

Privacy Statement Studytube

Studytube B.V. ("Studytube") offers an online, automated system that serves as a learning platform ("Platform"), providing access to knowledge, courses, training, and other forms of learning. Please refer to our Terms of Use (www.studytube.nl/gebruiksvoorwaarden-klanten) for a full description.

This Privacy Statement explains how Studytube processes your personal data when acting as a *Data Controller* within the meaning of the General Data Protection Regulation ("GDPR"). We are committed to protecting your privacy and processing your data in a transparent, secure, and lawful manner. This document outlines what personal data we collect, why we collect it, how we use and protect it, and what rights you have regarding your personal data.

Role of Studytube under the GDPR

The role of Studytube varies depending on the processing activity. This Privacy Statement applies only to processing operations where Studytube acts as a *Controller*. This means that Studytube determines the purposes and means of the processing of personal data.

When we process personal data on behalf of our customers, we act as a *Processor* and only process data according to the customer's documented instructions. In that case, our responsibilities are defined in the *Data Processing Agreement* between Studytube and the customer, and this Privacy Statement does not apply. For questions about such processing, please contact your employer.

When Studytube acts as a Controller, we are responsible for compliance with the GDPR in relation to the processing of your personal data. This Privacy Statement provides a clear overview of our responsibilities and your rights in this context.

Scope of this Privacy Statement

This Privacy Statement applies to:

- Visitors to our website (www.studytube.nl);
- Platform users;
- Individuals who contact us, including partners, suppliers, and representatives of our customers;
- Job applicants applying for a position at Studytube;
- Individuals who post reviews on our platform.

Categories of Personal Data, Purposes, and Legal Bases

Below we describe, for each category of data subjects, which personal data we process, for what purposes, and on what legal bases. We ensure that we only process the personal data necessary for the stated purposes.

- 1. Website Visitors:** This category includes individuals who visit our website, whether or not they become customers.
 - Categories of personal data:
 - Technical data: IP address, browser type, device information, operating system, time of visit
 - Usage data: visited pages, click behavior, session duration, website settings
 - Cookie data: see our Cookie Statement
 - Purposes:
 - Providing access to the website
 - Analyzing website usage to improve our services
 - Securing the website
 - Personalizing the website experience, such as displaying relevant content (if you have given consent)
 - Legal bases:
 - Legitimate interest (website optimization and security)
 - Consent (for non-essential cookies)
- 2. Platform Users:** This category includes individuals who use the Studytube Platform. This may be because

your employer has subscribed to Studytube's services and granted you access to the Platform (Customer-specific Platform Users), or because you use the Platform independently and purchase trainings yourself (Individual Platform Users).

- Categories of personal data:
 - Identification data: name, username, job title (if applicable)
 - Contact data: email address, phone number (if provided)
 - Account data: login credentials, user ID
 - Usage data: learning activities, courses attended, progress, results, preferences
 - Transaction data: purchase and payment information (only for Individual Platform Users)
 - Technical data: IP address, device information, log files
- Purposes:
 - Providing and managing access to the Platform
 - Performing the agreement with your employer or with you as an individual
 - Facilitating learning activities and training programs
 - Reporting and progress monitoring (for you or your employer, depending on context)
 - Invoicing and payment processing (only for Individual Platform Users)
 - Securing, maintaining, and improving the Platform
- Legal bases:
 - Performance of a contract (Article 6(1)(b) GDPR)
 - Legitimate interest (Article 6(1)(f) GDPR), such as improving our services and securing the Platform
 - Consent (Article 6(1)(a) GDPR), for example for optional marketing or additional functionalities
- 3. Contact Persons:** This category includes individuals who contact us through our website, email, telephone, or other channels with questions, requests, or for business purposes.
- Categories of personal data:
 - Identification data: name, job title
 - Contact data: email address, phone number, postal address (if provided)
 - Communication data: content of messages, call or meeting notes
 - Company data: name of your organization (if applicable)
 - Numerical transaction or customer codes
- Purposes:
 - Responding to questions and requests
 - Providing customer support
 - Administrative handling of communications
 - Informing you about our services or offers, if you have given consent
- Legal bases:
 - Legitimate interest (customer communication and service)
 - Consent (for sending marketing or promotional material)
 - Performance of a contract (if your contact forms part of a contractual relationship with Studytube)
- 4. Job Applicants:** This category includes individuals applying for a position at Studytube or expressing interest in potential cooperation.
- Categories of personal data:
 - Identification data: name, date of birth, nationality
 - Contact data: address, telephone number, email address
 - Application data: CV, cover letter, diplomas, references
 - Interview data: interview notes and assessments
 - Other data: any additional information voluntarily provided, such as portfolios or LinkedIn profiles
- Purposes:
 - Assessing applications
 - Managing recruitment procedures
 - Internal administration for recruitment and selection
 - Maintaining contact after the recruitment process, if you have given consent (e.g., for future vacancies)
- Legal bases:
 - Pre-contractual measures

