

## Privacy Policy – DRIEAM B.V.

Last updated: October 16<sup>th</sup>, 2019

Drieam has prepared this privacy policy to describe our practices regarding the processing of personal data. The processing of personal data collected from our websites, apps and other related services (all together “Services”) shall be limited to the purposes described in this privacy policy.

IMPORTANT NOTICE: This privacy policy does not govern the collection, use, or disclosure of personal data through the Service by the educational institution which has given you (or your child) access to the service, or which is providing a course you are taking via the Services. Please contact the educational institution for their privacy practices.

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## **1. PERSONAL DATA**

### DATA YOU PROVIDE TO US.

We collect information from you, such as first and last name, e-mail and mailing addresses and professional title and in “Eduframe” we collect your password as well when you create an account to log in to our network.

If you order Services on our website or apps, you provide us or our third party payment processor with information necessary to complete the transaction, which may include your name, credit card information (only in the application ‘Eduframe’), billing information, and shipping information. We also may retain information on your behalf, such as files and messages that you store using your account. If you provide us feedback or contact us via e-mail, we will collect your name and e-mail address, as well as any other content included in the e-mail. When you participate in one of our surveys, we may collect additional profile information. We also collect other types of personal data and demographic information that you provide to us voluntarily.

### DATA COLLECTED VIA TECHNOLOGY

To make our Services more useful to you, our servers (which may be hosted by a third party service provider) collect information from you, including browser type, operating system, Internet Protocol (IP) address (a number that is automatically assigned to your computer when you use the Internet, which may vary from session to session), domain name, unique device identifiers, information about how you use our Services and/or a date/time stamp for your visit. We also use cookies and web beacons (as described below) and navigational data like Uniform Resource Locators (URL) to gather information regarding the date and time of your visit and the solutions and information for which you searched and which you viewed. Like most Internet services, we automatically gather this data and store it in log files each time you use our Services.

“COOKIES” are small pieces of information that a website sends to your computer’s hard drive while you are viewing a website. We may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer until you delete them) to provide you with a more personal and interactive experience on our websites.

“WEB BEACONS” are digital images we use to log information on our websites and in our emails. We use web beacons to manage cookies, count visits, and to learn what marketing works and what does not. We also use web beacons to tell if you open or act on our emails.

“FLASH COOKIES” are used to store your preferences such as volume control or to display content based upon what you view on our websites to personalize your visit. Third party partners who provide certain features on our websites, such as videos, may place Flash cookies on your device. They may use Flash cookies to track your web browsing activity and to display personalized advertising. Flash cookies are different from other cookies because of the amount of, type of, and way in which data is stored. Cookie management tools provided by your browser usually will not remove Flash cookies. To learn more about Flash cookies, who has placed Flash cookies on your device, and how to manage privacy and storage settings for Flash cookies click here: [http://www.macromedia.com/support/documentation/en/flashplayer/help/settings\\_manager.html#117118](http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager.html#117118). We do not control the privacy practices of the third parties who place or track Flash cookies and this privacy policy does not cover their practices. You should visit the privacy policies of companies who place Flash cookies to understand their practices.

“ANALYTICS” use cookies, script tags and scripts to collect and store information such as how users interact with our apps, browser and site performance metrics, errors users encounter when using our apps, device identifiers, how often users visit the websites, what pages they visit, and what

other sites they used prior to coming to the websites. We use the information we get from Google Analytics only to improve our websites, our apps, and our Services. Please see the following links for more information about Google Analytics: [http://www.google.com/privacy\\_ads.html](http://www.google.com/privacy_ads.html), <http://www.google.com/privacy.html>, and <http://www.google.com/analytics/tos.html>. We do not tie the information gathered using third party analytics to your personal data.

While we and others give you the choices described in this privacy policy, there are many ways web browser signals and other similar mechanisms can indicate your choice to disable tracking, and we may not be aware of or honour every mechanism.

### BLOGS/FORUMS

Our Services may offer a publicly accessible blog and community forums. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them. Anytime you post on our blog please be aware that you may be posting using a third party application and we have no access or control over this information. Our privacy policy does not cover the practices of these third parties. Your interaction with these third party applications is governed by the privacy policy of the company providing it.

### TESTIMONIALS

We display personal testimonials of satisfied customers on our websites in addition to other endorsements. With your consent we may post your testimonial along with your name. If you wish to update or delete your testimonial, you can contact us at [support@drieam.com](mailto:support@drieam.com).

