

# SHBP PRIVACY POLICY

Last updated 21 December 2022.

Thanks for joining our Course! We at SHBP Academy OÜ (“SHBP”, “we,” “us,” or “our”) respect your privacy and therefore aim to provide you with the best understanding of our privacy practices and assure you that your data will remain secure. This Privacy Policy (“Policy”) describes, among other things, the categories of personal data we collect when you register for the Course, to the relevant webinar and to the trial module of the Course, how we use it, and which rights you have with respect to your personal data.

This Policy shall be read alongside the SHBP Privacy Policy.

We act as a <u>data controller</u> in relation to the personal data you provide to us under this Policy.
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When you submit the personal data to us, you may be asked to consent to some kind of processing, as described in this Policy, to enable us to provide you with the requested information or service, if no other legal ground can be used.

We do not aim to and do not knowingly collect nor process data of persons under the age of 16 without parental consent. If we become aware that we have inadvertently collected data of persons under the age of 16 without parental consent, we will take reasonable steps to delete it as soon as possible, unless we obtain the legal guardian’s permission. If you are a parent or legal guardian and you learn that your child is using our Site and you don’t want it to, please contact us at [info@shbpacademy.com](mailto:info@shbpacademy.com).

## Definitions

We use the terms in the meaning given them in SHBP Site Privacy Policy. The “data subject” for the purposes of this Policy is any living individual who registers for the Course, to the relevant webinar and (or) to the trial module of the Course.

## What Data We Get

We collect personal data you provide to us directly, like the information you enter yourself, and personal data we obtain automatically, like information about your device and what parts of our Site you interact with.

We use your personal data only for the purposes listed in this Policy. We may share your personal data with third parties solely as defined herein. We do not use automated decision-making and profiling.

## We May Collect the Following Data:

- Contact information
  - first and last name,
  - email address,
  - phone number,
  - your nickname and other public information of your social media accounts, where applicable.
- Message information that may contain your personal data, whether provided exclusively to us through the chatbot or in the Course chat seen by the other data subjects.
- Account data
  - log-in credentials,
  - first and last name,
  - email address,
  - phone number

- if you choose to fill in additional information into your account: your account photo, country, city, sex, date of birth.
- Transaction information
  - transaction amount,
  - date and time transaction occurred,
  - transaction status.

We do not collect nor have access to any other financial information. If you choose to make a purchase, you will be directed to our third-party payment processor and will provide payment data directly to it.

- Your feedback, namely, your comments to homework during the Course.
- Survey information

We will invite you to complete a survey prior and after the Course. When you participate, we will collect your first and last name, email address, and the content of your response.

- Your learning progress
  - your homework, written assignments, quizzes, and examinations, and the results of any assignments,
  - data on the learning progress, e.g. modules, assignments, workspaces, and quizzes you've started and completed.
- Identifiers
  - IP address,
  - operating system,
  - browser ID, and
  - other information about your device and connection.
- Usage data
  - time spent on the Course webpage,
  - features used,
  - click data, and
  - date and time of access.

Our Purposes	Legal basis
We collect <b>contact information</b> you provide via the registration form and <b>account data</b> to create and manage your Account and send you administrative messages relevant to the Course (e.g. reminders, notifications, and updates).	Performance of a contract
We collect <b>contact information</b> and <b>message information</b> to respond to your questions and requests submitted to us through the chatbot, Course chat, email communication, telephone call or our social media accounts.	Performance of a contract
We collect <b>your learning progress</b> and <b>your feedback</b> to review your homework, monitor and track your progress on the Course.	Performance of a contract
We collect <b>contact information</b> to suggest and notify you about the new Courses, offers and other information relevant to you once you <u>have subscribed</u> to our newsletter. <u>You can update your marketing preferences at any time.</u>	Your Consent

We collect <b>transaction information</b> to check your payment status and confirm your access to the Course enrolled.	Performance of a contract
We collect <b>contact information</b> you provide via the registration form to provide you with the access to webinar or trial module once you have enrolled.	Performance of a contract
We collect <b>contact information, account data</b> and <b>your learning progress</b> to issue completion certificates.	Performance of a contract
We collect <b>survey information</b> to improve our Courses and provide you with the best user experience.	Our legitimate interest
We collect <b>identifiers</b> and <b>usage data</b> to help us develop and improve the functionality of the Site.	Your Consent
We collect <b>identifiers</b> and <b>usage data</b> to prevent any fraudulent actions or intervention of the malware.	Our legitimate interest
We collect <b>identifiers</b> and <b>usage data</b> to ensure the functionality of the Site.	Our legitimate interest
We collect <b>contact information, message information, account data, identifiers</b> and <b>usage data</b> to record the processing activities under art. 30 of the GDPR and comply with other applicable laws.	Legal obligation

### **We use Cookies**

Some data listed above (namely, identifiers and usage data) are collected through the use of cookies and other tracking technologies, as detailed in the Cookies Policy.

