

### **Scope**

This privacy notice applies to any PRIVASY.eu website (including, but not limited to, <https://privacy.eu>, <https://22academy.com>), application, service, or tool (collectively "Services") where this privacy notice is referenced, regardless of how you access or use them, including through mobile devices.

It also applies to any other communication we may have with you.

We do not knowingly attempt to solicit or receive information from children.

We do not discriminate against any consumer based on the exercise of their consumer rights.

### **Personal information we collect**

If you are a training participant or employee of an organisation with which PRIVASY.eu has an agreement, your employer (or other third party paying for training) might supply us with your (business) contact information: name, email address, physical (business) address and phone number. Some employers also provide additional identifying information such as an employee ID number. We do not ask for nor do we process sensitive personal information.

If you are purchasing a training course, trial exam or other product or service for yourself or interacting with our Services without being a training participant, we collect the contact information you provide.

In interacting with our Services, we collect IP address and data associated with cookies. We will also generate information about your use of the services, including creating a temporary record of your training course and/or trial exam.

We do not consider personal information to include information that has been anonymized or aggregated so that it can no longer be used to identify a specific natural person, whether in combination with other information or otherwise.

### **Personal information you give us when you use our Services or register for an account with us**

- Identifying information such as your name, addresses, telephone number(s) or email address(es) when you register for an account with us;
- Other content that you generate, or that is connected to your account (such as course attendance, course progress, trial exam results and user preferences);
- Postage, billing and other information used to purchase or send course materials, invoices, and other information;
- You may also provide us other information through a web form, by updating or adding information to your account, through your participation in community discussions, member-to-member communications, chats, dispute resolution, or when you otherwise communicate with us regarding our Services;

- Additional information we are required or authorized by applicable national laws to collect and process in order to authenticate or identify you or to verify the information we have collected.

### **Personal information we collect automatically when you use our Services or register for an account with us**

We collect information about your interaction with our Services. This is information we receive from devices (including mobile devices) you use when you access our Services. This information could include the following: Device ID or unique identifier, device type, and unique device token;

Computer and connection information such as statistics on your page views, traffic to and from the sites, referral URL, ad data, your IP address, your browsing history, and your web log information.

### **Personal information we collect using cookies and similar technologies**

We use cookies, web beacons, unique identifiers, and similar technologies to collect information about the pages you view, the links you click, and other actions you take when using our Services, within our websites, advertising or email content.

### **Personal information collected from other sources**

As described above, we collect contact information from employers and other third parties who make purchases on your behalf;

We may supplement the personal information we collect directly with information collected from third parties and add it to your account information. For example, we collect and use demographic and other information that is publicly available in an applicable jurisdiction;

### **Social Media**

We allow you to share information with social media sites, or use social media sites to create your account (once this option is available) or to connect your account with the respective social media site. **Those social media sites may give us automatic access to certain personal information retained by them about you** (e.g., content viewed by you, content liked by you, and information about the advertisements you have been shown or have clicked on, etc.). You control the personal information you allow us to have access to through the privacy settings on the applicable social media site and the permissions you give us when you grant us access to the personal information retained by the respective social media site about you. By associating an account managed by a social media site with your account and authorizing us to have access to this information, you agree that we can collect, use and retain the information provided by these social media sites in accordance with this privacy notice. We may also use plug-ins or other technologies from various social media sites. If you click on a link provided via a social media plug in, you are voluntarily establishing a connection with that respective social media site.

## **When information is collected**

We collect information when you register for and use the Services. We also collect personal information from you and any devices (including mobile devices) you use when you: use our Services, register for an account with us, provide us information on a web form, update or add information to your account, provide us information at a tradeshow or other event, or when you otherwise correspond with us.

We also collect information when orders are placed from the party making the order. This information is typically provided by an employer, but may be provided directly by you or another third party purchasing services on your behalf.

## **Your choices about how we use your personal information**

We endeavour to provide you with choices about how we use your personal information to communicate with you, to send you marketing information, and how we provide you with individualized Services and relevant information. There are some instances, however, where the processing of your information may be limited or determined by others. If your data was provided to us by your employer (or other party paying for our Services on your behalf), we will process the data based on the legitimate interests of your employer in having us provide Services to you in the context of that relationship. We may also process your personal information with regard to our legitimate interest in compliance and maintaining business records. **You have a right to object to the processing of your personal information in these circumstances by contacting us at [info@privacy.eu](mailto:info@privacy.eu).**

## **How we use your personal information**

We use your personal information to provide and improve our Services, provide you with a personalized experience in using our Services, contact you about your account and our Services, provide you customer service, provide you with personalized advertising and marketing, and to detect, prevent, mitigate and investigate fraudulent or illegal activities.

If we received your personal information from an employer in connection with the provision of Services, we will use that information to communicate with you and provide the Services. We may also provide information about your use of the Services to your employer.

Information about Services provided to a specified individual may appear in invoices and other financial records. We may also process and retain personal information for purposes of compliance with laws and regulations.

## **Ways you can access, control, and correct your personal information**

We respect your right to access, correct, request deletion or request restriction of our usage of your personal information as required by applicable law. We also take steps to ensure that the personal information we collect is accurate and up to date.

- You have the right to know what personal information we maintain about you;

- We will provide you with a copy of your personal information in a structured, commonly used and machine-readable format on request;
- If your personal information is incorrect or incomplete, you have the right to ask us to update it;
- You have the right to object to our processing of your personal information;
- You can also ask us to delete or restrict how we use your personal information, although this right is determined by applicable law and may impact your access to some of our Services.

