



Privacy & Data Protection Policy

The Arctic Lighthouse AR Educational Game

Effective Date: 10th August 2024



Important Notice – Pre-Launch Status

This Privacy & Data Protection Policy has been prepared in anticipation of the public release of The Arctic Lighthouse. While a proof of concept (POC) has been piloted with partner institutions and a playable prototype has been developed with support from the Unity for Humanity Grant and the Government of Brazil, the Game has not yet been commercially launched. This Policy outlines the framework that will apply once the Game is made available and will be updated accordingly prior to release.

1. Introduction

Welcome to *The Arctic Lighthouse*, an immersive Augmented Reality (AR) game designed to empower primary and secondary students to imagine sustainable futures and take action on climate challenges.



This Privacy & Data Protection Policy explains how **Platô (Brazil)** and **The Necessary Space (UK)** (collectively “**we**,” “**our**,” or “**us**”) collect, use, store, and share information in connection with your use of the Game and its associated platforms (the “**Game**”).

The Arctic Lighthouse is primarily implemented in educational contexts (primary, secondary, and non-formal learning). **Educational institutions, cultural organizations, and NGOs act as administrators** and are responsible for obtaining all necessary parental or legal guardian consents before students (the “**players**”) participate and before any data is collected.

2. Information We Collect

a. User-Generated Content (UGC)

Players create content such as digital “books,” “videos,” and reflections. This may include text, images, and photos captured during geolocated missions.

With verified consent, this content becomes part of the **Impossible Library** — an open-source digital repository designed to amplify youth voices globally.

b. Geolocation Data

- The Game uses geolocation features to enable real-world, location-based AR missions (“pins”). These pins are defined by administrators, typically within or near the institution environment (e.g., school, cultural institution, NGO), to ensure safety and educational relevance.
- Players visit these designated locations, capture a photo, and upload it as part of their mission. Each photo becomes a page in the student’s digital “Book,” which is later shared in the open-source **Impossible Library**.
- Other players can view these books, including the photos associated with the pins, as part of the collaborative storytelling experience.
- Geolocation data is processed only for mission verification and is not used for continuous personal tracking beyond active gameplay sessions.

c. Usage Data & Analytics

KPI analytics tools within the Game track user behavior and impact indicators. This includes:



- **Real-world activities** completed by students.
- **Activities posted by teachers** to guide gameplay.
- **Geolocation data points** — number of real-world locations visited through missions.
- **Frequency of engagement with game resources.**
- **Gameplay behavior** — time spent playing, tasks completed, learning progression, and areas of interest.

In addition, data is collected for the purpose of measuring **educational and climate impact**, including:

- **Subscription data** — database pool, number of subscribers, and demographics.
- **Engagement scale** — number of students engaging with the Game, content created, and indicators of changes in knowledge, attitudes, and behaviors (through in-game surveys and AI-enabled tools to track impact outputs).
- **Sustained engagement** — number of active users, subscriptions, retention rate, return frequency, and task completion.
- **Impact actions** — quantity of user-generated content and number of real-world initiatives initiated by players.
- **Diversity and demographics** — profiles of players contributing to the global community.

This information is collected to improve game design, measure learning outcomes, and assess the broader social and climate impact. Data is aggregated, anonymized, or de-identified wherever possible, particularly for reporting and research.

d. School and Educator Data

- Includes teacher account information, curriculum integration data, and classroom-level learning progress.
- Enables teachers to track student participation, provide feedback, and align with school curricula.

e. Account & Profile Data



- Each participating teacher receives an **administrator login** to create and manage classes, configure missions (pins), and oversee student activity.
 - Each student receives a **personal login** to save progress, build their digital book, and track achievements across gameplay sessions.
 - Account data typically includes a username, encrypted password, and progress logs tied to the educational experience.
 - This data is stored securely and used solely for enabling gameplay continuity, saving learning progress, and supporting student customization.
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3. How We Use Information

- **Game Delivery** – To operate, maintain, and improve the Game.
 - **Learning Outcomes** – To support skill development (21st-century skills, climate literacy, socio-emotional learning) and curriculum integration (BNCC, SDGs, IDGs).
 - **Impact Measurement** – To evaluate environmental, social, and educational outcomes through aggregated and anonymized research and reporting.
 - **Educator Support** – To enable dashboards, analytics, and training resources for teachers.
 - **Research & Development** – To contribute anonymized data to research on education, climate action, and learning innovation.
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4. Information Sharing

We may share information under the following circumstances:

- **Public UGC** – Student-created content, once consented, is published in the Impossible Library (open-source repository inside the Game).
- **Project Partners** – Shared with Platô Cultural and The Necessary Space to ensure development, delivery, and improvement of the Game.
- **Schools & Educators** – Impact and progress data is shared with participating schools to support pedagogy and curriculum development.
- **Legal Requirements** – If required by law, court order, or regulatory authority.
- **Aggregated Data** – De-identified data may be shared for research, analytics, or reporting.



5. Data Security

We apply **industry-standard technical and organizational measures** to protect collected information. Our infrastructure is hosted securely on **Amazon Web Services (AWS)** with access restricted to authorized personnel only.

6. Data Retention

- Data is retained only for as long as necessary to fulfill educational and operational purposes, unless a longer retention period is legally required.
 - UGC published to the Impossible Library is preserved for long-term public access as part of its open-source mission.
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7. Children's Privacy

The Arctic Lighthouse is designed for learners aged **8–17**. We comply with applicable children's privacy frameworks, including **GDPR-K (EU)**, **COPPA (US)** and **LGPD (Brazil)**.

- **Consent** – For children below the digital age of consent, we rely on schools to obtain verifiable parental/legal guardian consent.
Data Minimization – We only collect the minimum necessary data to deliver the educational experience.
 - **Safeguarding** – We collaborate with schools to ensure compliance with child protection and safeguarding protocols.
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8. Your Rights

Depending on your jurisdiction, you may have the right to:

- Access your personal data.



- Correct or update inaccurate information.
- Request deletion of your data (“right to be forgotten”), subject to limitations (e.g., published open-source UGC).
- Restrict or object to processing.
- Request a copy of your data in portable format.

Requests can be directed to the relevant school administrator or directly to us.

9. Policy Updates

We may revise this Privacy Policy periodically. Any changes will be posted here with an updated **Effective Date**. We encourage users, schools, and parents to review it regularly.

10. Contact Us

For questions or concerns about this Policy:



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