

## Privacy policy

This is the privacy policy (“policy”) for the website heevacourses.com which is run and provided by HeevaCourses Ltd.

231A Nether Street, London, N3 1NT.

We will only use the personal data gathered over this website as set out in this policy. Below you will find information on how we use your personal data, for which purposes your personal data is used, with whom it is shared and what control and information rights you may have.

### I. Summary of our processing activities

The following summary provides you with a quick overview of the processing activities that are undertaken on our website. You will find more detailed information under the indicated sections below.

- When you visit our website for informational reasons without setting up an account, only limited personal data will be processed to provide you with the website itself (see section III).
- In case you register for one of our services (e.g. discussion forum, blog, student panel, or web shop) or subscribe to our newsletter, further personal data will be processed in the scope of such services (see sections IV, V and VI).
- Furthermore, your personal data will be used to provide you with interesting advertising for our services and products (see section VIII) and for statistical analysis that helps us to improve our website (see section IX). Additionally, we improve your website experience with third party content (see section X).
- We have implemented appropriate safeguards to secure your personal data (see section XIII) and retain your personal data only as long as necessary (see section XIV).
- Under the legislation applicable to you, you may be entitled to exercise certain rights with regard to the processing of your personal data (see section XV).

### II. Definitions

- Personal data: means any information relating to a natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, or an online identifier.
- Processing: means any operation which is performed on personal data, such as collection, recording, organisation, structuring, storage, adaptation or any kind of disclosure or other use.

### III. Informational use of the website

When you visit our website for informational reasons, i.e. without registering for any of our provided services listed under IV and without providing us with personal data in any other form, we may automatically collect additional information about you which will contain personal data only in limited cases and which is automatically recognised by our server, such as:

- the website from which you have been directed to our offer
- the date and time of your requests
- your device type, screen resolution and browser version
- information on your operating system, including language settings
- information on the offers you have visited on our website

We use such information only to assist us in providing an effective service (e.g. to adapt our website to the needs of your device or to allow you to log in to our website), and to collect broad demographic information for anonymised, aggregated use. The personal data automatically collected

is necessary for us to provide the website, Article 6 sec. 1 sent. 1 lit. b GDPR, and for our legitimate interest to guarantee the website's stability and security, Article 6 sec. 1 sent. 1 lit. f GDPR.

Personal data that is collected automatically is anonymized immediately and properly erased afterwards.

## **I. Registration for our services**

Our website offers a access to learning content including a broad variety with its interaction. In order to use the aforementioned services you have to set up an account.

With regard to the registration of an account and its subsequent use, we process:

- Information (such as your name and email address) that is provided by registration Whenever you complete transactions using our website, e.g. purchasing a publication, further data processing processes may take place, of which you will of course be separately informed.

We will process the personal data you provide to:

- Identify you at sign-in
- Provide you with the services and information offered through the website or which you request
- Administer your account
- Communicate with you

For this, the legal basis is Article 6 sec. 1 sent. 1 lit. b GDPR.

The use of your personal data for behavioural advertising and profiling is done for the legitimate interest to improve your experience while using the website, Article 6 sec. 1 sent. 1 lit. f GDPR.]

You can object to the use of your personal data for direct marketing at any time. We will then refrain from any processing to the extent it is related to such purposes. You can inform us about your objection by contacting us at [info@heevacourses.com](mailto:info@heevacourses.com)

For our services we offer a notification service. If you chose this service while setting up your user account or posting your comment, you will receive a notification email when another user replies to the same topic or article. This service is provided by means of a double-opt-in. Thus, you will receive an email containing a link by which you can confirm that you are the owner of the email address and wish to be notified via our email service.

You can end this service by opting out via the link provided in each notification email. This notification service is based on your consent, Article 6 sec. 1 sent. 1 lit. a GDPR.]

Your personal data is, in the absence of exceptions within the specific services mentioned below, retained for as long as your user account is used. After deletion of your account, your personal data will be erased immediately. Statutory storage obligations or the need for legal actions that may arise from misconduct within the services or payment problems can lead to a longer retention of your personal data. In this case, we will inform you accordingly.

## **II. Information about the specific uses that require registration**

For the use of the following services you have to set up an account as described under IV. Your customer account retains your personal data for future purchases and other activity. You can delete the personal data as well as the account in your account's settings. This processing is based on Article 6 sec. 1 sent. 1 lit. b.]

### **1. Use of our discussion forum**

Our forum can be accessed and read without registration. Anything you post on the discussion forum will be available to a broader public; you can delete your posts at any point in time. In order to provide content to the forum, you will have to register as described in IV.

You can delete your user account by clicking “Delete” within “Account settings” . In case you decide to delete your user account, all your account data, including all communication will be deleted. Information posted by you into our discussion forum will remain visible, but any link to your person will be deleted. The unique username you selected during signup process will become available to other users upon deletion.