Cookies are small pieces of data that websites send to your browser. They are stored on your device, which might be a personal computer, a mobile phone, a tablet or any other device. Cookies help us to enhance your user experience and remember your choices and other information, namely as follows:

- to recognize your device and settings;
- to define you as a unique user to personalize your user experience (e.g., keep the language preference);
- store your preferences and settings;
- to analyse your usage of the Site to improve our Site and services;
- to ensure the functionality of the Site;
- to prevent fraud;
- for marketing purposes.

We use the following types of cookies:

- Necessary;
- Analytics;
- Marketing.

For more information on our use of cookies, please refer to our Cookies Policy.

### **You may opt-out the cookies**

You can set your web browser to limit the types of cookies you allow, or refuse cookies altogether. If you do so, please be aware that some or all features of the Site may be unavailable to you, and your experience may be different or less functional. To modify the settings of your browser, follow the instructions included in the following links, otherwise you should use the “Help” or “Options” menu in your browser for more details:

- Google Chrome (<https://support.google.com/chrome/answer/95647?hl=en>);
- Safari (<https://support.apple.com/en-gb/guide/safari/sfri11471/mac>);
- Opera (<https://help.opera.com/en/latest/web-preferences/>);
- Microsoft Edge (<https://support.microsoft.com/en-us/topic/delete-and-manage-cookies-168dab11-0753-043d-7c16-ed5947fc64d>);
- Mozilla Firefox (<https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer>).

## Legal Grounds for Use of Your Data

We only process your personal data if we have a lawful basis for doing so. The legal grounds for processing your personal data are as follows:

### 1. Contractual obligation

We need to process your personal data to perform our obligations under the contract with you (namely, when you register for the Course, to the webinar and to the trial module of the Course, you agree to be a party to our Terms of Use and Public Agreement). This includes our need to identify you and provide you with access to the Course, webinar or trial module, send you relevant administrative messages, maintain your account, etc.

### 2. Your consent

We collect some kinds of personal data you choose to give us and process it based on the consent you expressly grant to us at the time we collect such data. For example, you may consent to receive marketing messages from us.

You may **withdraw your consent** to the processing of your personal data at any time. **Please remember that the withdrawal of consent does NOT automatically mean that the processing before the withdrawal is considered unlawful.** You may withdraw the consent to the processing of your personal data by sending us an email at [info@shbpacademy.com](mailto:info@shbpacademy.com) or by contacting us in any other way convenient for you.

### 3. Legitimate interest

We process your personal data to prevent any fraudulent actions or security threats and to provide you with the desired information and services. Also, we need some data to improve our services and give you a pleasant user experience (e.g. we use survey data to understand the weak points of our Courses, the usefulness of some features, etc., and therefore enhance the performance of the services we offer).

### 4. Legal obligation

We process your personal data to fulfil the applicable legal obligations arising mainly from the GDPR or national law (e.g. to keep transaction records, respond to your data subject requests). In the event of you sending us the request to fulfil the rights, we may ask you for some personal data we already have to identify you and achieve compliance with the applicable law.

## Data Security, Integrity and Retention

We will only store and process your personal data for a reasonable period of time, which is based on the purpose for which we are using your data. Once that purpose has been fulfilled, we will securely delete or anonymise it (so that we, or anyone else, can no longer identify you based on it) unless we are required to retain the data longer to comply with our legal obligations or as expressly permitted by law. However, we may not delete or anonymize your data if we are compelled to keep it under the under article 30 of the GDPR and other applicable law.

We store the data you have provided to us via the “Contact Us” form, email, telephone call or the Course chat for 6 months.

We store the data you have provided to us when subscribing to our newsletter until you withdraw your consent to receive our offers and other types of marketing communication.

We store your contact information from registration forms (namely, the Course or webinar or trial module registration forms) for the time required to create the account and/or to give you access to the webinar.

