



Privacy Policy

Online Academy, SmartClass and related educational services

Version	4.0
Effective date	28 July 2026

This English version is provided for convenience. In the event of any discrepancy, ambiguity or difference in interpretation, the Serbian-language version shall prevail.

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1. Scope and application

This Privacy Policy explains how Online Academy collects, uses, stores, shares and protects personal data in connection with the onlineacademy.rs website, the contact form, user accounts, the SmartClass digital educational environment, live teaching, courses, materials, assignments, communication and other related educational services.

This Policy applies to website visitors, individuals who send us enquiries, registered users, pupils and students, parents or guardians, educators, administrators, associates and representatives of educational organisations who contact us regarding potential cooperation, pilot programmes or tailored solutions.

Personal data is processed in accordance with the Personal Data Protection Act of the Republic of Serbia and other applicable regulations.

Brand / service	Online Academy / SmartClass
Data controller	MILENA STANKOVIĆ CEROVIĆ PR POMOĆNO OBRAZOVANJE ONLINE ACADEMY ZAJEČAR
Registered office / postal address	Kneginje Ljubice 2/15, 19000 Zaječar, Republic of Serbia
Privacy contact	onlineacademy.uprava@gmail.com +381 64 277 09 83

2. Personal data we may process

2.1. Data you provide through the website and contact form

- full name;
- email address;
- name of school or organisation, or area of work, when provided voluntarily;
- the content of your message and any information included in your enquiry;
- the language in which you use the website or submit an enquiry.

The field for a school, organisation or area of work is optional. Please do not submit sensitive personal data or personal data relating to other individuals through the contact form unless it is necessary for us to respond to your enquiry.

2.2. User account and access data

- user identifier, first name, last name and email address;
- user role and access permissions;
- password in hashed form when local sign-in is used;
- Google identifier and basic account data provided by Google when the user chooses to sign in with a Google account;
- records of registration, sign-in and acceptance of applicable terms or notices;
- assigned courses, packages and access periods.

2.3. Learning data and use of the SmartClass environment

Depending on the relevant course, programme and enabled modules, we may process:

- attendance and participation in live teaching;
- viewed content, opened materials and completed activities;

- assignments, deadlines, submissions, results and feedback;
- notes, drawings, formulas and other content saved by the user in SmartClass Notes;
- answers and work completed in SmartClass Worksheets;
- messages, questions, posts and content in SmartClass Study Group and other communication features;
- data relating to consultations, mentoring, checkpoint activities and progress where these form part of an educational programme.

SmartClass is not designed to make important decisions about users without human review. Activity and progress data supports educators and users in organising learning, providing feedback and offering timely assistance.

2.4. Technical, security and administrative data

- IP address and technical data routinely processed by the hosting provider or server for website delivery and security;
- browser and device type, date and time of access or sign-in, and session data;
- security logs required to detect errors, attempted misuse and unauthorised access;
- language preference stored in a functional cookie;
- data relating to purchased or assigned services, amounts, dates and payment status where required for service administration and financial records.

3. Purposes of processing

- responding to enquiries submitted through the contact form, email or telephone;
- discussing support for educators, participation by pupils and students, and potential cooperation with private schools, education centres, schools, universities and other institutions;
- creating, maintaining and protecting user accounts;
- assigning access according to the user's role and the relevant course or programme;
- organising live teaching, recordings, materials, digital books, worksheets, personal notes, communication and mentoring;
- monitoring activities and progress for feedback, support and improvement of the educational process;
- processing payments, administering services, maintaining business records and complying with legal obligations;
- ensuring security, preventing misuse, resolving technical issues and protecting the rights of users and Online Academy;
- improving functionality and content based on experience from real educational practice;
- sending promotional communications only where an appropriate legal basis exists and an opt-out option is provided.

4. Legal bases for processing

We process personal data only where an appropriate legal basis exists:

- performance of a contract or taking steps at the request of an individual before entering into a contract, for example when responding to an enquiry or providing access to a purchased course;
- compliance with a legal obligation, particularly in relation to business and financial records;
- legitimate interests in security, administration, support, dispute resolution and reasonable service improvement, after considering the impact on the rights and freedoms of individuals;

- **consent where required, for example for optional cookies, certain promotional communications or other voluntary features.**

5. Users under the age of 18

SmartClass may also be used by pupils under the age of 18. Where access is arranged by a parent, guardian, educator, private school, education centre or other organisation, the person responsible for involving the minor should provide the appropriate information and, where required, obtain consent or another valid authorisation.

We do not request more personal data from minors than is necessary for access to teaching, content, assignments, communication, security and monitoring of the educational process. Personal data is not used for advertising profiling.

A parent or guardian may contact us regarding the personal data of a minor. To protect the user, we may request confirmation of identity, parental status or other authority.

6. SmartClass Live, communication and recordings

SmartClass Live uses or may use a third-party video communication service integrated into the educational environment. During a class, the displayed name or username, image, voice, messages, screen content and content entered by a participant on the shared digital whiteboard may be processed.

A class is recorded only where there is a clear educational or organisational need and participants have been informed in advance. Where recording is enabled, users should understand that their voice, image, displayed name or contribution to the class may be included in the recording. Access to recordings is limited to authorised users and to a period appropriate to the purpose of the course or programme.