- Legitimate interest (recruitment and selection of personnel)
- Consent (for retaining your data after the recruitment process).
- 5. Reviewers:** This category includes individuals who leave reviews or feedback on our Platform, either as individuals or on behalf of their employer.
 - Categories of personal data:
 - Identification data: first name, last name, job title
 - Company data: company name (if linked to your account)
 - Contact data: email address (not publicly visible)
 - Content data: review text, rating
 - Technical data: IP address and time of posting the review (for authentication and security purposes)
 - Purposes:
 - Publishing reviews on Studytube Academies
 - Authenticating reviews
 - Improving our services
 - Contacting reviewers in case of questions or complaints regarding their review
 - Legal bases:
 - Performance of an agreement (review agreement)
 - Legitimate interest (improving our services and ensuring authenticity of reviews)
- 6. Internal Processes:** This category includes data processed for our internal operations, compliance, and system management, regardless of the source of such data.
 - Categories of personal data:
 - Usage data: log files, error reports
 - Technical data: IP addresses, system information
 - Communication data: email exchanges, support tickets
 - Company data: customer or partner information necessary for contract management
 - Purposes:
 - Compliance with legal and regulatory obligations
 - Internal controls and audit purposes
 - Improvement of our services and systems
 - Handling of disputes and complaints
 - Monitoring system use to detect and resolve technical issues
 - Legal bases:
 - Legal obligation (compliance)
 - Legitimate interest (business operations and system management)

Studytube is not responsible or liable for the data processing activities of any third party acting as an independent Controller.

Data Retention

We do not store personal data longer than necessary for the purposes for which it was collected. After the retention period expires, data is anonymized or deleted so that you can no longer be identified.

Retention periods:

- **Website visitors:** 2 years (analytical data), in accordance with the cookie statement (cookies).
- **Platform users:** If you are an individual platform user, we retain your data for up to 1 year after your user account has been closed. If you are a customer-specific platform user, your employer determines how long we may retain your data. Please note that legal obligations may require us to retain certain data for a longer period than stated above. After the retention period has expired, we store your data in a form in which you are no longer identifiable or traceable.
- **Contact persons:** 3 years after the last contact, unless you have given consent for a longer retention period (for example, for marketing purposes).
- **Job applicants:** Candidate data is automatically deleted after 28 days. Candidates receive an email 28 days prior to deletion, asking for consent to retain their data for a longer period (up to 365 days) for future job opportunities. If no consent is given, all data is permanently deleted after the 28-day period.

- **Reviewers:** up to 1 year after deletion of review or account;
- **Internal processes:** In accordance with statutory retention periods (at least 7 years for fiscal data), other data are retained for a maximum of 2 years, unless otherwise required for audits or disputes.

If you request deletion of your data, we will comply unless legal retention requirements prevent us from doing so.

Data Security

Only relevant personal data are processed. We take appropriate **technical and organizational measures** to protect your personal data against loss, unauthorized disclosure, or unauthorized access. We apply an **internal authorization process** for our employees and an **internal data breach procedure**. In addition, we make daily backups of our database and secure our systems in accordance with applicable information security standards.

To ensure the security of your data, Studytube has implemented an **ISO 27001-certified information security policy**, which is reviewed several times per year by external auditors.

Some of our specific measures include:

1. **Limited access:** only authorized employees have access to your personal data on a strict *need-to-know* basis.
2. **Secured systems:** our systems are protected with encryption of data *in transit* and *at rest*.
3. **Regular security updates:** we regularly perform updates and penetration tests to protect our systems against emerging threats.
4. **Prompt data breach response:** we maintain strict procedures for dealing with data breaches, including prompt notification to affected individuals and authorities where required.

Despite our efforts to protect your data, no system is entirely immune to risks. Should a data breach occur, we will follow our internal procedures to minimize its impact and notify you as soon as possible.

Who Has Access to Your Personal Data?

