

# Privacy Policy

Culture Academy AB

Last revised March 21 2023

## 1. Scope of this policy

This privacy policy (the “Policy” or the “Privacy Policy”) describes how Culture Academy AB collects, uses, consults or otherwise processes an individual’s personal data. For the purposes of this policy, Culture Academy” “refers to Culture Academy and its entity Earned Secrets AB, a company incorporated under the law of Sweden, having its registered seat and its offices at Björklundabacken 10, 436 57 Hovås, Sweden.

email address; [info@cultureacademy.se](mailto:info@cultureacademy.se). In all cases described in this Policy, Culture Academy will process your personal data as a data controller. We are committed to protecting the privacy of our users and customers. This Privacy Policy is especially directed at: visitors and subscribers of the websites of Culture Academy; natural persons contacting us through the contact or other forms available on the websites; subscribers to our newsletter(s); users signing in to use our courses; users signing in to download eBooks or diplomas; users signing in to attend and/or watch webinars; users signing in to use free content in the platform.

This Privacy Policy is intended to inform you how we gather, define, and use information that could identify you, such as your name, email address, address, other contact details, online identifiers or other information that you provide to us when using our websites or when relying on our services. Please take a moment to read this Privacy Policy carefully.

This policy is to be read as consistent with the Cookie Policy. This policy includes a description of your data protection rights, including a right to object to some of the processing activities we carry out.

## 2. Contacting us

If you have general questions about your account or how to contact Customer Service for assistance, or for questions specifically about this Privacy Policy or use of your personal information please send us an email at [info@cultureacademy.se](mailto:info@cultureacademy.se).

Please note that if you contact us to assist you, for your safety and ours we may need to authenticate your identity before fulfilling your request.

## 3. Collection of Information

The purpose of the website is to provide users with online education in communication and self leadership and create an on-line community for users who want to publish and/or assess content in forums connected to Culture Academy. As part of our effort to provide you with the on-line content and create this on-line community, we receive and store information about you such as:

### a) Personal Information

Content published on the forum of [cultureacademy.se](http://cultureacademy.se) is accessible by all registered users. However, certain Culture Academy features and services may require registration. Upon signing-up, an account is created for the user ("Account"). Users who sign-up on-site are required to confirm their registration by clicking on an activation link which is sent to them via email. All active user accounts have the capability to use the forum. Users are required to provide part or all of the following information below, depending on the features or services they wish to access.

First and Lastname

Email address

Company name, size, industry,

State and country

Job title, focus and level

Purchasing authority

Once you complete activation, and you will be able to create your profile, ("Profile").

## b) Other Information

### **Non-personal information**

We automatically track and collect certain non-personal information such as website navigation data, Internet Protocol (“IP”) addresses, timestamps and URLs. We use this information to do internal research on our users’ demographics, interest, and behavior to better understand, protect and serve you and our Culture Academy platform.

### **Correspondence information**

If you send us personal correspondence, such as emails or letters, or if other users or third parties send us correspondence about your activities or postings on our Website, we may store such information on our servers.

### **Payment Information**

To protect you against fraud, unauthorized transactions (such as money laundering), claims and other liabilities, we only collect an identification number and order details which enable us to match each user to the payments he makes. We do not collect credit card information. We allow our third party payment vendor to collect information for the purpose of collecting fees from users on the website. We do not have access to the payment information that you provide to our third party payment vendor and this information is subject to the privacy policy of the third party payment vendor. For more information regarding what payment information our third party payment vendor collects and how it uses this information, please see their privacy policy.

## 4. Use of Information

We use your information to provide, analyse, administer, enhance and personalize our services and marketing efforts, to process your registration, your orders and your payments and to communicate with you on these and other topics. For example, we use information to:

1. We use your Information in order to resolve disputes; troubleshoot problems; help promote safe matching; collect fees owed; measure consumer interest in Services; inform you about offers, products, services, and updates; customize your experience; detect and protect us against error, fraud and other criminal activity; enforce our TOS; and as otherwise described to you at the time of collection. We may compare and review your Business Information for errors, omissions and for accuracy.
2. We use your e-mail to send you system e-mails about the functionality of our Website that you cannot opt out from and you will have to receive if you want to use our website. If you want to stop receiving our system e-mails, you will have to de-activate your Account by contacting [info@cultureacademy.se](mailto:info@cultureacademy.se).

3. We use your e-mail associated with your Account in order to send you newsletters and promotions in conjunction with your use of our Services. If you do not wish to receive newsletters you may unsubscribe by clicking the unsubscription link in the newsletter e-mail. We may also send you newsletters which include third party's offers. If you do not wish to receive these third party offers, you may unsubscribe by clicking the unsubscribe link in the newsletter e-mail.

