

Privacy statement Continuous Learning

What is the general privacy policy of Continuous Learning?

- Continuous Learning respects the privacy of its (potential) customers and relations and all visitors to its website (www.continuouslearning.nl).
- Continuous Learning puts the security and confidentiality of your personal data first and handles your personal data with care.
- Continuous Learning only shares your data with parties it engages for the delivery of its services and products and with parties with whom it has to share data on the basis of legal obligations.

Why are your personal data important to us?

Continuous Learning processes your personal data because you:

- use or intend to use (one of) its products or services.
- enter or leave your details via other common channels, such as our software, e-mail, the website or by telephone.
- visit the website of Continuous Learning.
- have a business relationship with Continuous Learning.

For what purposes do we collect your personal data?

Communication.

We use your contact details to be able to contact you if necessary or to inform you about our services and to inform you about changes in our product range or to create a (demo) account for one of our products.

Execute contract.

If you are a customer or supplier of Continuous Learning, we will process your data for the preparation, conclusion and execution of the agreement.

Laws and regulations.

We process your personal data if we are obliged to do so on the basis of laws and regulations.

Why do we collect your personal data?

We process your data because:

- we need this information for entering into or executing the agreement
- we have a legal obligation.
- you have given permission to do so.
- we have a legitimate interest in doing so.

If you have given Continuous Learning permission to process your personal data for certain purposes, you can withdraw this permission at any time in the same way as you provided it.

What personal data does Continuous Learning collect?

Continuous Learning processes your personal data in various ways. Below you will find an overview of all personal data that we collect for a short or longer period:

1: Use of our products and services

We store all information that you enter via our software in a centralized database.

- Basic account information, such as first name, last name and email address to create or use an
- account as a player.
- If desired, tags or labels can also be created. Think of departments, functions, etc. However, we only do this on request and if there is a need for this in the interest of, for example, setting up a challenge.
- Information about the ranking if a challenge is in place (anonymized if necessary)
- Sessions from logged in on mobile devices, including meta-data such as device type and last active moment;
- Player learning data, such as questions received and answers given, the country from which the game is
- played or the product is used.

In addition, we collect data that arise during the use of the software.

- Error reports and log files are collected for quality improvement and security assurance. These are anonymized as much as possible.
- Ingame behavior as part of the learning process.
- Password, fictional practice name.

2. Billing

In order to create an invoice, we need the following information:

- Company Name
- The company's Chamber of Commerce number;
- The company's VAT number
- The company's IBAN number
- The address details of the company
- The company's phone number(s)
- The company's e-mail address(es)
- The business address
- The billing address

How long do we store your personal data?

Continuous Learning does not store your personal data longer than is strictly necessary to realize the purposes for which your data is collected.

What does that mean in concrete terms?

Your personal data will be stored as long as you are a customer of Continuous Learning or have a license for one of our products. If you end the customer relationship, Continuous Learning will store your data for

a maximum of one year, with the exception of data for which there is a legal obligation. This applies, for example, to invoices. For an overview of the retention obligation of invoices click <u>here</u>.

Your personal data is stored:

- as long as we do business together
- as long as you are our customer
- as long as we are required to do so by law.

Users of the software may request that all data be deleted. This is only possible by submitting a removal request to: <u>privacy@continuouslearning.nl</u>.

The data that will be removed is the account data, profile and links. After deletion, it can take 2 months before this data has actually disappeared from our backup.

Do we share your data?

Of course. In order to realize and further develop our products, we work together with a number of parties who create, host and service the technology for us.

We impose the obligation on these parties (by means of a processing agreement) to properly protect your personal data. For more information about this, see our website.

Continuous Learning does not sell your personal data to third parties. Furthermore, Continuous Learning will only share your data with our technical partners and parties if it is legally obliged to do so.

How do we secure your data?

We protect your data to prevent it from being lost or falling into the wrong hands. Some of the measures we take are:

- We take appropriate technical measures with the software to ensure that all data we collect is properly secured against misuse, loss, theft or unlawful processing. All connections to the web applications and via the API links are over an encrypted TLS connection.
- Only authorized staff members/third parties have access to your personal data;
- We share personal data with third parties via a secure connection
- We conclude (processors) agreements with third parties that process your personal data on our behalf, so that your privacy is guaranteed.

What rights do you have with regard to your personal data?

You have the right to view, correct or delete your personal data. In addition, you have the right to withdraw your consent to the data processing or to object to the processing of your personal data by Continuous Learning. In some cases you also have the right to data portability. This means that you can submit a request to us to send the personal data we have about you in a computer file to you or another organization mentioned by you.

You can send a request for access, correction, deletion, data transfer of your personal data or request for withdrawal of your consent or objection to the processing of your personal data to privacy@continuouslearning.nl

To ensure that the request for access has been made by you, we ask you to send a copy of your proof of identity with the request. Make your passport photo, MRZ (machine readable zone, these are the two or three lines at the bottom of the front page of the passport or on the back of an ID card), ID number and

Citizen Service Number (BSN) black in this copy. This is to protect your privacy. We will assess where we must and can comply with your request. We will respond to this as soon as possible.

If there are complaints about our data processing, we request that you report this to our Data Protection Officer as soon as possible via <u>privacy@continuouslearning.nl</u>. We hope to find a solution together. In addition, it is possible to submit a complaint to the national supervisory authority, the Dutch Data Protection Authority. You can do that via the following <u>link</u>.

What if the privacy policy of Continuous Learning changes?

The rules regarding the protection of personal data and our services may change. We therefore reserve the right to make changes to this privacy statement. You can always find the most current privacy statement at https://www.continuouslearning.nl.

This statement was last amended on February 13, 2023.