We store your account data and learning progress for the duration of the Course and for a certain time after the Course ends, depending on the tariff chosen, namely:

- Standard: for 3 months;
- Business: for 4 months;
- Premium: for 6 months.

We store the data you have provided us in the course or communication in the chosen chatbot as long as our conversation remains active and for 6 months after the conversation is over.

We store survey information for 6 months. After the expiry of the retention period, we either delete or anonymise the results so we cannot trace you back and retrieve the personality of the respondent.

We keep your transaction information for the period of time required by national law or payment regulations. We cannot change the retention period as we use the payment processor to collect this data.

Your messages left within the social media platforms will be retained as long as these platforms set forth in their privacy-related policies.

We store identifiers and usage data for the period specified in our [Cookie Policy](#).

You may request to delete your personal data by sending us an email at [info@shbpacademy.com](mailto:info@shbpacademy.com).

We have implemented appropriate organizational, technical, administrative, and physical security measures that are designed to protect your personal data from unauthorized access, disclosure, use, and modification. We regularly review our security procedures and policies to consider appropriate new technology and methods. Please be aware that, despite our best efforts, no system can be 100% secured from unauthorized access to your data by third parties, but we do our best to early detect and mitigate likely risks.

### **Data Sharing and Disclosure**

We may share your personal data with our contractors, third-party service providers and other third parties. Where possible, we always sign data processing agreements (DPAs) and Non-Disclosure Agreements (NDAs) with our third parties.

#### **Sharing personal data with joint controllers**

In some cases, we act as a joint controller while processing your personal data. It means that other entities or individuals and we jointly determine the purposes and means of processing your personal data.

Under this Policy, we only share the contact information of persons who register for our Course, webinar or trial module of the Course in order to provide them with relevant offers and other marketing communication about other Courses that are available on the Site.

Please find out more about joint controllers in SHBP Privacy Policy.

#### **Sharing personal data with other data controllers**

We may share and disclose your personal data to other data controllers:

- [Google Ads](#) (Google LLC, USA): to deliver relevant online advertising to you on search results or other websites. You may read more about its privacy practices [here](#).

#### **Sharing personal data with data processors**

In some cases we need assistance from third parties to enable your access to the Course and other functionalities of the Site. These third parties perform services on our behalf, like payment processing, customer service, fraud and abuse prevention, data storage and analysis, marketing services, communication tools provision, email and hosting services. They will have access to your personal data to the extent necessary to perform their function, but they are prohibited from using your information for other purposes unless you have specifically given them consent to do so.

Therefore, we may share and disclose your personal data to other data processors:

- Google Workspace (Google LLC, USA): to use Google services such as Gmail, Drive, Docs, Forms to communicate with you and provide you with the opportunity to take surveys. You may read its Privacy Policy [here](#).
- Telegram (Telegram Messenger Inc., British Virgin Islands) and Viber (Viber Media S.à r.l., Luxembourg): to respond to your requests, provide you with the newsletter and notify you about our services and Courses, via our Telegram chatbot and Viber chatbot. You may read their Privacy Policy [here](#) and [here](#).
- Tilda (Tilda Publishing, Switzerland) and Hostinger (Hostinger International Ltd., the Republic of Cyprus): to provide secure transfer and storage of personal data on the servers. You may read their Privacy Policy [here](#) and [here](#).
- Kajabi (“Kajabi” LLC, USA): to provide you with the access to the Course and its materials and to communicate with you via e-mail. You may read its Privacy Policy [here](#).
- Stripe (Stripe Inc., USA) and Checkout (VeriFone, Inc., USA): to maintain payments. You may read their Privacy Policy [here](#) and [here](#).
- SendPulse (“SendPulse” LLC, United States): to respond to your requests, provide you with the newsletter and offers and notify you about our services and Courses via our Telegram chatbot. You may read its Privacy Policy [here](#).
- Tidio (“Tidio” LLC, United States): to respond to your requests, provide you with the newsletter and offers and notify you about our services and Courses via chatbot and live chat. You may read its Privacy Policy [here](#).
- JivoChat (“JivoChat” LLC, United States): to respond to your requests, provide you with the newsletter and offers and notify you about our services and Courses via chatbot and live chat. You may read its Privacy Policy [here](#).
- Our Contractors and Platforms with our courses. Subject to reasonable organizational and technical safeguards, we may disclose some of your personal data to our outsource specialists or employees and to the support service of Platforms with our courses:
  - technical specialists to improve our Site and your experience as well as deliver the functionality of the Site;
  - sales and marketing specialists to provide you with better client service, send you newsletters and special offers;
  - chat managers to communicate with you and respond to your requests;
  - legal and accounting professionals to make our business accurate and transparent.

