

	<b>PRIVACY POLICY</b>	Document : PRIVACY POLICY		
		Category: WEBSITE		
		Doc. Ref. :	KA000103	Rev. 01
		Date :	10-06-2020	

## Scope

This Privacy Policy (the “Privacy Policy”) describes how Klass Academy collects, uses and discloses information from and about you when you visit the Klass Academy website: <https://klassacademy.com/> (“Website”), applications and virtual learning environments, as well as your ability to control certain uses of that information.

Klass Academy respects your privacy and is committed to protecting it through our compliance with this Privacy Policy. By accessing or otherwise using the Website, you agree to the terms and conditions of this Privacy Policy.

We regularly review our compliance with this Privacy Policy. Whenever we receive a formal complaint, we will endeavour to contact the person who made the complaint to attempt to resolve their concerns. If you have any questions about the use of your information, or the contents of this Privacy Policy, please contact us at [contact@klassacademy.com](mailto:contact@klassacademy.com)

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## Collection of Information

### Information You Provide

Klass Academy collects information from you when you choose to provide it to us. For example, we may collect your information when you submit a registration form, otherwise provide information to us through the Website, or otherwise contact us. The information we collect may include personal information as listed (but not exhaustive): name, address, e-mail address, telephone number, date of birth, government issued identifier, prior educational background information, work experience, and the content of any communications that we exchange, as well as non-personal information.

### Information Collected from Other Sources

Where permitted by law, we may collect or receive information about you from companies to whom you indicate that you would like to learn more about the training available, companies that are our partners, or other entities connected to Klass Academy in some form (collectively “Other Sources”) in order to update or supplement the

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information that you provide. We may use this information to help us maintain the accuracy of the information we collect, to target our communications so that we can inform you of products, services or other offers that may be of interest to you, and for internal business analysis or other business purposes.

#### Our Combination of Your Information

We may combine the information we receive from and about you, via the Websites and from Other Sources to help us tailor our communications to you and to improve the Websites.

#### Failure to Provide Personal Information

Failure to provide certain information may make it difficult or impossible for you to access some services through the Websites (for example, to register for and complete Training). You should ensure that personal information submitted to us is accurate and up-to-date. For example, we need a current email address to communicate with you about the Training in which you choose to enrol, and provide the certificate following completion of the Training.

#### Children's Privacy


We do not direct the Website to, nor do we knowingly collect any personal information from, children under 16.

## How we use your information

#### Purposes for Collecting and Processing Personal Information

We process personal information under the following legal bases:

- To fulfil a contract or take steps linked to a contract, including:
  - providing our services;
  - verifying your identity;
  - taking payments;
  - communicating with you.
- To conduct Klass Academy's business and pursue our legitimate interests in marketing our business, ensuring that we conduct our business in line with our objectives, improving and developing our products and services, and keeping our records accurate and up to date. This includes:
  - using your information to provide products and services you have requested and responding to any comments or complaints you may send us;
  - personalising your experience on the Website and in any training in which you choose to enrol and to help us to better respond to your individual needs;
  - targeting advertising to groups of individuals with similar interests or characteristics through services offered by third party Service Providers, such as Facebook Custom Audiences or other similar business tools;
  - developing new products or services or conducting analyses to enhance current products and services;
  - reviewing the usage and operations of the Website and analysing and improving the Website (we continually strive to improve the Websites based on the information and feedback we receive from you);

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- contacting you for legitimate business purposes;
  - using personal information to invite individuals to take part in market research;
  - where consent is not required by applicable law, for direct marketing purposes;
  - protecting the security and functionality of the Website, including using personal information you provide to investigate any complaints received from you or from others about our Website or our products and services.
- Where you give us consent. This includes:
    - where consent is required by applicable law, sending you direct marketing in relation to our relevant products and services, or other products and services provided by Klass Academy;
    - on other occasions where we ask you for consent, using the data for the purpose which we explain at that time.
  - For purposes which are required by law. This includes:
    - in response to requests by government or law enforcement authorities conducting an investigation;
    - using personal information in connection with legal claims, compliance, regulatory and investigative purposes as necessary, including disclosure of such information in connection with legal process or litigation.
  - For reasons not described in this Privacy Policy where the reason is compatible with the purpose for which we originally collected your information and where such use is lawful.

## How we disclose your information

Klass Academy may share your information with other entities or individuals in the following circumstances:

- a. **Educational Accreditation Partners:** We may share your information with an accredited educational organisation with whom we collaborate on training (“Partner”) in order to process your information, track your participation in the Training, and/or fulfil our contracted responsibilities to the accredited body. Once we share your personal information with the accreditor, Klass Academy does not maintain control over the Klass Academy’s Partner’s use of your personal information. We also share de-identified, aggregate, pseudonymous or anonymous information with the accreditor for their own research and analytics purposes. Klass Academy Partner’s use of your information is subject to its privacy policy.
- b. **Service Providers:** We may share your information with third parties that provide business, professional, or technical support functions for us. In particular, we can use third-party providers for website hosting, maintenance, marketing services, courier services, certification services, business operations, payment services, and identity verification services (“Service Providers”). These Service Providers are only given access to your information to the extent necessary to process your information and/or provide services to Klass Academy, and they are prohibited from using or sharing your information for any other purposes. Where permitted by law, Klass Academy discloses limited information about you to Service Providers to serve relevant advertising on third party platforms to you or to other audiences.