4. We may use your Business Information in order to provide benchmark analysis and aggregate statistics. This particular Business Information will be anonymized, will not contain personal identification and will not be transferred or sold to third parties in any way or format that identifies you.

5. We use Website navigation data to operate and improve the Website. We may also use Website navigation data alone or in combination with your Business Information to provide aggregated information about e-learning industry.

6. We collect the IP Addresses to track when you use our Website. We use IP Addresses to monitor the regions from which you navigate our Website and sign-up to use our Services. Your IP-address is also registered for statistical purposes and to better our advertising and layout of the Website. In specific, we use your IP Addresses for the following reasons:

a. Send the most appropriate advertising based on geographic area or information derived from your IP address. Many IP addresses are commonly associated with Internet service providers, universities, or major corporations in specific regions or localities. Aggregate information derived from IP addresses may also be reported to advertisers.

b. Estimate the total number of Internet users visiting our Website from specific countries or regions of the world.

c. Assist third party advertisers to track effectiveness of the promotions they run on our Website, visits to and business at third party's websites.

7. For users other than those only signing in to the free courses or live-stream webinar of the website, we do not share your full name, e-mail, phone number and job title with third parties for their marketing purposes as a matter of course. However, if we decide to share such information, you shall be notified and shall have the option to opt-out from providing us with your personal information above for this purpose.

We do not transfer, sell or rent your Business Information to third parties for their marketing purposes other than what is stated in this Privacy Policy. We request only the information that we need to operate our Services and improve our Website's user experience.

## Use of Business Information by other third parties

1. We partner with third-party advertising networks to either display advertising on our Website or to manage our advertising on other Websites. These ad network partners do not collect and do not have access to any Information. They may, however, anonymously track your on-line usage by various means, for example, through the use of cookies.
2. We make reasonable efforts to make sure that our users, who use our Services, will use the information available to them solely for Culture Academy related purposes. However, we cannot control their use of that information outside this scope and we are not responsible for such unauthorized uses.
3. Culture Academy reserves its right to share your Information with a third party in case of sale merger, control changes, reorganization or liquidation of the Company. All actions will naturally be completed in compliance with applicable laws of personal data and privacy. Our legal basis for collecting and using the personal information described in this Privacy Policy will depend on the personal information concerned and the specific context in which we collect and use it. We will normally collect personal information from you where we need the personal information to perform a contract with you (for example to provide our services to you), where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms (for example our direct marketing activities in accordance with your preferences), or where we have your consent to do so (for example, for you to participate in specific surveys and focus groups). In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person (for example to prevent payment fraud or confirm your identity). For questions about our use of your personal information (including legal basis and transfer mechanisms we rely on) please contact our Data Protection Office/Privacy Office by mail at; [info@fcultureacademy.se](mailto:info@fcultureacademy.se)

### **Protection of Information**

We use reasonable administrative, logical, physical and managerial measures to safeguard your personal information against loss, theft and unauthorised access, use and modification. These measures are designed to provide a level of security appropriate to the risks of processing your personal information. Indicatively:

1. All our employees, independent contractors and agents have executed non-disclosure agreements, which provide explicit confidentiality protections. Any employee, independent contractor or agent who violates such privacy and/or security policies is subject to possible termination and civil and/or criminal prosecution.
2. We do not make any of your Information available to third parties for their marketing purposes. Culture Academy software runs on individual servers and no data given or collected is shared with other social media platforms. If however, we share your Information with third parties, we will notify you. Please note that no transmission over the internet can guarantee confidentiality and non-disclosure, and as such, you transmit at your own risk.
3. We use robust security measures to protect data from unauthorized access, maintain data accuracy, and help ensure the appropriate use of data. When the Services are accessed using the internet, Secure Socket Layer (SSL) technology protects your Information, using both server authentication and data encryption. These technologies help ensure that your Information is safe, secure, and only available to you and to whom you have granted access.

4. We do not tolerate Spam. To report Culture Academy –related spam, please contact us at [info@cultureacademy.se](mailto:info@cultureacademy.se). You may not use our communication tools to send spam or otherwise send content that would violate our TOS. We may check for spam, viruses, phishing attacks and other malicious activity or illegal or prohibited content of the Website, but we will not permanently store messages sent through these tools.

5. Culture Academy does its utmost to secure communications and data storage in order to protect confidentiality of your Information against loss and interception by third parties. However, it is important to know that there is no zero-risk against loss or interception by others of your Information. You are responsible for maintaining the security and confidentiality of your Account's username and password.

