

PRIVACY POLICY

Last updated 21 December 2022.

We at **SHBP Academy OÜ** (“SHBP”, “we,” “us,” or “our”) respect your privacy and therefore aim to equip 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, how we use it, and which rights you have with respect to your personal data.

Please read this Policy carefully. This Policy applies to you when you visit the SPBP website at:

<https://shbpacademy.com/>

<https://shbp.info/>

<https://shbpacademy.online/>

(“Site”) and subdomains in order to simply surf the Site, contact us, subscribe to our newsletter, or seek to purchase educational courses (“Courses”) or to register for a webinar or the trial module of the Course available on the Site, regardless of whether you register an account on our Site.

We act as a data controller in relation to the personal data you provide to us while visiting the Site. However, once you purchase the Course or register for a webinar or to the trial module of the Course, the party providing the Course or hosting the webinar will be considered a data controller as to your personal data it collects and processes in order to provide you with the relevant services.

Simultaneously, we may act as joint controllers regarding your personal data together with the parties who provide the Courses, as described below.

When you submit the personal data through our Site, you may be asked to consent to some kind of processing of the personal data you provide, as described in this Policy, to enable us to provide you with the requested information or services, 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.

Definitions

We use the following definitions in this Policy:

“*data controller*” means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal data is processed.

“*data processor*” means the natural or legal person who processes personal data on behalf of the data controller.

“*data subject*” is any living individual who is using our Site.

“*personal data*” means any information relating to you and helping identify you (directly or indirectly) such as your name, last name, email, location data, etc.

“*processing*” means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

“*third party*” means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

“*joint controllers*” means two or more controllers jointly determining the purposes and means of processing.

What Data Do 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 collected through the Site 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,
 - nickname and other public information of your social media accounts, where applicable.
- Message information that may contain your personal data, obtained when communicating with us through any channel.
- Identifiers
 - IP address,
 - operating system,
 - browser ID, and
 - other information about your device and connection.
- Usage data
 - time spent on the Site,
 - pages visited,
 - features used,
 - click data, and
 - pages that led or referred you to Site, date and time.

Our Purposes	Legal basis
We collect contact information and message information to respond to your questions and requests submitted to us through Contact Us / Contacts/ Get in touch with ShBP Academy form on the Site which leads to the chosen chatbot, or through email communication, telephone call or our social media accounts.	Performance of a contract
We collect contact information to suggest and notify you about the new features of the Site, Courses 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 identifiers and usage data to help us develop and improve the functionality of the Site.	Your Consent
We collect identifiers to send you customized advertisements or conduct marketing campaigns.	Your Consent

We collect identifiers and usage data to prevent any fraudulent actions or intervention of the malware.	Our legitimate interest
We collect identifiers and usage data to ensure the functionality of the Site.	Our legitimate interest
We collect contact information, message information, identifiers and usage data to record the processing activities under art. 30 of the GDPR and comply with other applicable laws.	Legal obligation

We aim to minimise the data we collect about you to the extent strictly necessary to enable you to use our Site or provide you with special features when you give us your consent.

PLEASE BE AWARE THAT IF YOU WISH TO PURCHASE A COURSE OR REGISTER TO THE WEBINAR OR THE TRIAL MODULE, WE (OR OTHERS PROVIDING THE COURSE) WILL NEED TO PROCESS MORE CATEGORIES OF PERSONAL DATA, IN PARTICULAR, TO CREATE AND MAINTAIN YOUR ACCOUNT, PROVIDE YOU WITH ACCESS TO EDUCATIONAL MATERIALS, ISSUE COMPLETION CERTIFICATE, ETC. YOU CAN READ THE APPROPRIATE PRIVACY POLICY ON THE PAGE OF THE COURSE, WEBINAR OR MODULE.

Given this, please familiarize yourself with our privacy practices as to your personal data we collect and process after you purchase and register for the relevant Course, webinar or trial module / FREE Package. You may find out more at:

<https://shbpacademy.com/terms-and-conditions/>

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 Cookie 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 Cookie 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 e.g., our Terms of Use. When you ask us to get in contact with you to discuss our Courses, you are interested in purchasing or want us to provide you with any other related information, this can be deemed the request of you to form a contract. However, we may ask you to give us a clear consent in case of doubt.

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.

We require the minimum amount of your personal data that is necessary to fulfill the purpose of your interaction with our Site (send you a newsletter or offer, etc.).

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 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 enable our Site to run smoothly and give you a pleasant user experience. We use only strictly necessary data under this legal ground.

4. Legal obligation

We process your personal data to fulfill the applicable legal obligations arising mainly from the GDPR or national law. In the event of you sending us the request to fulfill 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 your data (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 article 30 of the GDPR and (or) other applicable law.

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

We store the data you have provided to us when communicating in the chatbot in the chosen messenger as long as our conversation remains active and for 6 months after the conversation is over.

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.

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@shbpcademy.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.

We collaborate and cooperate in joint processing activities with our partners, namely individual entrepreneur Anatoliy Bondarenko and individual entrepreneur Lyudmyla Kotsyura, both registered in Ukraine, in order to provide you with the variety of possibilities to discover our Site and participate in the Courses or webinars. In respect to these cases of personal data processing, we conclude joint controllers' agreement with our joint controllers in the meaning of Article 26 of the GDPR. The essence of mentioned joint controllers' agreement is following:

- joint controller which received a request from a data subject shall satisfy it and notify thereof the other joint controllers.
- in the event when the joint controller which received a request does not have full information regarding the undergoing processing, it may ask the other joint controllers for lacking information.
- in the event when the joint controller which received a request may not proceed on it, the request shall be transferred to the other joint controllers in accordance with the request and complaints procedure established by each joint controller.

When we act as a joint controller to particular processing of personal data, you may exercise your rights under the GDPR in respect of and against any of us.

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 are unable to provide you with the whole bunch of Site features and functionalities solely on our own. This is why we share your data with third parties who perform services on our behalf, like payment processing, customer service, fraud and abuse prevention, data storage and analysis, marketing services, communication tools services, 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 Analytics](#) (Google LLC, USA): to analyse statistical data on how the Site visitors use the Site in order to improve our Site's functionality and your experience. You may read its Privacy Policy [here](#).

- 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 offers and notify you about our services and Courses, via our Telegram chatbot and Viber chatbot, accordingly. 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, United States): to provide you with access to the Course and its materials and to communicate with you via e-mail. You may read its Privacy Policy [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 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 the specific situations 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. When we act as a joint controller with respect to particular processing of personal data, you may exercise your rights under the GDPR in respect of and against us or other joint controllers.

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.

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 the necessity for the performance of a task carried out in the public interest or of 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.

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.

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