

# ELEARNING EXPERTS

## GDPR Compliance

### Overview

Elearning Experts LLC (“We”, “Us”) provide hosting for Moodle™ and Totara Learn to education and commercial organizations for the provision of online learning platforms. Our goal is to enable users to have a high quality online learning experience, and to provide consultation, training, and support services to organizations of many kinds.

We take the privacy of your personal information very seriously.

Together with our Privacy Policy (available at <http://elearningexperts.net/terms/>), this document will help you better understand the personal information we collect, why we collect it, how we use it, and how we protect it. In full compliance with the General Data Protection Regulation (EU) 2016/679 (“GDPR”), effective May 25, 2018, this document also explains the various rights of the data subject, including the right of access and the right to erasure (aka “the right to be forgotten”).

### Hosting for Moodle™ and Totara Learn

Both Moodle™ and Totara Learn are online learning management systems designed to provide a platform for managing learners, content, and learner data in a virtual learning environment.

Both Moodle™ and Totara Learn may be used along with other software which are not owned or controlled by us. Some of these include Course Merchant, Intelliboard, Active Directory, Stripe, PayPal, various Student Information Systems (SIS) and various Human Resource Information Systems (HRIS).

# Grant of Consent

Users access our online software through the Internet. In this regard, Elearning Experts LLC is a “Data Processor”. Third party software is typically hosted by the company in control of that software, and data that is transferred to, from, or through that software is not under the control of Elearning Experts. Consistent with GDPR, we refer to these third party organizations (including our clients) as the “Data Controller”.

Each Data Controller has its own Terms of Use of use which you either accepted directly (when you initially logged into the LMS) or were asked to accept by us, on behalf of the Data Controller. In accordance with these terms of use and consistent with our Privacy Policy, you gave the Data Controller and us permission to collect, use and share your personal information.

## Our Collection and Use of Your Personal Information

We capture personal information when you login to Moodle™ or Totara Learn and when you share information during interactions in an asynchronous, synchronous, or live online class. Furthermore, if a live online session is recorded, then personal information may also appear in the subsequent recording (such as your chat messages).

### What happens when you login?

When you login to any of our sites through a URL we receive authentication information which includes a username and the password.

We also receive additional information during the login process and during typical interaction with the site, which may include:

- Server logs (IP address, browser type, browser version, OS)
- Some or all of the information as outlined in [Moodle's Privacy Notice and Data Processing Agreement](#) as of this writing

We use your data to provide you support (such as troubleshooting a support ticket) and for creating usage reports that we may make available to the Data Controller.

## Where do we store our data?

We store data on the US AWS East-West region.

## For how long do we store data we collect?

Backups of sites are kept according to our [Service Agreement](#) or according to Custom Backup solutions configured specifically by a given client.

If a Data Controller ceases to be a customer, we delete all data associated with the account within 90 days of the end of their contract with us.

## How do we restrict access to data we collect?

For access to our sites, users must login as either an Authenticated User or Guest.

We place strict controls over our employees' access to Relevant Data and are committed to ensuring that these data are not seen by anyone who should not have access to them.

The operation of the Service requires that some of our employees have access to the systems we use for processing Relevant Data (e.g., in order to diagnose a problem you are having with the Service, we may need to access your site, including its Relevant Data). These employees are prohibited from using their access permissions to view Relevant Data unless it is necessary to do so.

We have technical controls and policies in place to ensure that any access to a site is logged. These logs are retained for a minimum of 7 days. All of our employees and contract personnel are bound to our policies regarding Relevant Data and the security of these data is a matter of great importance to us.

## What information do we retain for support purposes and for how long?

We retain data related to support for a minimum of one year after a client terminates its contract with us. Exceptions to this policy are made to accommodate needs for shorter or longer periods of data retention.

As of this writing, servers which support our CRM and Support Portal are located in the USA and EU (one in Amsterdam, the Netherlands and another in Dublin, Ireland). Data is distributed on the servers by our vendor, ZOHO.

We use this Support Data to resolve virtually any issue that a client deems sufficiently important for which to raise a ticket.

## How Do We Secure Our Infrastructure?

We adhere to a number of industry best practices for securing our infrastructure, which include:

- We restrict access to all servers containing personal information to only employees in the company who must have access to perform their job.
- VPN access is required to establish a passwordless connection to any server through revocable keys. Access is granted to 'n' number of servers as required.
- Access to our servers is only through revocable keys.
- All servers are regularly updated with the latest security patches.
- All employees are trained on our privacy policy.

## Who Is the Data Protection Officer (DPO) for Elearning Experts LLC?

The DPO is Katherine Robeson, CEO of Elearning Experts LLC. You can contact her at [privacy@elearningexperts.net](mailto:privacy@elearningexperts.net).

## How Can You Request Access to Your Personal Information?

If you are an individual, you must reach out to the Data Controller at the organization to whom we provide services. This may be your school, your employer, your church, or other entity for which we manage online learning or provide Services. They will make a request to us for the

data you require. We cannot verify or action requests for information without the approval of the Data Controller.

## How Can You Request Deletion of Your Personal Information?

If you are an individual, you must reach out to the Data Controller at the organization for whom we provide services. This may be your school, your employer, your church, or other entity for which we manage online learning or provide Services. They will make a request of us to delete your personal information. We cannot verify or action requests for information without the approval of the Data Controller. Note that there may be situations which make it unlawful in the US for us to delete your personal data. Please speak with your Data Controller for additional information about restrictions.

If you are our client, reach out to us through [privacy@elearningexperts.net](mailto:privacy@elearningexperts.net).

## How Can You Contact Us?

If you have any questions about this document or our support for GDPR or about our Privacy Policy, please contact us directly at [privacy@elearningexperts.net](mailto:privacy@elearningexperts.net).

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