6. Storage of Information:

We save your Information in our database in order to improve our Website's and user experience and in accordance with our TOS. If you wish that your Business Information be permanently deleted from our database when you stop using our Services, please notify us at [info@cultureacademy.se](mailto:info@cultureacademy.se)

7. Information and Rights

Once you have provided your Personal Data, you have several rights, which you can in principle exercise free of charge, subject to statutory exceptions. These rights may be limited, for example if fulfilling your request would reveal Personal Data about another person, or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping. To exercise any of your rights, you can file a request here [info@cultureacademy.se](mailto:info@cultureacademy.se)

Should you have unresolved concerns, you have the right to lodge a complaint with a Supervisory Authority where you live or where you believe a breach may have occurred. We encourage you to come to us in the first instance but, to the extent that this right applies to you, you are entitled to complain directly to the relevant Supervisory Authority.

1. Right to withdraw consent

Wherever we rely on your consent, you will be able to withdraw that consent at any time you choose and at your own initiative by logging into your account on our website (if you have one) or by contacting us at [info@cultureacademy.se](mailto:info@cultureacademy.se). The withdrawal of your consent will not affect the lawfulness of the collection and processing of your data based on your consent up until the moment where you withdraw your consent.

2. Right to access and rectify your data

You have the right to access, review, and rectify your Personal Data. You may be entitled to ask us for a copy of your information, to review or correct it if you wish to rectify any information like your name, email address, passwords and/or any other preferences, you can easily do so by logging into your account on our website (if you have one) or by contacting us here [info@cultureacademy.se](mailto:info@cultureacademy.se). You may also request a copy of the Personal Data processed as described in this Privacy Policy.

3. Right to erasure

You have the right to erasure of your Personal Data processed by us as described in this Privacy Policy in case it is no longer needed for the purposes for which the Personal Data was initially collected or processed or in the event you have withdrawn your consent or objected to processing as described in this Privacy Policy and no other legal ground for processing applies. Should you wish to have your Personal Data erased, please file a request here [info@cultureacademy.se](mailto:info@cultureacademy.se).

#### 4. Right to restriction of processing

Under certain circumstances, you may ask us to restrict the processing of your Personal Data. This is for example the case when you contest the accuracy of your Personal Data. In such event, we will restrict the processing until we can verify the accuracy of your data. Should you wish to have your Personal Data restricted, please file a request here [info@cultureacademy.se](mailto:info@cultureacademy.se).

#### 5. Right to object to processing

Under certain circumstances you may object to the processing of your Personal Data, including where your Personal Data is processed for direct marketing purposes. If you no longer want to receive certain communications from us via email contact us at [info@cultureacademy.se](mailto:info@cultureacademy.se).

#### 6. Right to data portability

Where you have provided your data directly to us and where the processing is carried out by automated means and based on your consent or the performance of a contract between you and us, you have the right to receive the Personal Data processed about you in a structured, commonly used and machine-readable format, and request portability of your Personal Data.

#### 8. Other websites

Culture Academy website may contain links to sites operated by third parties whose policies regarding the handling of information may differ from ours. These websites and platforms have separate and independent privacy or data policies, privacy statements, notices and terms of use, which we recommend you read carefully. In addition, you may encounter third party applications that interact with Culture Academy services.

#### 9. Children

We do not knowingly collect or solicit Personal Data from anyone under the age of 18. In the event we learn that we have collected Personal Data from a child under the age of 18 without verification of parental consent, steps will be taken promptly to remove that information. If you believe that we have or may have information from or about a child under 18 years of age, please contact us at [info@cultureacademy.se](mailto:info@cultureacademy.se).

#### 10. Changes to this Privacy Policy

We reserve the right to modify and update this Privacy Policy from time to time. We will bring these changes to your attention should they be indicative of a fundamental change to the processing or be relevant to the nature of the processing or be relevant to you and impact your data protection rights.

#### 11. Data Retention

We retain your Personal Data for as long as is required to fulfill the activities set out in this Privacy Policy, for as long as otherwise communicated to you or for as long as is permitted by applicable law.

#### 12. Applicable Law

The validity and interpretation of this Privacy Policy shall be governed by the laws of Sweden. For the purposes described in this policy, your personal data will be transferred to the Sweden. When such transfer happens, we ensure that it takes place in accordance with this policy. For any complaints that cannot be resolved with us directly and fall within the scope of EU legislation, we follow the law of European law on GDPR.