

**/learnship™/**

# PRIVACY POLICY WEBSITE

*For websites and social networks*

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- password.

## 3.7. Payment processors

For the processing of payments, we use payment processors who are themselves data controllers within the meaning of Art. 4 No. 7 GDPR. Insofar as they receive data and payment data entered by us in the ordering process, we thereby fulfill the contract concluded with our customers (Art. 6 para. 1 s. 1 lit. b GDPR).

These payment processors are:

- Stripe Payments Europe, Ltd., Ireland

## 3.8. Third parties

### 3.8.1. YouTube Videos

We use YouTube Videos for videos on the website. The provider is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. The provider processes usage data (e.g. web pages visited, interest in content, access times) and meta/communication data (e.g. device information, IP addresses) in the USA.

The legal basis for the processing is Art. 6 para. 1 s. 1 lit. a GDPR. The processing is based on consent. Data subjects may revoke their consent at any time by contacting us, for example, using the contact details provided in our privacy policy. The revocation does not affect the lawfulness of the processing until the revocation.

The legal basis for the transfer to a country outside the EEA are consents.

Further information is available in the provider's privacy policy at <https://policies.google.com/privacy>.

### 3.8.2. Google Tag Manager

We use Google Tag Manager for analytics and for advertisement. The provider is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. The provider processes usage data (e.g. web pages visited, interest in content, access times) in the USA.

The legal basis for the processing is Art. 6 para. 1 s. 1 lit. a GDPR. The processing is based on consent. Data subjects may revoke their consent at any time by contacting us, for example, using the contact details provided in our privacy policy. The revocation does not affect the lawfulness of the processing until the revocation.

The legal basis for the transfer to a country outside the EEA are standard contractual clauses. The security of the data transferred to the third country (i.e. a country outside the EEA) is guaranteed by standard data protection clauses (Art. 46 para. 2 lit. c GDPR) adopted by the EU Commission in accordance with the examination procedure under Art. 93 para. 2 of the GDPR, which we have agreed to with the provider.

We delete the data when the purpose for which it was collected no longer applies. Further information is available in the provider's privacy policy at <https://policies.google.com/privacy?hl=en-US>.

### 3.8.3. wordpress.com

We use wordpress.com to create websites. The provider is Aut O'Mattic A8C Ireland Ltd., 25 Herbert Pl, Dublin, D02 AY86, Ireland. The provider processes contact data (e.g. e-mail addresses, telephone

numbers), meta/communication data (e.g. device information, IP addresses), and master data (e.g. names, addresses) in the USA.

The legal basis for the processing is Art. 6 para. 1 s. 1 lit. f GDPR. We have a legitimate interest in setting up and maintaining a website and thus presenting ourselves to the outside world.

The legal basis for the transfer to a country outside the EEA are standard contractual clauses. The security of the data transferred to the third country (i.e. a country outside the EEA) is guaranteed by standard data protection clauses (Art. 46 para. 2 lit. c GDPR) adopted by the EU Commission in accordance with the examination procedure under Art. 93 para. 2 of the GDPR, which we have agreed to with the provider.

The data will be deleted when the purpose for which it was collected no longer applies and there is no obligation to retain it. Further information is available in the provider's privacy policy at <https://automatic.com/privacy/>.

### 3.8.4. Wistia

We use Wistia for video marketing. The provider is Wistia, Inc., 120 Brookline Street, Cambridge, Massachusetts, 02139, USA. The provider processes meta/communication data (e.g. device information, IP addresses) in the USA.

The legal basis for the processing is Art. 6 para. 1 s. 1 lit. f GDPR. We have a legitimate interest in making our website particularly lively through videos.

The legal basis for the transfer to a country outside the EEA are standard contractual clauses. The security of the data transferred to the third country (i.e. a country outside the EEA) is guaranteed by standard data protection clauses (Art. 46 para. 2 lit. c GDPR) adopted by the EU Commission in accordance with the examination procedure under Art. 93 para. 2 of the GDPR, which we have agreed to with the provider.

