

Studytube Privacy Statement

Studytube B.V. ("Studytube") offers an online, automated system which serves as a knowledge platform ("Platform") and on which you have access to knowledge, study programmes, courses, training and other forms of learning. Please refer to our terms of use (www.studytube.nl/gebruiksvoorwaarden-klanten) for a description. When you visit our website (www.studytube.nl, the "Website") and/or when you make use of the Platform, Studytube will process personal data about you. In accordance with the GDPR you will be informed in this document about the processing of your personal information and how you can exercise your rights.

To whom does this Privacy Statement apply?

This Privacy Statement applies to all users of our Website and the Platform. We distinguish between the following user groups:

1) Customer-specific Platform users

You are in this category when your employer purchases services from Studytube and provides you, as an employee, access to the Platform.

If you are in this category, this Privacy Statement is partly applicable to you.

2) Individual Platform users

You are in this category if you use the Platform on your own initiative and purchase individual training courses through the Platform.

If you are in this category, this Privacy Statement is applicable to you.

3) Visitors of the Website

When you visit our website, we may process personal data about you. We do this for instance when you contact us (via the chat functionality 'Studybot, or in a different way). We also use cookies to generate information about the way you use the Website. For more information, please see our Cookie Statement (www.studytube.nl/cookieverklaring).

If you are in this category, this Privacy Statement is applicable to you.

What is Studytube's role from a GDPR perspective?

The role of Studytube varies per processing activity. This Privacy Statement only applies to the processing of personal data with regard to which Studytube acts as data Controller. This means that Studytube decides on the purpose and the means of data processing. In this policy we will outline in which instances Studytube is Controller.

We may also process personal data on behalf of a customer (for instance your employer). In such an event the customer is the Controller and Studytube is the Processor, whereby the customer and Studytube have entered into a processing agreement. If you want more information about these data processing activities we advise you to contact your employer.

If you register for classroom training with an external trainer through the Platform, your personal data will be passed on to the training institution. When the training institution processes your personal data for its own purposes, the training institution acts as Controller. In this case, the training institution's privacy policy is also applicable. Please refer to your own company academy or for an overview of our external training institutions. We advise you to consult the privacy policy of training institutions.

Studytube is not responsible or liable for the data processing activities of any third party that processes personal data as data controller.

For what purposes are personal data processed?

Studytube processes the personal data of various user groups for the purposes and activities listed below, including the type of personal data that is processed:

Customer Specific Users

- 1) For the purpose of sharing reviews on the Studytube Academies.
The following data is processed for this purpose: first name, surname, title, company name (when linked to your account) will be visible with your review. Your email address will not be displayed.
*Please see the Review section below for more details
- 2) For the purpose of internal processes, such as ensuring compliance with laws and regulations, analysing the usage of our services for improvement purposes, quality reviews, handling User requests, complaints and disputes and Studytube's internal management and control.
The following data is processed for this purpose: first name, surname, username, user-id, initials, title, work email address, ip address, data relating to use of the product and services.

Individual users

- 1) The provision of the LMS and creation of an account. This gives you access to the LMS where training courses are provided.
The following data is processed for this purpose: unique user ID, first and last name, e-mail, password, transaction details.
- 2) Researching and analysing user data in order to improve the quality and user experience of the LMS.
The following data is processed for this purpose: unique user ID, reviews (open text fields), username, IP address, browser type, time of internet session, pages visited, average time of online training, training completed, number of reviews online training.
- 3) For the purpose of security, control and prevention of abuse and improper use of the LMS. This includes performing maintenance, making backups, making improvements and providing support.
The following data is processed for this purpose: unique user ID, login date and time, registration date, last activity, account delete date and data provided by you when contacting us.
- 4) When you contact us via the online support tool.
The following data is processed for this purpose: account data and data on the use of the platform as well as data provided by you in order to answer your questions and requests.
- 5) For the purpose of information mailings and other ways to keep you informed about Studytube's products and services.
The following data is processed for this purpose: username, e-mail address.
- 6) For the purpose of sharing reviews on the Studytube Academies.
The following data is processed for this purpose: first name, surname, title, company name (when linked to your account) will be visible with your review. Your email address will not be displayed.
Please see the Review section below for more details.

Website visitors

1) Provision of the Website

Studytube processes personal data when you visit the Website and when you contact us via the Website.

The following data is processed: IP address, date and time of your website visit, your activity on the website and other data that we collect through cookies, your name and e-mail address as well as other data provided by you during your contact with us, data relating to the handling of your questions and requests.

What is the basis for processing your personal data?