## **2. SPECIAL AND/OR SENSITIVE PERSONAL DATA**

We do not intend to collect data of our website visitors who are younger than 16 years of age, unless the parents or guardian granted permission for this data collection. However, we cannot check whether a website visitor or application user is older than 16 years. For this reason, we encourage parents to be involved in the online activities of their children, in order to prevent the collection of data without parental consent. If you are convinced that we have collected personal data about a minor without this permission, please contact us using the contact details below. We will then make sure that this data will be deleted.

## **3. COOKIE CHOICES**

In accepting this privacy policy, you consent to our placement and continued use of cookies on your device. To learn more about cookies, including how to delete cookies, please visit <http://www.allaboutcookies.org/>.

- Most web browsers are set to accept cookies by default. If you prefer, you can typically remove and reject cookies from our site via your browser settings. If you remove or reject our cookies, it will affect how our Services work.
- You may also render some web beacons unusable by rejecting their associated cookies. If you choose to decline cookies, certain features of the Services that placed the cookie may not function properly or at all as a result.
- If you do not wish us to track emails we send you, some email services allow you to adjust your display to turn off HTML or disable download of images which should effectively disable our email tracking, or you may unsubscribe from our marketing emails.
- You may opt out of tracking of certain information collected by Google Analytics, one of our analytics providers as discussed above, on the websites by clicking [here](#).

## **4. MARKETING CHOICES**

By accepting this privacy policy when submitting your personal data, you consent to us contacting you with newsletter and promotions by email. When you receive newsletters or promotional communications from us, you may “opt-out” by following the unsubscribe instructions provided in e-mails you receive from us or by contacting us directly at the contact information below. You do not have to provide us with any personal data, however if you do not do so we may not be able to provide the Services to you.

## **5. USE OF YOUR DATA**

Personal information you submit to us is used either to respond to requests that you make, or to aid us in serving you better. Drieam uses your personal data in the following ways: to create and maintain your account; to identify you as a user in our system; to notate and assign support tickets that you may initiate; to operate, maintain, and improve our Services; to personalize and improve your experience; to send you administrative e-mail; to respond to your comments or inquiries; to send you surveys, promotional communications about our products and services with your permission; to protect, investigate, and deter against fraudulent, unauthorized, or illegal activity; and to make telephone calls to you, from time to time, as a part of secondary fraud protection or to solicit your feedback with your permission.

We may use data which has been de-identified and aggregated data for additional purposes.

## **6. DATA RETENTION**

We will retain your personal data for the period necessary to fulfill the purposes outlined in this privacy policy and will not store this information for more than one (1) year after the data is no longer necessary for those purposes and as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

## **7. DISCLOSURE OF YOUR PERSONAL INFORMATION**

We will share your personal data with third parties only in the ways that are described as follows or with your express consent.

### THIRD PARTY SERVICE PROVIDERS

We may disclose your information to third parties if we determine that such disclosure is legally required or reasonably necessary for the execution of the agreement. Relevant examples of such disclosure include submitting your personal data to a third party that is responsible for executing an agreement or using this data to accurately respond to questions or complaints. For example, we may share data with service providers who host our websites or provide email services on our behalf.

Some of our sub-processors can store data outside the European Economic Area. These sub-processors are part of the Privacy Shield Framework. This means that they meet security requirements that are considered adequate by the European Commission. You hereby authorize us to store personal data outside the European Economic Area.

### HUBSPOT

We use HubSpot. HubSpot is a platform, which make it possible to combine marketing, sales and customer service. Therefor HubSpot receives information about you when you request a demo/free trial or download a whitepaper.

The purpose of the processing of personal data is client accounting and, in some cases, we might use personal data for direct marketing or commercial reasons.

The lawful basis of the processing can either be consent, performance of a contract or our legitimate interest, depending on how we use HubSpot. If we make use of the CRM function the processing is

necessary for the performance of a contract. We need the CRM function of HubSpot to get in touch with you. The lawful basis of the marketing purpose is our legitimate interest. We believe the way HubSpot works is making a minimum impact on your privacy and you the possibility to opt-out. On the other hand, we do need HubSpot to generate new leads. In the case we did not use HubSpot, it would be very hard for us to find new clients. Even though we believe we have a legitimate interest to use the marketing function of HubSpot, in some cases we can ask for your consent. HubSpot is based in the United States of America, but is certified under the Privacy Shield Agreement. For more information about HubSpot, we refer you to their [privacy policy](#).

#### EDUCATIONAL INSTITUTION OR OTHER COURSE PROVIDER

We will share your information with the educational institution or organization which is linked to your use of the Services. This would apply if your educational institution uses our Services for their learning management platform and has given you access to the Services.