The data will be deleted when the purpose for which it was collected no longer applies and there is no obligation to retain it. Further information is available in the provider's privacy policy at <https://wistia.com/privacy>.

### 3.8.5. HubSpot

We use HubSpot for customer relationship management. The provider is HubSpot, Inc., 25 1st Street Cambridge, MA 0214, USA. The provider processes usage data (e.g. web pages visited, interest in content, access times), content data (e.g. entries in online forms), and meta/communication data (e.g. device information, IP addresses) in the USA.

The legal basis for the processing is Art. 6 para. 1 s. 1 lit. f GDPR. We have a legitimate interest in managing data in a simple and inexpensive way.

The legal basis for the transfer to a country outside the EEA are standard contractual clauses. The security of the data transferred to the third country (i.e. a country outside the EEA) is guaranteed by standard data protection clauses (Art. 46 para. 2 lit. c GDPR) adopted by the EU Commission in accordance with the examination procedure under Art. 93 para. 2 of the GDPR, which we have agreed to with the provider.

The data will be deleted when the purpose for which it was collected no longer applies and there is no obligation to retain it. Further information is available in the provider's privacy policy at <https://legal.hubspot.com/de/privacy-policy>.

### 3.8.6. Cloudflare

We use Cloudflare for application security. The provider is Cloudflare, Inc., 101 Townsend Street, San Francisco, CA 94107, USA. The provider processes content data (e.g. entries in online forms) and meta/communication data (e.g. device information, IP addresses) in the USA.

The legal basis for the processing is Art. 6 para. 1 s. 1 lit. f GDPR. We have a legitimate interest in increasing the security of our app by preventing malicious traffic from reaching our server.

The legal basis for the transfer to a country outside the EEA are standard contractual clauses. The security of the data transferred to the third country (i.e. a country outside the EEA) is guaranteed by standard data protection clauses (Art. 46 para. 2 lit. c GDPR) adopted by the EU Commission in accordance with the examination procedure under Art. 93 para. 2 of the GDPR, which we have agreed to with the provider.

The data will be deleted when the purpose for which it was collected no longer applies and there is no obligation to retain it. Further information is available in the provider's privacy policy at <https://www.cloudflare.com/en-gb/privacypolicy/>.

### 3.8.7. Google Analytics

We use Google Analytics for analytics. The provider is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Dublin, Ireland. The provider processes usage data (e.g. web pages visited, interest in content, access times) and meta/communication data (e.g. device information, IP addresses) in the USA.

The legal basis for the processing is Art. 6 para. 1 s. 1 lit. a GDPR. The processing is based on consent. Data subjects may revoke their consent at any time by contacting us, for example, using the contact details provided in our privacy policy. The revocation does not affect the lawfulness of the processing until the revocation.

The legal basis for the transfer to a country outside the EEA are standard contractual clauses. The security of the data transferred to the third country (i.e. a country outside the EEA) is guaranteed by standard data protection clauses (Art. 46 para. 2 lit. c GDPR) adopted by the EU Commission in accordance with the examination procedure under Art. 93 para. 2 of the GDPR, which we have agreed to with the provider.

The data will be deleted when the purpose for which it was collected no longer applies and there is no obligation to retain it. Further information is available in the provider's privacy policy at <https://policies.google.com/privacy?hl=en-US>.

### 3.8.8. Global LT

We use Global LT as an online training platform. The provider is Global LT Inc., 755 W. Big Beaver Road Suite 1700, Troy, MI 48084, USA. The provider processes content data (e.g. entries in online forms), meta/communication data (e.g. device information, IP addresses), and master data (e.g. names, addresses) in the USA.

The legal basis for the processing is Art. 6 para. 1 s. 1 lit. f GDPR. We have a legitimate interest in providing our employees with easily accessible training.

