Delightex Edu has written procedures which regulate that transfer of personal data to third countries or international organizations must only happen in accordance with the data processing agreement and on the basis of valid transfer basis.

6. Personal data breach

6.1. Delightex Edu has implemented controls for identifying personal data breaches.