Messages, posts, questions, submitted work and other content may be visible to educators, administrators, mentors or members of the relevant group, depending on the feature in which the content is posted. Users should not publish personal data relating to others without a valid basis and genuine need.

7. Cookies and similar technologies

The website and platform currently use necessary and functional cookies required for sessions, authentication, security and storage of the selected language preference. Without these cookies, certain features, including sign-in and language selection, may not function correctly.

The contact form uses a session for a security token and protection against repeated or unauthorised submissions. This data is not used for advertising.

Analytics or marketing cookies will not be introduced without an appropriate notice and, where required, prior consent. If such tools are introduced, this Policy and the available cookie controls will be updated.

8. Recipients and service providers

We share personal data only where necessary to provide the service, protect the system, deliver a programme or comply with a legal obligation. Recipients may include:

- **providers of hosting, maintenance, backups and server infrastructure;**
- **Google, where a user signs in through Google OAuth or where business email communication is handled through Google services;**
- **the video communication provider supporting SmartClass Live, including Jitsi as a Service when enabled;**
- **educators, mentors, associates and administrators who require access to deliver a specific course or programme;**

- **private schools, education centres or other partner organisations only where they participate in a specific programme and an appropriate legal basis, agreement and allocation of responsibilities are in place;**
- **payment or accounting service providers where they are involved in processing a specific transaction or maintaining business records;**
- **competent authorities, courts or other persons where disclosure is legally required or necessary for the establishment, exercise or defence of legal claims.**

Online Academy does not sell personal data and does not disclose it to advertisers for their independent marketing purposes.

International transfers of personal data

Certain digital service providers may process personal data outside the Republic of Serbia. In such cases, we rely on safeguards provided by applicable law and the contractual terms of the relevant service provider. The scope of any transfer depends on the feature used, such as Google sign-in or video communication.

9. Retention periods

We retain personal data only for as long as necessary for the purpose for which it was collected, taking account of contractual, legal and security requirements. The retention period depends on the category of data:

- **enquiries submitted through the contact form and related communication are retained while the conversation remains active and for a reasonable period after the last communication, generally up to two years, unless the enquiry results in a contractual relationship or longer retention is necessary for a legal claim;**
- **account and assigned-access data is retained while the account or access remains active and afterwards for the period required for support, record-keeping and protection of legal claims;**
- **user-created learning content, assignments, notes, communication and progress data is retained for the duration of the course or programme and for the period during which access to the content is intended, unless the user requests earlier deletion and no other legal basis for retention applies;**
- **class recordings are retained for the period during which they are needed by participants in the relevant course or programme, after which they are deleted or archived with restricted access where a justified educational, contractual or legal need exists;**
- **security and server logs are retained for as long as necessary for security, diagnostics and prevention of misuse;**
- **financial and business documentation is retained for the periods prescribed by law.**

After the applicable retention period expires, personal data is deleted, anonymised or access to it is restricted. Retention periods may differ where a service is delivered with a partner and a different period is specified in a separate notice or agreement.

10. Data security

We apply technical and organisational measures appropriate to the nature of the data and the assessed risk, including HTTPS communication, password hashing, role-based access, limitation of administrative privileges, security checks, backups and measures designed to prevent unauthorised access.

No system can be entirely free of risk. Users should protect their access credentials, use a secure device and inform us without delay if they suspect unauthorised use of an account or another security incident.

11. Rights of data subjects

Depending on the circumstances and legal basis, you may request:

- **information about processing and access to your personal data;**
- **correction of inaccurate data and completion of incomplete data;**
- **deletion of personal data where the legal requirements are met;**
- **restriction of processing;**
- **objection to processing based on legitimate interests;**
- **data portability where applicable;**
- **withdrawal of consent at any time, without affecting the lawfulness of processing carried out before withdrawal;**
- **submission of a complaint to the Commissioner for Information of Public Importance and Personal Data Protection of the Republic of Serbia.**

Exercising your rights

Please send your request to onlineacademy.uprava@gmail.com. To protect personal data, we may request information necessary to confirm your identity or authority. We will respond without undue delay and within the period prescribed by law. Where a request is complex or a large number of requests has been submitted, the period may be extended in accordance with the law, and the applicant will be informed.

12. Automated decision-making and analytics

Online Academy does not currently make decisions that produce legal effects or similarly significantly affect a user solely through automated processing. Displays of activity, progress, completed assignments and other data may support educators and users, but they do not replace professional human judgement.

13. External links and third-party content

The website, SmartClass or learning materials may contain links to external services and educational resources. Once a user leaves our environment, the processing of personal data is governed by the privacy rules of the relevant provider. Before submitting data to a third party, users are encouraged to read its privacy policy.

14. Changes to this Privacy Policy

We may update this Policy when the functionality of the website or SmartClass environment, the manner of processing, service providers or applicable regulations change. A new version will be published with its effective date. We may additionally notify registered users through the platform or by email of significant changes that materially affect them. This document is an English translation of the Serbian-language Privacy Policy. In the event of any discrepancy, ambiguity or difference in interpretation, the Serbian-language version shall prevail.

15. Contact

For privacy questions, requests to exercise your rights or reports of a potential security incident, you may contact us at:

- **email: onlineacademy.uprava@gmail.com**
- **telephone: +381 64 277 09 83**
- **postal address: Kneginje Ljubice 2/15, 19000 Zaječar, Republic of Serbia**