

SuhuruSara.lk

Privacy and Personal Data Protection Policy

Effective Date: 01 April 2026

SuhuruSara.lk (“SuhuruSara”, “we”, “our”, or “us”) is an e-learning platform operated under Foundation.lk, the social empowerment initiative of LK Domain Registry. We are committed to protecting personal data in accordance with the Personal Data Protection Act, No. 9 of 2022 of Sri Lanka, as amended, and applicable guidelines issued by the Data Protection Authority of Sri Lanka (“PDPA”).

1. Purpose of This Policy

This Policy explains:

- What personal data we collect
- Why and how we process personal data
- The lawful bases for processing
- Duration of which we retain personal data
- The rights of individuals
- How to contact us regarding personal data matters

2. Scope

This Policy applies to personal data collected through:

- <https://www.suhurusara.lk>
- <https://lms.suhurusara.lk>
- Online courses, assessments, webinars, and workshops
- Registration forms and surveys
- Email, WhatsApp, and support channels
- Payment gateways and certificate request forms

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3. Definitions

- Personal Data means any information relating to an identifiable individual.
- Processing includes collection, recording, storage, use, disclosure, and deletion.
- Data Subject means the individual to whom the personal data relates.
- Controller means the organization that decides why and how personal data is processed.

4. Data Controller

Foundation.lk, operating SuhuruSara.lk, acts as the Data Controller for the personal data processed through the platform.

5. Personal Data We Collect

5.1 Identification and Contact Data

- Full name
- Email address
- Mobile or WhatsApp number
- Date of birth
- Gender (optional)
- Address (when printed certificates are requested)
- District, city, and country

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5.2 Educational and Professional Data

- School, organization, or institution
- Occupation and designation
- Course enrollments and completion records
- Assessment/Quiz submissions, grades, and certificates
- Attendance and participation records

5.3 Technical Data

- IP address
- Browser type and device information
- Login timestamps
- Activity logs
- Cookies and session identifiers

5.4 Financial and Transaction Data

- Payment status and transaction references for paid courses
- Billing information where required

5.5 Feedback and Survey Data

- Course evaluations
- Impact assessments
- Testimonials and qualitative responses

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6. Special Categories of Personal Data

We do not intentionally collect sensitive personal data unless necessary and permitted by law or with explicit consent.

7. Lawful Bases for Processing

We process personal data on one or more of the following bases:

- Consent
- Performance of a contract
- Compliance with legal obligations
- Legitimate interests related to educational service delivery
- Protection of vital interests, where applicable

8. Purposes of Processing

We process personal data to:

- Create and manage user accounts
- Deliver courses and assessments
- Track learning progress
- Generate and verify certificates
- Process payments
- Provide learner support
- Communicate course updates
- Improve our services
- Produce aggregated reports for donors and stakeholders
- Comply with legal and regulatory obligations
- Protect the security and integrity of our systems

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9. Consent

Where consent is required, we will obtain it through clear affirmative action.

Users may withdraw consent at any time; however, withdrawal does not affect processing already carried out lawfully.

10. Children and Young Persons

Our courses are primarily intended for individuals aged 16 years and above.

Where a participant is under 16 years of age, we may require verifiable consent from a parent or legal guardian before creating an account or enrolling in a course.

11. Privacy Notices and Checkboxes

During account creation, users should be asked to:

- Accept the Privacy Policy
- Accept the Terms of Use
- Confirm they are at least 16 years old, or that parental/guardian consent has been obtained
- Consent to receive course-related communications
- Optionally consent to receive marketing communications

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12. Data Sharing and Disclosure

We do not sell or rent personal data.

We may share personal data with:

- Authorized staff and accredited trainers
- Technology service providers (e.g., Moodle, WordPress, hosting providers, Vimeo, Zoom, payment gateways)
- Auditors, funders, and partners in anonymized or aggregated form
- Government authorities and regulators where legally required

13. Cross-Border Transfers

Some service providers may process data outside Sri Lanka.

We will ensure appropriate safeguards are in place before transferring personal data internationally.

14. Data Retention

We retain personal data only for as long as necessary for the purposes stated in this Policy.

Typical retention periods include:

- Account and learning records: while the account remains active and for a reasonable period thereafter
- Certificates and verification records: long-term for authenticity and verification
- Financial records: as required by applicable law
- Marketing preferences: until consent is withdrawn

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15. Data Security

We implement appropriate technical and organizational measures, including:

- Encrypted passwords
- Secure hosting environments
- Access controls and role-based permissions
- Regular updates and security monitoring
- Backup and disaster recovery procedures
- Staff awareness and confidentiality obligations

16. Personal Data Breaches

If a personal data breach occurs, we will:

- Investigate and contain the incident
- Assess the risk to affected individuals
- Notify the Data Protection Authority and affected individuals where required by law
- Take corrective and preventive actions

17. Individual Rights

Subject to applicable law, individuals may request to:

- Access their personal data
- Correct inaccurate or incomplete data
- Erase data in certain circumstances
- Restrict processing
- Object to processing
- Withdraw consent
- Receive a copy of their data where applicable
- Lodge a complaint with the Data Protection Authority of Sri Lanka

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18. Data Deletion Requests

Users may request deletion of their personal data by contacting us.

We may retain certain records where necessary for:

- Legal compliance
- Certificate verification
- Fraud prevention
- Legitimate organizational interests

19. Analytics

We use cookies and similar technologies to:

- Maintain secure login sessions
- Remember preferences
- Measure website and course usage
- Improve user experience
- Users may control cookies through their browser settings, although some features may not function correctly if cookies are disabled.

20. Automated Decision-Making

We do not use automated decision-making that produces legal or similarly significant effects.

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21. Third-Party Services

We may use third-party platforms such as:

- Moodle
- WordPress
- Sampath IPG
- Vimeo
- Zoom
- Email delivery providers
- These providers process data under contractual and security safeguards.

22. Policy Updates

We may update this Policy from time to time.

The latest version will always be published on our website with the revised effective date.

23. Contact Details

SuhuruSara Team

Website: <https://www.suhurusara.lk>

Email: inquiries@suhurusara.lk