1. **Studytube personnel.**
We may grant access to our employees or other individuals working for us, including individuals employed by our group companies, on a strict need-to-know basis.
2. **Training institutions and trainers.**
When you register for an in-person training session with an external trainer via the Platform, your personal data will be shared with the relevant training institution. In such cases, the training institution acts as the *Data Controller*. Its own privacy policy applies. Please refer to your corporate academy for an overview of our external training institutions. We advise you to consult the relevant institution's privacy policy before registering.
3. **Processors.**
Studytube may engage third parties to process personal data on its behalf, such as hosting or cloud providers, or SaaS vendors used to deliver our services. Studytube carefully selects these processors and enters into **data processing agreements** with them, ensuring appropriate protection of your personal data.
4. **Links on our website.**
Our website may contain links to third-party websites. When you visit a third-party website through our site, personal data may be collected by that third party. We make no representations or warranties regarding the privacy policies of any external providers or websites and are not responsible for their content or practices. External providers are responsible for informing you about their own privacy policies, which we recommend that you review.
5. **Intended successors.**
We may transfer your personal data to (prospective) successors in the event that our business, or part of it, is transferred or continued by another entity.
6. **Competent authorities.**
We may disclose your personal data to government or regulatory authorities, such as tax authorities or law enforcement agencies, only when required by law—for example, in cases involving fraud or illegal activity.

International Data Transfers

Personal data may be stored or processed by us, or by third parties engaged by us, outside the European Union (EU) or the European Economic Area (EEA) only in compliance with applicable data transfer regulations under the GDPR. This means that we will only transfer your personal data outside the EEA if:

1. The European Commission has determined that the destination country provides an adequate level of protection;
2. Appropriate safeguards are in place, such as the use of **EU Standard Contractual Clauses**; or
3. Additional technical and organizational measures have been implemented to ensure adequate data protection.

For more information about international data transfers, please contact us at legal@studytube.nl.

Your Rights

You have the following rights concerning your personal data:

1. **Right to withdraw consent:** If we process your data based on your consent, you may withdraw that consent at any time. This does not affect the lawfulness of processing carried out before withdrawal.
2. **Right to information and access:** You have the right to know whether we process your personal data and to obtain a copy of such data in a clear and structured format.
3. **Right to rectification, restriction, or erasure:** You have the right to have your data corrected, limited, or deleted. This includes the right to correct inaccurate data and the “right to be forgotten.”
4. **Right to object:** Under certain circumstances, you may object to the processing of your data when based on our legitimate interests. In such cases, we will cease processing unless we can demonstrate compelling legitimate grounds or a legal necessity.
5. **Right to data portability:** You have the right to receive your personal data, which you have provided to us, in a structured, commonly used, and machine-readable format, and to transfer it to another controller where processing is based on consent or contract performance.

To exercise your rights, please send a request to legal@studytube.nl. We may ask you to provide a copy of your identification for verification purposes. We will respond within 30 days of receiving your request.

Policy on the Processing of Personal Data under the Digital Services Act (DSA)

In accordance with the Digital Services Act (DSA), Studytube is subject to certain obligations to act against illegal content. To fulfill these obligations, Studytube also processes personal data as described below.

1. Content moderation.

We process personal data of users who generate content in our online community (for example, by posting comments) for the purpose of content moderation. The legal basis is our legitimate interest (Article 6(1)(f) GDPR) in moderating and removing illegal content. We process your name, account information, and the content you generate on our platform.

2. Handling reports of illegal content.

Under the DSA, users may report illegal content present in our community. We assess such reports and review the reported content to determine whether action is necessary (e.g., removal). We process personal data of both the reporting party and the user whose content is under review. We inform both parties of the outcome, including available remedies. The legal bases are compliance with a legal obligation (Article 6(1)(c) GDPR) and our legitimate interest (Article 6(1)(f) GDPR) in efficiently handling such reports.

3. Handling complaints.

We maintain a complaint-handling process that allows users to appeal moderation decisions. In this context, we may again review the relevant content and process personal data of both the complainant and the affected user. We inform both parties of our decision and available options for appeal. The legal bases are compliance with a legal obligation (Article 6(1)(c) GDPR) and legitimate interest (Article 6(1)(f) GDPR). For handling reports and complaints, we process your name, contact details (such as email address), and the information contained in the report or complaint. For users whose content is reviewed, we process your name, account information, and the reported content.

4. Measures against illegal content or misuse.

If Studytube, through its own investigation or based on a report, determines that illegal content is

present, we are obligated to take action. We may remove or restrict such content. We will inform you when restrictions are applied to your content. The legal bases are compliance with a legal obligation (Article 6(1)(c) GDPR) and legitimate interest (Article 6(1)(f) GDPR). If misuse of our platform is detected (for example, repeated posting of illegal content or knowingly submitting false reports), we may suspend the user after issuing a warning. The same legal bases apply. We process your name, account details, previous reports or complaints, and the content you generated.

Complaints

If you have any complaints about how we process your personal data, please contact us at legal@studytube.nl. You also have the right to submit a complaint to the Dutch Data Protection Authority (Autoriteit Persoonsgegevens), which supervises compliance with data protection law, if you believe your data has been processed unlawfully.

Updates

We may update this Privacy Statement from time to time. If significant changes affect your rights, we will notify you by email or via a notice on our website. The most recent version is always available at www.studytube.nl.

Last updated: September 2025.