# **Privacy Policy**

(version 4.5.2021)

While you're on our apps or websites ("Services" going forward), we'll collect and store information about you in accordance with this policy.

This Privacy Policy (which we'll refer to as "Policy" going forward), describes practices with regards to our Services, e-mails, affiliates, virtual and in-person events, offline sales, and additional marketing and sales activities.

### WHO COLLECTS THE DATA

Cikumas GmbH, a Swiss corporation with registered offices in Kilchberg, Switzerland and domicile at Seestrasse 40, 8802 Kilchberg, Switzerland is the collector of data on Cikumas GmbH sites and Services. We can be reached by email: <a href="mailto:support@classowl.com">support@classowl.com</a> or via phone at +41 (44) 500 2507. Our DPO, Peter Daniel Ketelsen can be reached by email at pdk@cikumas.com, or by phone at +41 (44) 500 2507.

### WHAT DATA IS COLLECTED

Cikumas will never collect data about our users without clearly stating what information we are requesting and what we will use it for. The following information are data that we collect:

- Your first and last name, e-mail address, phone number
- School information including name, physical address, size of school
- Geographical location, IP address, including country, state or province
- Behavioral or demographical information
- Data from marketing opt-in lists, campaigns, surveys, or publicly available information
- Collaboration information

### HOW IS THE DATA COLLECTED

Through your interaction with us or use of our Services, we may collect the following personal information that identifies you as an individual:

• Information you provide through form submissions on our Services. This includes when

you contact us, subscribe to our marketing communications, download collateral, register or attend a Cikumas GmbH event or partner event, and purchase products or services.

- Information you provide when applying for a job.
- Information that you submit to us or Cikumas GmbH's employees when you want to engage in business or potential business with us.
- Information you provide us through our Services, in-personal conversations or events.
- Information from surveys, reviews, or inquiries that you voluntarily take part in.
- Information you submit to us via social media channels.

We don't intentionally solicit, collect or process data for anybody under the age of 16, unless the parents/guardians or the organisation/school provided their comprehensive consent either directly or through a customer or partner.

We collect data via third-party advertisers, such as Google Adwords remarketing service. It could mean that we advertise to previous visitors who haven't completed a task on our site, for example using the contact form to make an enquiry. This could be in the form of an advertisement on the Google search results page, or a site in the Google Display Network.

### WHY IS DATA COLLECTED

We collect your data to optimize the information we send to you and determine whether our Services would be a good fit for you. In those cases where we use legitimate interest as a lawful basis for our data processing, we will always balance our interest with your right to data privacy. The legitimate interest basis makes processing lawful only if it is necessary of the controller.

Transparency in this matter means it shall be clear to you which data is used and how it's used. A balancing test requires us to take into consideration factors such as:

- That our interest as controller is significant compared to the impact on your data privacy
- Identifying and targeting educational institutions that have an interest and need for our Services
- Promoting our Services to interested potential customers
- Nurturing relationships with interested potential customers, whether we initially encountered them via telephone, web or in-person.
- Managing customer relationships, to better communicate any updates or changes they might be interested in

### HOW IS COLLECTED DATA USED

We only collect or process your data when we are offering a service within the bounds of a contract, when we have consent, or when we have a legitimate interest. Your **consent** must be clear, unambiguous and freely given. When we request information, we have to tell you what we'd like to know and why.

**Legitimate interests** are uses that are necessary to provide a product or service, or those that could be reasonably expected by the person whose information is being collected. If no activity, interest, intent or need can be identified within a 3-month period, we delete your data. Please note that third-party sites may retain it. The only time we will retain your personal information for longer than is outlined in this Policy is when it is required by law.

## DATA PROCESSORS

Data processors are third parties with whom we have contracted to assist in our communication to users, customers, partners and prospects. They are not allowed to process your personal information unless we instruct them to do so. They will not share your personal information with any other organization. They will secure and retain your data for the period we specify. In those cases where the data resides in a non-EU country, we indicate the location next to the processor's name.

#### Adobe Sign

Adobe Sign is used to digitally sign documents. Adobe will store some information about the signed documents or signature/the signing and the event in addition to an audit trail. We have signed Standard Contractual Clauses which ensure that any data transfer has an adequate level of data protection.

#### **Amazon Web Services**

We use AWS for both our data hosting (all within Switzerland or the EU) and domain hosting. AWS has strict data privacy guidelines which accord with this agreement. AWS helps all of Cikumas GmbH's products run well and stay online. GDPR's right to be forgotten or the data owner's right to inquire, amend or delete their data is always warranted. AWS is ISO 27001 certified for technical measures, ISO 27017 certified for cloud security, ISO 27018 certified for cloud privacy.

#### **Google Analytics**

Google Analytics is used to analyse the use of our Services. Our analytics service provider generates statistical and other information about our Services use by means of cookies. The

information generated relating to our Services is aggregated and used to create trending reports about the use of our Services. It is used to improve how Cikumas products function and perform.

#### **Google Firebase**

Google Firebase is used to send push notifications to the users of the app and to analyse the usage of our Services. It generates statistical and other information about the Services using Instance IDs. The information generated relating to our app is aggregated and used to create trending reports about the use of our app. It is used to improve how Cikumas products function and engage with their users.

#### Crazy Egg

Crazy Egg is used to analyse the traffic, clicks and behavior on our landing page. It generates statistical and other information about the usage of our Services by means of cookies. It is used to improve how Cikumas products function and perform.

#### Consultants

We may use consulting companies in our day-to-day operations. They must all have signed a confidentiality and non-disclosure agreement and a data processing agreement.

#### YouTube API

We use YouTube's API as a third party integration to enrich the content available on the platfform. We are therefore also compliant and bound with the <u>YouTube Terms of Service</u> and their <u>Google's Privacy Policy</u> as a whole.

### YOUR DATA RIGHTS

When it comes to your personal data, you have rights:

- You have the right to know whether we have your information.
- You have the right to access any information we have about you.
- You have the right to correct or update your information.
- You have the right to unsubscribe from our marketing materials, whenever you choose.
- You have the right to tell us not to process your data for marketing.

• You have the right to withdraw consent to use your information. (This withdrawal does not retroactively affect the lawfulness of any processing, nor does it affect processing that does not rely on consent.)

- You have the right to talk about your personal data with our Data Protection Officer.
- You have the right to lodge a complaint if you think we've mishandled your data.
- You have the right to make us delete any information you've consented to share. In some cases these rights are subject to certain conditions and limitations. If you would like to learn more about these rights please contact our Data Protection Officer. If you want to exercise any of these rights, you have a number of different ways to do so. You can:
  - <sup>o</sup> Contact our DPO via email
  - <u>Lodge a complaint with a supervisory authority.</u> All requests will be processed within one month.