### **How we might share your personal information**

We may disclose your personal information to other members of the PRIVASY.eu corporate group or to third parties. This disclosure may be required for us to provide you access to some of our Services, to comply with our legal obligations, to enforce our Terms & Conditions or other agreements, to facilitate our marketing and advertising activities, or to prevent, detect, mitigate, and investigate fraudulent or illegal activities related to our Services and otherwise comply with the law. We attempt to minimize the amount of personal information we disclose to what is directly relevant and necessary to accomplish the specified purpose.

We do not sell, rent, or otherwise disclose your personal information to third parties for their marketing and advertising purposes without your consent.

More specifically:

- We may provide personal information to others as directed by you;
- We may provide personal information to third-party postal carriers and couriers to deliver courseware and other pertinent communication;
- We may provide personal information to employers or other parties providing funding for Services;
- We may provide personal information to third parties contracted by us for printing and distribution of course materials and other relevant information;
- We may provide personal information as necessary to comply with local laws, such as third-party screening for export compliance;
- We may provide personal information to course instructor(s) and/or delivery partner personnel involved in the delivery of Services in order to verify attendance, provide supplemental materials, or to communicate with or mentor students with regard to their enrolled or past courses;
- We may provide personal information to third-party platform providers in association with virtual course delivery and remote labs;
- For students taking third-party-authorized courses we may provide personal information to the authorizing party to verify enrolment and/or attendance;
- We may provide personal information to third-party companies providing invoicing and/or marketing services;
- We may provide personal information to third-party companies providing quality control services and/or conducting course satisfaction or other surveys.

### **How we store your personal information**

PRIVASY.eu utilizes cloud technologies for the hosting of data within the European Union, which means we store your personal data on our remote server in that region, specifically in Germany, Romania and the Netherlands.

### **How long we keep your personal information**

We retain your personal information for as long as necessary to provide the Services, or for other essential purposes such as maintaining financial and tax records, complying with our legal obligations, resolving disputes, and enforcing our policies.

### **How we protect your personal information**

We protect your personal information using technical and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure and alteration. Some of the safeguards we use are firewalls and data encryption, access controls to our data centres, and information access authorization controls.

### **Cookies & Similar Technologies**

When you visit or interact with our sites, services, applications, tools or messaging, we or our authorized service providers may use cookies and other similar technologies to help provide you with a better, faster, and safer experience, and for advertising and marketing purposes.

#### **What are cookies?**

Cookies are small text files containing a string of characters that can be placed on your computer or mobile device that uniquely identify your browser or device.

#### **What are cookies used for?**

Cookies allow a site or service to know if your computer or device has visited that site or service before. Cookies can then be used to help understand how the site or service is being used, help you navigate between pages efficiently, help remember your preferences, and generally improve your browsing experience. Cookies can also help ensure marketing you see online is more relevant to you and your interests.

#### **What types of cookies do PRIVASY.eu and 22Academy.com use?**

There are generally three categories of cookies: "Necessary", "Performance", and "Preference". PRIVASY.eu uses all three categories of cookies in connection with its web-based Services. This applies to all websites of PRIVASY.eu, including 22Academy.com. Our Cookie notice, which will

appear when opening the website, will give you current information about the type of cookies we use at that time.

- *Necessary Cookies.* These cookies are essential, as they enable you to move around the Services and use important features, such as accessing your profile or purchasing a product.
- *Performance Cookies.* These cookies collect information about how you have used the Services. For example, these cookies are used to tell us that you previously visited our websites so we can make it easier to find content you viewed before. We also use cookies to track aggregate Service usage and experiment with new features and changes to the Services. The information collected is used to improve how the Services work. These cookies allow us to remember how you're logged in, your preferences, and other information about your use of the Services. They allow us to tailor the Services to provide enhanced features and content for you. The information that is collected is not used to track your browsing activity on other sites or services.
- *Preference Cookies.* PRIVASY.eu, 22Academy.com and our third-party partners may use these types of cookies to deliver content that is relevant to your interests. These cookies can remember that your device has visited a site or service, and may also be able to track your device's browsing activity on other sites or services other than on the PRIVASY.eu Services. This information may be shared for the purpose of providing aggregate usage statistics and testing of the Service.

### **How long will cookies stay on my device?**

The length of time a cookie will stay on your computer or mobile device depends on whether it is a "persistent" or "session" cookie. Session cookies will only stay on your device until you stop browsing. Persistent cookies stay on your computer or mobile device until they expire or are deleted.

### **First and third-party cookies**

First-party cookies are cookies that belong to PRIVASY.eu, third-party cookies are cookies that another party places on your device through the Services. Third-party cookies may be placed on your device by someone providing a service for PRIVASY.eu, such as virtual classroom connectivity.

### **How to control and delete cookies**

Most internet browsers are initially set up to automatically accept cookies. If you do not want our Services to store cookies on your device, you can change your browser settings so that you receive a warning before certain cookies are stored. You can also adjust your settings so that your browser refuses most of our cookies or only certain cookies from third parties. You can also withdraw your consent to cookies by deleting the cookies that have already been stored.

The first time when you access our websites, you will have the choice to accept or decline the use of performance cookies and preference cookies. There is no choice to decline necessary cookies, because these cookies are needed to have a functioning website.

If you disable the cookies that we use, this may impact your experience while using the Services, for example you may not be able to access certain functionalities of the Services or you may not receive

personalized information. However, PRIVASY.eu tries to give you the best experience with the least amount of cookies.

If you use different devices to view and access the Services (e.g., your computer, smartphone, tablet) you will need to ensure that each browser on each device is adjusted to suit your cookie preferences. The procedures for changing your settings and cookies differ from browser to browser. If necessary, you can use the help function in your browser.

Last updated: September 9, 2022

PRIVASY.eu is registered in the Netherlands  
Chamber of Commerce 76779246 – info@PRIVASY.eu – +31612889773