### **Transferring Your Personal Data Outside of the European Economic Area**

Your personal data may be transferred to the countries outside the EU or EEA, particularly if our service suppliers and contractors are non-EU/EEA based. Where these countries do not fall under Article 45 of the GDPR on the adequate level of data protection, we may transfer your personal data if the appropriate safeguards were put in place as determined under Article 46 of the GDPR.

These steps include implementing the Standard Contractual Clauses (SCC) approved by the European Commission. We put supplementary measures in place when transferring data outside the EU and the EEA, where appropriate.

In specific situation when we may not rely on the Articles 45 and 46 of the GDPR, we may transfer your personal data under Article 49 of the GDPR on the derogations for specific situations, namely:

1. your consent,
2. performance of the contract to which you and we are parties or you asked us to take steps to enter into an agreement,
3. protection of your vital interests, if applicable.

Disclosure of personal data to other data controllers and/or data processors will be done in accordance with the applicable personal data laws and regulations.

### **What Rights Do You Have Regarding Your Personal Data?**

You may enjoy the bunch of rights with respect to your personal data by submitting your request at [info@shbpacademy.com](mailto:info@shbpacademy.com). Please be aware that in some cases we may ask you to provide us with additional information in order to verify your identity and proceed with your request.

**Access.** You may ask us to provide you with a copy of your personal data collected, along with information regarding the nature, processing and disclosure of that personal data.

**Rectification.** You may ask us to update, correct or supplement the false data, missing or incomplete personal data. Your first and last name, email address, and other identifiable profile information is editable through the profile settings in your account.

**Erasure (be “forgotten”).** You may ask us to delete your personal data collected, except insofar it is prohibited by appropriate laws.

**Restriction of Processing.** You may ask us to restrict further processing where: (i) your personal data is not correct or out-dated; (ii) the processing is unlawful.

**Objection.** Where the processing of your personal data is based on our legitimate interests, or for direct marketing purposes, you may raise objections to such processing on grounds relating to your particular situation. This also applies to profiling based on these provisions, if any.

**Data Portability.** You may ask us to transfer a copy of your personal data to another organisation or to you.

**Withdrawal of Consent.** You may withdraw the consent when your personal data are processed upon it (see section Legal Grounds for Use of Your Data).

**Lodge a Complaint.** You may lodge a complaint with the supervisory data protection authority pertaining to the processing of your personal data. You may submit the complaint to the supervisory authority of your place of residence within the EU or to the data protection authority stated in this Policy.

### **Data Protection Authority**

We kindly invite you to share your concerns with us in the first place regarding any issue related to your personal data processing. You may use the following channels to address your inquiries: [info@shbpacademy.com](mailto:info@shbpacademy.com).

In case you believe that we are somehow infringing your personal data rights granted by the GDPR, you may submit the complaint with the Data Protection Authority (however, be aware that some supervisory authorities insist on you contacting us first). For more information, please contact your national data protection authority. We will cooperate with the appropriate governmental authorities to resolve any privacy-related complaints that cannot be amicably resolved between you and us.

### **Our Supervisory Authority**

#### **Data Protection Inspectorate**

Estonian Data Protection Inspectorate

39 Tatari St., 10134 Tallinn

**Tel.:** (from abroad add +372) 627 4135

**Email:** info[a]aki.ee

*Please bear in mind that there could be certain requirements for a data subject to complete a complaint.*

### **Changes to the Privacy Policy**

This Policy may be updated or amended from time to time due to the implementation of new technologies, in accordance with best practices in our industry, law requirements or for other purposes. We will send notice to you if these changes are major and where required by applicable laws, we will obtain your consent. Also, we encourage you to regularly review this Policy to check for any changes.

Such notification may be provided via your email address or announcement on the Site and/or by other means, consistent with applicable law.

### **Contact us**

If you have any privacy-related questions or unresolved issues, please do not hesitate to contact us through:

Email address: [info@shbpacademy.com](mailto:info@shbpacademy.com).

Phone number: +38(098) 455 60 95.