
STEAM MINDS – DATA PRIVACY AND PROTECTION POLICY

Effective Date: 2023

Last Updated: 2024

1. PURPOSE AND COMMITMENT

At STEAM Minds, we recognize the importance of protecting the personal data of students, educators, and parents who engage with our educational platforms, applications, and services. As an EdTech company operating in Pakistan, we are committed to full compliance with applicable data privacy laws, including the Prevention of Electronic Crimes Act, 2016 (PECA 2016), sector-specific regulations, and the forthcoming Personal Data Protection Bill, 2023 (PDPB).

This policy outlines how STEAM Minds collects, processes, stores, protects, and shares personal data in line with Pakistan's legal framework and international best practices.

2. SCOPE

This policy applies to:

- All students, teachers, parents, and institutions using STEAM Minds' services in Pakistan.
- All personal, sensitive, and critical data collected through our websites, mobile apps, VR platforms, and other services.
- All employees, contractors, and third-party service providers who have authorized access to such data.

3. LEGAL FRAMEWORK IN PAKISTAN

STEAM Minds complies with the following laws and regulations:

1. PECA 2016

Governs unauthorized access, transmission, and misuse of personal data.

2. DRAFT PERSONAL DATA PROTECTION BILL, 2023

Provides a framework for consent, data subject rights, breach notifications, and cross-border transfers.

3. PTA Regulations & Rules (2021)

Governs online privacy, removal of unlawful content, and anti-spam compliance.

4. SECTOR-SPECIFIC LAWS IN

Including banking, and education-related confidentiality obligations.

4. DATA WE COLLECT

We may collect the following types of data:

- **Personal Data:** Names, phone numbers, email addresses, parent/guardian details.
- **Educational Data:** Student progress, course enrollments, assessments, and certifications.
- **Sensitive Personal Data:** Limited cases such as financial information, subject to explicit consent but encrypted.
- **Technical Data:** IP addresses, usage statistics, and cookies for system optimization.

We do not knowingly collect data from children under 18 years without parental consent.

5. PRINCIPLES OF DATA PROCESSING

All personal data at STEAM Minds is processed in accordance with the following principles:

- **Lawfulness and Consent:** No personal data is collected or processed without prior consent.
- **Purpose Limitation:** Data is collected only for specified educational and operational purposes.
- **Data Minimization:** Only data strictly necessary for service delivery is collected.
- **Accuracy:** Data is maintained accurately and updated when required.
- **Storage Limitation:** Data is retained only for as long as necessary to fulfill its purpose.
- **Integrity and Confidentiality:** Security measures are applied to prevent unauthorized access, alteration, or disclosure.

6. USE OF DATA

We use collected data for:

- Delivering and improving educational services.
- Managing user accounts and providing customer support.
- Ensuring compliance with regulatory requirements.
- Communicating updates, newsletters, and relevant educational content (with opt-out options).

7. SHARING AND DISCLOSURE

STEAM Minds does not sell or share personal data with third parties for marketing purposes. Data may only be shared:

- With explicit consent of the user or guardian.
- With service providers bound by confidentiality agreements (e.g., hosting or cloud services).
- With regulatory authorities or courts when legally required under PECA 2016 or other applicable laws.

8. CROSS-BORDER DATA TRANSFERS

- **Critical Personal Data:** Will be processed only within Pakistan (per PDPB 2023 requirements).
- **Other Data:** May be transferred outside Pakistan only if the destination country provides an equivalent level of protection.

9. DATA SUBJECT RIGHTS

In line with PDPB provisions, users have the following rights:

- Right to access personal data.
- Right to correct inaccurate data.
- Right to request deletion (right to be forgotten).
- Right to restrict or object to processing.
- Right to withdraw consent.
- **Requests may be submitted via: privacy@steamminds.org**

10. DATA SECURITY MEASURES

STEAM Minds employs:

- End-to-end encryption of sensitive data.
- Firewalls, intrusion detection systems, and regular vulnerability assessments.
- Role-based access controls for staff.
- Secure cloud storage with restricted access.
- Regular audits and compliance checks.

11. BREACH NOTIFICATION

In the event of a personal data breach:

- Affected users will be notified promptly.

- Regulatory authorities (once established under PDPB) will be informed within 72 hours where required.

12. CHILDREN'S DATA PROTECTION

We recognize the heightened sensitivity of children's data:

- Parental consent is mandatory before collecting any data from children under 18.
- Children's learning data will only be used for educational purposes.
- No child's data will be disclosed to third parties for marketing purposes.

13. ELECTRONIC MARKETING AND COMMUNICATIONS

- All promotional messages will include clear unsubscribe options.
- We comply with PECA Section 25 (anti-spam provisions).
- No user will receive marketing messages without prior consent.

14. ONLINE CONTENT AND SAFETY

- STEAM Minds complies with PTA's Removal and Blocking of Unlawful Online Content Rules, 2021.
- Harmful or unlawful content will be blocked or removed from our platforms.
- User reports of inappropriate content are handled with priority.

15. POLICY UPDATES

This policy may be updated from time to time to reflect changes in law or our practices. The latest version will always be available on our website.

16. CONTACT INFORMATION

For privacy-related inquiries or complaints, please contact:

STEAM Minds – Data Protection Cell

Email: privacy@steamminds.org

Contact CEO: mehtab@steamminds.org