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- c. **Your Employer:** We may share your information with your employer, in the event that the employer is paying for your training (“Your Employer”). Information disclosed in this case shall include Training performance information, unless otherwise expressly agreed in writing with Klass Academy.
- d. **Legal Matters; Safety:** We access or share your information to satisfy any applicable law, regulation, legal process, or governmental request; in connection with an investigation on matters related to public safety; as permitted by law; or otherwise as required by law. We may disclose your information to protect the security of the Training, the Website, servers, network systems, and databases. We also may disclose your information as necessary if we believe that there has been a violation of our Terms of Use (including investigation of potential violations thereof), any other legal document or contract related to the Websites, or the rights of any third party.
- e. **Fraud; Security:** We access and disclose your information to detect, prevent, or otherwise address fraud, security or other technical issues.
- f. **Consent; Other:** We share information with third parties when we have your consent, or otherwise as described to you at the point of collection.

## Information security and data retention

We are committed to protecting the security of your information. We maintain what we believe to be appropriate physical, electronic, and managerial procedures to safeguard and secure your information and to prevent unauthorized access, maintain accuracy, and ensure appropriate use of your information. The accuracy, safety, and security of your information also depend on you. Where we have given you or where you have chosen a password for access to certain parts of the Websites, you are responsible for keeping this password confidential. We ask that you not share your password with anyone. Even though we do our best to protect your information, the transmission of information via the internet is not completely secure, and we cannot guarantee our security measures. We are not responsible for any unauthorised access to or acquisition of your information.

We retain your personal information for as long as we have a relationship with you. We also may retain your personal information for a longer period of time which enables us to:

- Maintain business records for analysis and/or audit purposes;
- Comply with record retention requirements under the law;
- Defend or bring any existing or potential legal claims;
- Address any complaints regarding the services;
- Enforce our commercial agreements;
- Support our legitimate interests, as described in this Privacy Policy.

## Accessing and managing your personal information

If you are enrolled in a Training, you may access and/or update your personal information through your user profile.

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In some instances, you may be eligible to (a) ask us for a copy of your personal information; (b) correct, delete or restrict processing of your personal information; and (c) obtain the personal information you provide to us in a structured, machine readable format. In addition, you may have the right under applicable law to object to the processing of your personal information in some circumstances.

Your rights regarding your personal information may be limited, for example, if fulfilling your request would reveal personal information about another person or would infringe the rights of a third party (including our rights), or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping. We will inform you of the relevant exemption upon which we rely when responding to any request you make.

Our use of certain personal information is necessary for us to provide information to you about the Training or to provide services to you through the Website or otherwise. If you choose not to provide this personal information or request that Klass Academy delete or restrict the processing of this personal information, you may not be able to participate in the Training, and we may not be able to provide you with other services, including those provided through the Website or advertised about the Training.


## Additional Information

We may collect and disclose for a business purpose the following categories of personal information:

- **Contact Information and Identifiers:** including real name, alias, address, unique personal identifier, online identifier, IP address, email address, phone number, account name, or other similar identifiers;
- **Customer Records:** such as name, signature, government issued identifier, physical characteristics (profile photograph), education, employment, bank account number, credit card number, debit card number, or other financial information (payment history);
- **Usage Data:** including internet or other electronic network activity information, such as browsing history, search history, and information regarding a consumer's interaction with an internet website, application, or advertisement;
- **Employment History:** including professional or employment-related information;
- **Education Information:** including information about education history or background;
- **Protected Classifications:** including race, colour, sex, age, religion, national origin, disability and citizenship status.

### Purposes for Collecting Personal Information

We may collect the personal information identified above to communicate with you, for advertising and marketing purposes, to provide and improve our services, and other purposes set forth in Purposes for Collecting and Processing Personal Information above.

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Categories of Third Parties with which Personal Information is shared.

We may share personal information identified above with the following categories of third parties:

- Distributors;
- Educational Accreditation Organisations;
- Third-party providers that serve business, professional or technical support functions;
- Your Employer;
- Third parties for legal matters or safety purposes.
  
- The right to request deletion of the personal information that we have collected from you, subject to certain exemptions (for example, where the information is used by us to detect security incidents, debugging or to comply with a legal obligation).
- The right to request more details about the personal information we collect and how and why we use and share it, including the categories of personal information we have collected about you, the categories of sources for personal information we collect, the business or commercial purposes for collecting personal information, and the categories of third parties with which we share personal information.

You can submit a copy, deletion, or right-to-know request online by contacting us at [contact@klassacademy.com](mailto:contact@klassacademy.com)

#### Public Forums; Publicly Available Content

Any information you may disclose through the Website, such as on message boards, in chat rooms, or on other public areas, such as on webinars that you may attend as part of a training or coaching, may be viewed by others, such as other learners or learning facilitators. Please exercise caution when disclosing personal information in these public areas.

#### Third-Party Content

The Website may also offer you the ability to interact with content provided by third parties not affiliated with Klass Academy (“Third-Party Content”). Third-Party Content linked to or embedded on the Website is governed by the privacy policies of those third parties. Your use of Third-Party Content is subject to each site’s privacy policy, which may be different from ours. We have no control over the information that is collected, stored, or used by Third Party Content.

#### Changes to This Privacy Policy

We review this Privacy Policy from time to time and reserve the right to make changes to this Privacy Policy at any time.

You may direct any questions or concerns regarding this Privacy Policy to [contact@klassacademy.com](mailto:contact@klassacademy.com)

You also have the right to file a complaint with your Data Protection Authority.