The legal basis for the transfer to a country outside the EEA are standard contractual clauses. The security of the data transferred to the third country (i.e. a country outside the EEA) is guaranteed by standard data protection clauses (Art. 46 para. 2 lit. c GDPR) adopted by the EU Commission in accordance with the examination procedure under Art. 93 para. 2 of the GDPR, which we have agreed to with the provider.

The data will be deleted when the purpose for which it was collected no longer applies and there is no obligation to retain it. Further information is available in the provider's privacy policy at <https://global-lt.com/privacy-policy>.

### 3.8.9. SalesViewer®

This website uses SalesViewer® technology from SalesViewer® GmbH on the basis of the website operator's legitimate interests (Section 6 paragraph 1 lit.f GDPR) in order to collect and save data on marketing, market research and optimisation purposes.

In order to do this, a javascript based code, which serves to capture company-related data and according website usage. The data captured using this technology are encrypted in a non-retrievable one-way function (so-called hashing). The data is immediately pseudonymised and is not used to identify website visitors personally.

The data stored by Salesviewer® will be deleted as soon as they are no longer required for their intended purpose and there are no legal obligations to retain them.

The data recording and storage can be repealed at any time with immediate effect for the future, by clicking on <https://www.salesviewer.com/opt-out> in order to prevent SalesViewer® from recording your data. In this case, an opt-out cookie for this website is saved on your device. If you delete the cookies in the browser, you will need to click on this link again.

## 4. Data processing on social media platforms

We are represented in social media networks in order to present our organization and our services there. The operators of these networks regularly process their users' data for advertising purposes. Among other things, they create user profiles from their online behavior, which are used, for example, to show advertising on the pages of the networks and elsewhere on the Internet that corresponds to the interests of the users. To this end, the operators of the networks store information on user behavior in cookies on the users' computers. Furthermore, it cannot be ruled out that the operators merge this information with other data. Users can obtain further information and instructions on how to object to processing by the site operators in the data protection declarations of the respective operators listed below. It is also possible that the operators or their servers are located in non-EU countries, so that they process data there. This may result in risks for users, e.g. because it is more difficult to enforce their rights or because government agencies access the data.

If users of the networks contact us via our profiles, we process the data provided to us in order to respond to the inquiries. This is our legitimate interest, so that the legal basis is Art. 6 para. 1 s. 1 lit. f GDPR.

### 4.1. Facebook

We maintain a profile on Facebook. The operator is Facebook Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland. The privacy policy is available here: <https://www.facebook.com/policy.php>. A possibility to object to data processing arises via settings for advertisements: <https://www.facebook.com/settings?tab=ads>.

We are joint controllers for processing the data of visitors to our profile on the basis of an agreement within the meaning of Art. 26 GDPR with Facebook. Facebook explains exactly what data is processed at [https://www.facebook.com/legal/terms/information\\_about\\_page\\_insights\\_data](https://www.facebook.com/legal/terms/information_about_page_insights_data). Data subjects can exercise their rights both against us and against Facebook. However, according to our agreement with Facebook, we are obliged to forward requests to Facebook. Data subjects will therefore receive a faster response if they contact Facebook directly.

### 4.2. Instagram

We maintain a profile on Instagram. The operator is Facebook Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland. The privacy policy is available here: <https://help.instagram.com/519522125107875>.

### 4.3. YouTube

We maintain a profile on YouTube. The operator is Google Ireland Limited Gordon House, Barrow Street Dublin 4. Ireland. The privacy policy is available here: <https://policies.google.com/privacy?hl=de>.

### 4.4. LinkedIn

We maintain a profile on LinkedIn. The operator is LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland. The privacy policy is available here: [https://www.linkedin.com/legal/privacy-policy?l=de\\_DE](https://www.linkedin.com/legal/privacy-policy?l=de_DE). One way to object to data processing is via the settings for advertisements: <https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>.

## 5. Changes to this privacy policy

We reserve the right to change this privacy policy with effect for the future. A current version is always available here.

## 6. Questions and comments

If you have any questions or comments regarding this privacy policy, please feel free to contact us using the contact information provided above.