If you are an Individual Platform user or a Customer Specific Platform User, we may process your personal data for the purpose of a contract. For instance: you want to publish a review and in order to do that we ask you to fill in your name. We may also process your personal data if we have a legitimate interest in doing so. This is for the case when we use personal data in order to secure and improve our Platform.

Only if the legitimate interests outweighs your privacy interests or other interests or fundamental rights, will Studytube base its processing on this legal ground. You can contact us for more information on the legitimate interests in relation to a specific processing operation.

If you are a Website Visitor we process your personal data based on consent in the case of the cookies we place, or on our legitimate interest for as far as this is necessary to achieve our purposes.

In conclusion, we may process your Personal Data because we are required to do so by law. If we cannot appeal to the above bases, we may ask you for your consent to the processing of your Personal Data.

How long will my personal data be retained?

We do not keep your personal data longer than necessary for the purposes for which they are processed. If you are an individual Platform user, we will retain your data for up to 1 year after your user account is closed. If you are a Customer Specific Platform user, your employer will determine how long we may store your data. Please be informed that legal obligations might require us to keep certain data for a period longer than stated above. After expiration of a retention period we will store your data in a form in which you are no longer identifiable and cannot be traced.

Data security

Only relevant personal data is processed. We take appropriate technical and organisational measures to protect your personal data against loss or unauthorised disclosure or access. To this end, we use an internal authorisation process for our employees and an internal procedure for dealing with data breach. In addition, we make a daily backup of our database and secure our systems according to the applicable information security standards. In order to guarantee the security of the data, Studytube has drawn up an ISO 27001-certified data security policy that is assessed several times a year by external auditors.

Who has access to your personal data?

- 1) Studytube staff. We may grant our staff members or other persons working for us access to your personal data on a need-to-know basis.
- 2) Training institutions and employees of training institutions. When you purchase a training from an external academy, we may disclose your personal data to the training institutions who provide the training, as far as this is necessary for them to handle your purchase. These training institutions process your personal data for their own purposes and qualify independently as data controllers.
- 3) Processors. Studytube may engage third parties to process personal data on behalf of Studytube, such as hosting and cloud providers or SaaS providers that we use to support us in the performing of

our services. Studytube selects these third parties carefully and concludes processing agreements with these parties which include arrangements on the protection of your personal data.

- 4) Intended legal successors. We may, where appropriate, pass on your personal data to (intended) successors in title in order to be able to continue to provide our services in whole or in part.
- 5) Competent government authorities. Only if we are legally obliged to do so, your personal data may be disclosed to government agencies such as regulators, tax authorities and investigative authorities, if, for example, in the case of fraud or illegal activities a request is made by the police.

Data transfers outside of the EEA

Some of Studytube's subprocessors are located outside the EEA in countries for which no adequacy decision exists. With these parties Studytube agreed on Standard Contractual Clauses as published by the European Committee in order to guarantee that your data will benefit from a level of data protection similar to the GDPR. In addition, Studytube carefully assesses whether these subprocessors in practice offer an adequate level of protection of your data and will install appropriate safeguards to secure your personal data if needed. Reach out to legal@studytube.nl in order to obtain more information on these safeguards.

What are your rights?

You always have the right, at reasonable intervals, to view the personal data processed by us about you. After viewing it, you can ask us to rectify or delete it if the data is incorrect. In addition, you can object to the processing of your personal data. If you wish to view your personal data, have it rectified or deleted, or if you wish to lodge an objection, please send your request to info@studytube.nl. We may ask you to send a copy of your proof of identity so that we will be able to verify that you are the person to whom the personal details belong.

Review policy

To improve the quality of the learning content on this Platform, Studytube encourages you to submit a review via the review form. This review will be visible on all Studytube Academies and on the Studytube's public Academy.

For authentication purposes your first name, surname, title and company name (when linked to your account) will be displayed with your review. You are also required to submit your email address, but this will not be displayed. Please note that when you share a review, Google might be able to index it. This will only happen when the review appears in our public academy.

The legal ground for this processing of your personal data is "performance of a contract". You can anonymise or edit your review at any time in your own account. Your review will be anonymised automatically when either your Academy or your user account is deactivated.

Studytube is at all times entitled to remove your review without any notice, for example if it suspects that the review violates any law or regulation or is fraudulent.

Do you have any complaints?

Any complaints about our processing of your personal data can be submitted by sending an e-mail to info@studytube.nl. In addition, a complaint can be lodged with the Dutch Data Protection Authority (AP), which supervises compliance with the applicable privacy legislation, if you believe that the processing of your personal data is not lawful.

Updates

Note that we may make changes to this Privacy Statement from time to time. Where required, we will inform

you of such updates. The current version is always available on our website www.studytube.nl This Privacy Statement was last updated in August 2023.
