

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. This Privacy Statement may be amended at any time. The latest version is at all times published on our website.

To whom does this Privacy Statement apply?

This Privacy Statement applies to all users of our Website and the Platform, while 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, with access to the Platform.

If you are in this category, this Privacy Statement does not apply to you. Learn more below under 'What is Studytube's role from a GDPR perspective?'

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, you are subject to this Privacy Statement.

3) Visitors to the Website

When you visit our website, we may process personal data about you. We do this for example when you contact us via the chat functionality 'Studybot', or when you contact us 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?

This Privacy Statement only applies to the processing of personal data with regard to which Studytube acts as data controller. We may also process personal data on behalf of a customer - this could be your employer, for example. In these cases we are not the data controller but qualify as a processor. In this situation, we enter into a processing agreement with the customer in which arrangements are made about the way the Platform is provided. For these processes of personal data, the customer is the data controller and the customer's privacy policy will be applicable. We advise you to please read this privacy policy. 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 data controller. In this case, the training institution's privacy policy is also applicable. Please refer to your own company academy or this one 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 third parties who process personal data as data controller.

Which personal data is processed and how is this information used?

The activities conducted by Studytube for the various user groups are listed below. The information processed is also included.

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:
Data such as 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.

Website visitors

- 1) Provision of the Website
Studytube processes personal data when you visit the Website and when you contact us via the Website. For this purpose, 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.

For what purposes are personal data processed?

We process your personal data for the following purposes:

- 1) To enable you to use the Platform;
- 2) For security purposes and to prevent abuse and improper use of the Platform;
- 3) To improve the product and user experience of the Platform;
- 4) Support, handling questions and requests, handling complaints, handling and preventing claims;
- 5) To maintain contact with you and keep you informed of our products and services;
- 6) To comply with applicable laws and regulations and protect our rights and interests.

What is the basis for processing your personal data?

We may only process personal data if a legal basis is available in the respective case. If you are an individual Platform user, we process your personal data under an agreement that we have with you. We may also process your personal data if we have a legitimate interest in doing so. This is for example the case when we secure and improve our Platform. 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 we are legally obliged to do so, we may keep certain data for a period longer than stated above, to the extent necessary to comply with this legal obligation. In addition, we may keep your personal data necessary for the purpose of legal proceedings, complaints and disputes for a longer period, to the extent necessary for the

protection of our interests. When the aforementioned retention periods have expired, 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. We may disclose personal data to training institutions who provide training. 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. 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.

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.

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.