#### OTHER DISCLOSURES

Drieam may disclose information about you if it believes such disclosure is necessary to (a) comply with laws or to respond to lawful requests and legal process; or (b) protect or defend the rights, safety, or property of Drieam, users of the Services, or any person including to enforce our agreements, policies, and terms of use, or (c) in an emergency to protect the personal safety of any person.

We may also share de-identified and aggregated data with others for their own uses.

### **8. YOUR RIGHTS REGARDING YOUR PERSONAL INFORMATION**

We would like to inform you of your rights concerning the collection and use of your data. Under European law, individuals have the right to:

- ACCESS THEIR PERSONAL DATA  
Individuals have the right to access the personal data we collect and may obtain a copy of this data by contacting us.
- RECTIFICATION  
Individuals have the right to have personal data rectified if it is incomplete and/or erroneous and can make a request for rectification. You can change (some of) your personal data in your account by editing your profile or by contacting us. We will respond to your request within 4 weeks as is permitted by law.
- ERASURE  
In some circumstances, you have the “right to be forgotten”. Those circumstances include:
  - The personal data are no longer necessary in relation to the purposes for which they were collected and/or processed;
  - You withdraw the (explicit) consent you previously provided to process the information, and there is no other legal ground for the processing;
  - You object to the processing of your personal data and have legitimate, compelling reasons which supersede our interests and reasons for processing your data;
  - You object to your personal data being processed for direct marketing purposes;
  - You are below the age of 16 and our website has collected your personal data;
  - We are obligated to delete your personal data after the time limits set by laws or other regulations;
  - There are (no longer) any legal grounds for processing your data.You can choose to delete your account (and so cancel the Service) through the Services. You may also request changes (to see, to correct, to update) or deletions by e-mailing us.
- RESTRICTION OF PROCESSING

Individuals reserve the right to minimize the processing of your personal data. If we are informed that we are using incorrect personal data, we will not use this data until it has been rectified. We will furthermore restrict processing data if the processing is either unlawful or no longer necessary, or you oppose the erasure of your personal data and instead request the restriction of their use.

- **DATA PORTABILITY**

You reserve the right to data portability, i.e. to receive the personal data concerning you that you have provided to us.

- **OBJECT**

If you would like to exercise any of these rights, please get in touch with us via [securityofficer@drieam.com](mailto:securityofficer@drieam.com).

## **9. SECURITY OF YOUR PERSONAL INFORMATION**

Drieam takes reasonable steps to help protect your personal data in an effort to prevent unauthorized access, use, or disclosure. Despite these measures, you should know that Drieam cannot fully eliminate security risks associated with personal data. No method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee its absolute security. Any content you post while using the Services is at your own risk. If you have any questions about security on our websites or apps, you can contact us at the contact information set forth below.

## **10. CONTROLLER**

“Drieam B.V.” is the data controller in relation to processing of your data pursuant to this policy. References to 'Drieam' in this policy are to Drieam B.V. Drieam welcomes your comments or questions regarding this privacy policy. Please e-mail us at [securityofficer@drieam.com](mailto:securityofficer@drieam.com) or contact us at the following address or phone number:

Drieam B.V.  
Don Boscostraat 4  
5611KW Eindhoven  
the Netherlands  
+31 40 30 46 346

## **11. DATA PROTECTION OFFICER (DPO)**

Drieam has appointed Aukje Looijmans (legal counsellor at Looijmans Juristen) as our DPO. As independent external supervisor and advisor she is charged with the supervision of Drieam's security compliance with the applicable legislation (including the GDPR) in the area of personal data. Drieam's DPO contact details:

Looijmans Juristen  
Aukje Looijmans  
[aukje@looiijmansjuristen.nl](mailto:aukje@looiijmansjuristen.nl)  
+31 614445909

## **12. COMPLAINTS**

If you are unhappy with the way we collect, store, or process your personal data, please contact us via [securityofficer@drieam.com](mailto:securityofficer@drieam.com). Our Information Security Officer and Management, who are counselled by an external Data Protection Officer, manage this mailbox jointly. A register of questions and complaints will be kept.

If the situation is not resolved to your satisfaction by contacting the above-mentioned entities, you may file a complaint with the Dutch Data Protection Authority (DPA).

### **13. CHANGES TO THIS PRIVACY POLICY.**

Drieam may change this privacy policy, if any change is made, we will change the “last updated” date at the beginning of the document. If such changes are material, a notice of the changes will be posted along with the revised privacy policy, prior to the change becoming effective. We encourage you to visit this page from time to time in order to be aware of the latest privacy practices.