



IMTLazarus - RGPD/LOPD-GDD

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Introduction

This document is addressed to the legal departments and Data Protection Officers (DPO / LOPD) of our clients. It compiles information regarding risk mitigation, traceability, data sovereignty, and strict compliance with the GDPR/LOPD-GDD¹ on the *IMTLazarus* platform.

1. Where is the information hosted?

This is our first and primary concern. On this point, we are blunt and transparent:

- **100% European Sovereignty:** The *IMTLazarus* infrastructure is supported by OVHcloud², which is a leading French cloud services company in Europe. It is important to note that OVHcloud holds ISO/IEC 27001, 27017, and 27018 certifications and reports, and additionally offers standard Anti-DDoS protection.
- **Exact physical location:** The data centers are located in France (specifically and physically in Strasbourg and Gravelines).
- **Absence of international transfers:** Being a European company and hosting data on European Union soil, it strictly complies with the GDPR and the Spanish LOPD.

¹ El RGPD (Reglamento General de Protección de Datos) es la norma europea vigente desde 2018 que armoniza la protección de datos en la UE. En España, se complementa con la LOPDGDD (Ley Orgánica 3/2018), que adapta el RGPD, deroga la antigua LOPD de 1999 y regula derechos digitales. Ambas normativas son de obligado cumplimiento conjunto.

Claves del Marco Legal de Protección de Datos en España:

RGPD (Reglamento Europeo): Aplicable directamente desde 2018 a cualquier empresa que trate datos de residentes en la UE, exigiendo consentimiento expreso y estableciendo multas de hasta 20 millones o el 4% de la facturación global.

LOPDGDD (Ley Española - LOPD 3/2018): Es la adaptación nacional que concreta aspectos del RGPD, regula los derechos digitales y deroga la anterior LOPD 15/1999.

Principales novedades: Introduce la figura obligatoria del Delegado de Protección de Datos (DPO) en ciertos casos, refuerza los derechos del usuario (acceso, rectificación, supresión, portabilidad) y exige el consentimiento explícito.

Adaptación: Las empresas deben realizar un análisis de riesgos, llevar un registro de actividades, informar claramente a los usuarios y proteger los datos desde el diseño.

² <https://www.ovhcloud.com/>

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There are no conflicts with US regulations (such as the CLOUD Act³) that often cause headaches for DPOs when using American clouds, completely avoiding problems derived from international data transfers.

2. Roles under the LOPD (Who owns the data)

Our clients' legal departments must be clear about the platform's legal role:

- **The School is the "Data Controller":** The educational center is always the absolute owner of the students' data. The school decides which policies are applied and what level of logging or monitoring is to be maintained.
- **IMTLazarus is the "Data Processor":** *IMTLazarus* only processes information on behalf of the school to provide the service. *IMTLazarus* does not commercialize, transfer, or exploit students' data for any purpose of its own or third parties.
- **Information collection:** Only and exclusively the strictly necessary information is collected to guarantee digital security and educational control (data minimization: IP, browsing history, device use).

3. Privacy by Design

IMTLazarus is designed with privacy as a basic rule:

- **Strict boundary between school and family spheres:** In *IMTLazarus*, an exact school calendar and schedule are configured. Outside of those school hours, **NO ONE** at the school has access to the management, monitoring, or information of the device. This guarantees the minor's right to privacy in their family environment.

³ La CLOUD Act (Clarifying Lawful Overseas Use of Data Act) es una ley federal de Estados Unidos aprobada en 2018 que permite a las autoridades estadounidenses exigir a empresas tecnológicas estadounidenses que entreguen datos y comunicaciones de usuarios, sin importar si dichos datos están almacenados en servidores dentro o fuera de EE. UU.

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- **Outside school hours, control rests with the parents, decoupling the school's responsibility when the student is at home and guaranteeing the family's privacy from the institution.**

4. Information Security

- **Private Cloud:** To provide the service, IMTLazarus uses a mixed/private cloud modality, where independent and isolated networks are created for clients within a high-availability platform. Information always travels and is stored encrypted and is carried out through encrypted connections using standard port 443 and via WebSocket connections.
- **Clear data retention policies:** browsing information is kept during the school year to comply with tracking and incident requirements, and can be audited or deleted according to the school's protocols.

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Additional information

Privacy by design as an obligation and core architecture

The concept of Privacy by Design has evolved from a theoretical suggestion to an inescapable legal and technical obligation under frameworks such as the GDPR.

IMTLazarus adopts this premise by integrating security into its core or "DNA" from the design phase, avoiding the use of later "patches".

This philosophy is supported by the principle of Privacy by Default, which establishes data protection as the default value to guarantee the rights of the most vulnerable users: students. A differentiating element is the strict separation of spheres, under the maxim of "Two worlds, the same protection". This ensures that educational centers only access information from the school environment, while families maintain exclusive control at home.

Technical characteristics and data security

To support its architecture, the platform implements various technical tools covering the entire information lifecycle:

- **Total Encryption:** Use of SHA-256 for data at rest and advanced TLS for data in transit.
- **Pseudonymization:** Decoupling user identity from their behavioral data.
- **Data Minimization:** Collection only of strictly necessary information, eliminating superfluous telemetry.
- **Traceability:** Generation of immutable audit logs to facilitate regulatory compliance before the DPO.
- **Global Compliance:** Architecture designed to adapt natively to the privacy laws of the various countries where it operates.

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Strategic and Competitive Benefits

Adopting a solution with Privacy by Design offers advantages that go beyond simple legal compliance:

- **Risk Reduction:** Minimizes financial and reputational impact by avoiding unnecessary data collection and preventing multi-million dollar fines.
- **Regulatory Agility:** Facilitates the conduct of Impact Assessments (DPIA), reducing friction between legal and technical departments.
- **Elimination of Technical Debt:** As a native privacy system, IMTLazarus scales naturally without requiring the patches or custom developments that "legacy" systems need.

The commitment of *IMTLazarus* to designing privacy from scratch represents a smart investment in the long-term sustainability and security of educational institutions, ensuring that the digital well-being of the community starts with the protection of its future.

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Additional certifications

Indicate that the *IMTLazarus* platform has passed the Data Protection Impact Assessment (DPIA), in compliance with the provisions of Article 35 GDPR, ensuring that our platform is considered capable of achieving said purpose (December 2024) while equally guaranteeing the privacy of the interested parties. This evaluation has been carried out by a third party.

Likewise, *IMTLazarus* holds a declaration of conformity with the National Security Scheme (February 2025), having passed the self-assessment process in accordance with the requirements of Royal Decree 311/2022.