



Privacy Policy

Effective Date: 06/07/2026

IMPORTANT NOTICE: INSTITUTIONAL SCHOOL SERVICES EXEMPTION

This Privacy Policy applies strictly and solely to visitors of our public marketing website (<https://bykidstokids.com> used for general marketing, informational purposes, and business-to-business inquiries).

This policy **DOES NOT** apply to the authenticated educational platforms, applications, or student environments of **Creating Together** (<https://create.bykidstokids.com>) or **AnimaPIC** (<https://animapic.bykidstokids.com>) when accessed through school-issued credentials or anonymous access tokens.

For schools, municipalities, and institutional partners:

1. **Zero Student Personal Data Collection:** Within our educational applications, we do not collect, store, or process personal data, behavioral tracking cookies, or profiling identifiers of student users. Student interactions are built entirely on anonymous pedagogical workflows.
2. **Institutional Governance & Processor Role:** All data processing within our educational applications is governed strictly by the respective school's or municipality's bilateral **Data Processing Agreement (DPA)** and our dedicated **Institutional Platform Privacy Policy**. Under applicable regional laws, the school/municipality remains the Data Controller, and we act strictly as a Data Processor operating under their written instructions.
3. **Regional Data Sovereignty & Local Hosting:** All institutional data, regardless of the user's country of residence, is transferred, hosted, and processed on secure cloud infrastructure located strictly within the **EU/EEA** in compliance with the **GDPR**.

To review our compliance framework for schools, please access our **Institutional Platform Privacy Policy** at:

- **Creating Together:** <https://create.bykidstokids.com/privacypolicy>
- **AnimaPIC:** <https://animapic.bykidstokids.com/privacypolicy>

, or refer to your institution's bilateral Data Processing Agreement (DPA).

1. Introduction

By Kids To Kids Oy Ltd ("BKTK", "we," "us," or "our") respects your privacy and is committed to protecting the personal data of visitors to our public marketing website. This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you visit <https://bykidstokids.com> (the "Site").

If you do not agree with the terms of this Privacy Policy, please do not access the Site.



2. Information We Collect

When you interact with our public Site, we may collect the following types of information:

2.1. Personal Data You Provide Voluntarily

We may collect personal data that you voluntarily provide to us when expressing an interest in obtaining information about us or our products, participating in activities on the Site, or contacting us directly. This may include:

- **Contact Information:** Name, email address, phone number, organization name, and job title (e.g., when you fill out a "Contact Us" form or request a sales demonstration).
- **Communications:** Records of your correspondence with us if you contact us via email or other channels.

2.2. Information Collected Automatically

When you navigate through and interact with our Site, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns. This information is primarily used to maintain the security and operation of our Site, and for our internal analytics and reporting purposes. This may include:

- **Log and Usage Data:** IP address, browser type, operating system, referring URLs, pages viewed, and the dates/times of your visits.
- **Device Data:** Information about the computer, phone, or tablet you use to access the Site.
- **Location Data:** Approximate location derived from your IP address.

2.3. Cookies and Tracking Technologies

We may use cookies, web beacons, and similar tracking technologies to access or store information. You can set your browser to refuse all or some browser cookies or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of the Site may become inaccessible or not function properly.

Note: As stated in the Exemption Notice above, these commercial tracking technologies are NEVER used within our authenticated educational platforms (Creating Together and AnimaPIC).

3. How We Use Your Information

We use the information we collect or receive for the following legitimate business purposes:

- **To Respond to Inquiries:** To answer your questions, fulfill your requests, and provide you with information regarding our institutional services.
- **Marketing and Communications:** To send you promotional materials, newsletters, and other information related to our business-to-business offerings, provided you have opted in to receive such communications (where required by law). You may opt out at any time.



- **Site Improvement and Analytics:** To analyze trends, administer the Site, track users' movements around the Site, and improve the overall user experience.
- **Security and Fraud Prevention:** To protect our Site and our business from malicious activity.
- **Legal Compliance:** To comply with legal obligations and respond to lawful requests from authorities.

4. Disclosure of Your Information

We do not sell your personal data. We may share your information in the following limited situations:

- **Service Providers:** We may share your data with third-party vendors, service providers, contractors, or agents who perform services for us or on our behalf (e.g., website hosting, email delivery, analytics). These third parties are bound by confidentiality obligations.
- **Business Transfers:** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Legal Requirements:** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process.

5. International Data Transfers

As an international company, the data we collect via this marketing Site may be transferred to, stored, and processed in countries other than the one in which you reside, including Brazil and the European Union. We ensure that appropriate safeguards are in place to protect your personal data in accordance with applicable data protection laws, such as the GDPR and the LGPD.

6. Data Security

We have implemented reasonable technical and organizational security measures designed to protect the security of any personal data we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure.

7. Data Retention

We will only keep your personal data for as long as it is necessary for the purposes set out in this Privacy Policy, unless a longer retention period is required or permitted by law.

8. Your Privacy Rights

Depending on your jurisdiction (such as the EU/EEA under the GDPR or Brazil under the LGPD), you may have certain rights regarding your personal data, which may include the right to:



- Request access to and obtain a copy of your personal data.
- Request rectification or erasure of your personal data.
- Restrict the processing of your personal data.
- Object to the processing of your personal data.
- Data portability.

To exercise these rights, please contact us using the details provided below.

9. Changes to this Privacy Policy

We may update this Privacy Policy from time to time to reflect changes to our practices or for other operational, legal, or regulatory reasons. We will notify you of any material changes by posting the updated policy on this page with a new "Effective Date."

10. Contact Us

If you have questions or comments about this Privacy Policy, please contact our Data Protection Officer (DPO) at:

By Kids To Kids Oy Ltd

Address: Azorienkuja 1 C 56, 00220 Helsinki, Finland

Email: dpo@bykidstokids.com