OWLYPIA - PRIVACY POLICY

Effective date: 30 September 2026

1. Introduction

This Privacy Policy explains how Perceptum Education Ltd., trading as Owlypia ("Owlypia", "we", "us" or "our"), collects, uses, stores, shares and protects personal information when people use our websites, learning platform, registration systems, competitions, events, programmes and related services. Where the law of a participant's country provides a higher level of protection than this Policy, we will apply the higher standard to the extent required by applicable law.

2. Who This Policy Applies To

This Privacy Policy applies to:

- Students and participants.
- Parents and legal guardians.
- Teachers, supervisors and school representatives.
- Judges, coordinators, ambassadors and volunteers.
- Local organisers, partners and host institutions.
- Website visitors and users of the Owlypia learning platform.

3. About Owlypia Services

Owlypia is a United Kingdom-based international educational platform and academic challenge for students aged 9-18. Our services include online learning activities through the Owlypia LMS, Online Rounds, Local Rounds, Regional Rounds, Global Rounds, and educational challenges, assessments, presentations and teamwork activities.

4. Personal Information We Collect

We collect only information reasonably needed for the service or activity. This includes:

- **Account and identity information:** First name and surname, username, email address, date of birth or age band, country of residence, and school/educational institution details.

- **Parent/Guardian information:** Name, contact information, relationship to the participant, and consent/approval records.
- **Payment and transaction information:** Billing details and transaction references needed to process registrations and refunds. Card payments are processed by Stripe. Owlypia does not store full card numbers. Stripe may collect device and browser information to complete card authentication (including 3D Secure) and to prevent fraud, and may share limited transaction and risk signals with the cardholder's bank and card networks for that purpose. Stripe's use of that information is described in Stripe's Privacy Policy.
- **Technical information:** IP address, browser and device information, login logs, and cookies.

5. Information Related to Owlypia Activities

To deliver our educational programmes, we process:

- **Learning-platform information:** Course enrolment, quiz results, learning submissions, and essay/speaking audio submissions.
- **Competition information:** Selected round, age category, team information, scores, rankings, awards, and certificates.
- **Event, travel and safety information:** For in-person events, we collect information reasonably necessary to administer attendance, accommodation, transportation, emergency contact arrangements, dietary requirements, or safeguarding.

6. How We Use Personal Information

We process personal information based on lawful bases (such as contract fulfillment, legal obligation, legitimate interests, or consent) to:

- Create and manage accounts and deliver learning services.
- Register and administer participation in rounds and events.
- Run competitions, assess student work, and determine results.
- Process payments and refunds.
- Manage safeguarding, event safety, and emergency protocols.
- Protect users and systems from fraud or security threats.

7. Children's Privacy

Children deserve specific protection for their personal information. Owlypia designs its services with the interests, age and reasonable expectations of student participants in mind. Child accounts and learning areas use high-privacy settings by default. We do not use logged-in child accounts for behavioural advertising or advertising profiling, and we do not sell children's personal information.

8. Parent and Legal Guardian Information

Where applicable law requires parental authorisation for a child's online account or a particular use of personal information, Owlypia will obtain that authorisation before the relevant processing takes place. Additional parental-verification requirements may apply depending on local laws, such as the UK GDPR or the US Children's Online Privacy Protection Act (COPPA).

9. Photos, Videos and Media

Owlypia events may involve photography or video. Identifiable promotional use of a participant under 18 is handled under our separate Photo, Video & Media Policy and applicable permission process. We do not require promotional-media permission as a condition of participation. Where permission is withdrawn, we will stop future uses covered by that permission.

10. Publication of Participant Information

Public recognition is managed under data-minimisation principles. Owlypia's default public-results format for participants under 18 is designed to minimise identification. Unless a separate permission has been obtained for fuller publication, we may use a participant's first name, surname initial, country and award/result category (e.g., Emma S. | United Kingdom | Gold Award). We do not publish a child's date of birth or contact details.

11. Student Submissions and Intellectual Property

Students may submit essays, videos, audio, artwork and other work as part of Owlypia activities. Submission for judging or educational feedback does not by itself grant Owlypia an unrestricted promotional licence. Owlypia may process the submission to operate the relevant activity, assess it, provide feedback, and administer results.

12. AI-Assisted Assessment and Transparency

Owlypia may use AI-assisted tools to support educational processes, such as reviewing written essays or speaking submissions, and generating feedback to help students understand their strengths and areas for improvement. These AI tools are used strictly as educational support tools and are not intended to replace responsible human oversight. Owlypia will not rely solely on automated processing to make a decision about a child that produces legal or similarly significant effects; appropriate review processes and assessment criteria are always applied by our teams. Furthermore, we actively seek to prevent student submissions from being used for unrelated model training by external AI providers.

13. Sharing Personal Information

We do not share personal information indiscriminately. We may share it only where reasonably necessary with:

- Hosting, cloud, database and IT-security providers.
- Payment processors and communications providers.
- AI or assessment service providers used for disclosed educational functions.
- Authorised schools, supervisors, local organisers, and host institutions.
- Travel, accommodation, or transport providers where requested.
- Public authorities or regulators where required by law.

14. International Data Transfers

Owlypia operates internationally and some service providers or event partners may process information outside the United Kingdom or the country in which a participant lives. Where restricted-transfer rules apply, we use an applicable lawful transfer mechanism, such as UK adequacy regulations, the UK International Data Transfer Agreement (IDTA), or Standard Contractual Clauses.

15. Cookies and Website Technologies

We use strictly necessary cookies and similar technologies to operate and secure our services. Non-essential analytics or advertising technologies are used only in accordance with our Cookie Policy and applicable consent rules.

16. Data Security

We use proportionate technical and organisational measures designed to protect personal information from unauthorised access, accidental loss, alteration, disclosure or destruction. Measures may include access controls, role-based permissions, secure transmission, and incident-response processes.

17. Data Retention

We keep personal information only for as long as necessary for the purpose for which it was collected, to protect participants, and to meet legal, accounting, and safeguarding obligations. When information is no longer required, it is deleted, anonymised or securely archived.

18. Your Rights

Depending on where you live and the law that applies, you may have rights to access, correct, delete or restrict personal information, object to certain processing, and withdraw consent.

- **UK & EEA:** Regulated under UK GDPR, Data Protection Act 2018, and EU GDPR.
- **United States:** COPPA compliance includes verifiable parental consent for children under 13 where required.
- **Türkiye:** Handled in accordance with Law No. 6698 (KVKK) and applicable secondary legislation.
- **Canada & Australia:** Applicable consent, transparency, access, and security requirements are honored.

19. Changes to this Policy

We may update this Policy to reflect changes in our services, legal requirements or privacy practices. Where a change materially affects how we use children's information, we will provide appropriate notice and obtain new consent where required.

20. Contact Us

For privacy enquiries and rights requests:

Email: info@owlypia.org

Data Controller: Perceptum Education Ltd. trading as Owlypia

Address: 124 City Road, London, EC1V 2NX, United Kingdom