We reserve the right to delete comments that are off-topic, spam, abusive, use excessive foul language, include ad hominem attacks or offend against legal regulations.

### **III. Newsletter**

With your email address you can subscribe to our newsletter that provides you with the latest news about our products and services if you consent to receiving such newsletters and may also contain topic-specific advertisements. The legal basis for this processing is Article 6 sec. 1 sent. 1 lit. a GDPR. Your email address will be retained as long as you subscribe to our newsletter.

You can unsubscribe from this service by opting out via the link provided in each newsletter.

### **IV. Automated decision making**

We do not use your personal data for automated decision making which produces legal effects concerning you or similarly significantly affects you.

### **V. Analysis**

For statistical analyses we use web analytics services to collect information about the use of this site.

#### **1. General tracking information**

The tools collect information such as

- Device and browser information (operating system information, Mobile device identifier, mobile operating system, etc.)
- IP address
- Page accessed, URL click stream (the chronological order of our internet sites you visited)
- Geographic location
- Time of visit
- Referring site, application, or service

We use the information we get from the providers only to determine the most useful information you are looking for, and to improve and optimise this website. We do not combine the information collected through the use of the tools with personal data.

Depending on the provider the information generated about your use of the website may be transferred to and processed in third countries, e.g. the United States. For further information about the potential risks of a cross border data transfer please refer to section XII. The tools collect only the IP address assigned to you on the date you visit this site, rather than your name or any other identifying information. The provider will use this information in order to evaluate your use of the website, to compile reports on website activities and to provide other services relating to website and internet use to us.

The legal basis for this processing is Art. 6 sec. 1 sent. 1 lit. f GDPR and represents our legitimate interest to analyse our website’s traffic to improve the user’s experience and to optimise the website in general .

#### **2. Google Analytics / Google Tag Manager**

We use Google Analytics, a web analytics service provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google"). On our behalf Google will use the information generated by a cookie for the purpose of evaluating your use of the website, compiling reports on website activity and providing other services relating to website activity and internet activity in connection with the use of the website.

We have activated the IP-anonymisation within the Google Analytics service, and your IP address will be truncated within the area of member states of the European Union or other parties to the Agreement on the European Economic Area. Only in exceptional cases the whole

IP address will be first transferred to a Google server in the USA and truncated there. The IP-address your browser conveys within the scope of Google Analytics will not be associated with any other data held by Google.

You may refuse the use of cookies by selecting the appropriate settings on your browser;

however please note that if you do this you may not be able to use the full functionality of this website. In addition to that you may prevent the collection of the information generated by the cookie about your use of the website (including you IP address) and the processing of this data by Google if you download and install the browser plug-in available at the following link:

<http://tools.google.com/dlpage/gaoptout>

### **1. Links to third party websites**

This website may contain links to third party websites. We are not responsible for the content and the data collection on respective third party websites; please check the privacy policy of respective websites for information of respective websites' data processing activities.

### **VI. Security**

We have reasonable state of the art security measures in place to protect against the loss, misuse and alteration of personal data under our control. For example, our security and privacy policies are periodically reviewed and enhanced as necessary and only authorised personnel have access to personal data. Whilst we cannot ensure or guarantee that loss, misuse or alteration of information will never occur, we use all reasonable efforts to prevent it.

You should bear in mind that submission of information over the internet is never entirely secure.

We cannot guarantee the security of information you submit via our website whilst it is in transit over the internet and any such submission is at your own risk.

### **VII. Data retention**

We strive to keep our processing activities with respect to your personal data as limited as possible. In the absence of specific retention periods set out in this policy, your personal data will be retained only for as long as we need it to fulfil the purpose for which we have collected it and, if applicable, as long as required by statutory retention requirements.

### **VIII. Your rights**

Under the legislation applicable to you, you may be entitled to exercise some or all of the following rights:

1. require (i) information as to whether your personal data is retained and (ii) access to and/or duplicates of your personal data retained, including the purposes of the processing, the categories of personal data concerned, and the data recipients as well as potential retention periods;
2. request rectification, removal or restriction of your personal data, e.g. because (i) it is incomplete or inaccurate, (ii) it is no longer needed for the purposes for which it was collected, or (iii) the consent on which the processing was based has been withdrawn;
3. refuse to provide and – without impact to data processing activities that have taken place before such withdrawal – withdraw your consent to processing of your personal data at any time;

4. object, on grounds relating to your particular situation, that your personal data shall be subject to a processing. In this case, please provide us with information about your particular situation. After the assessment of the facts presented by you we will either stop processing your personal data or present you our compelling legitimate grounds for an ongoing processing;

5. take legal actions in relation to any potential breach of your rights regarding the processing of your personal data, as well as to lodge complaints before the competent data protection regulators;

6. require (i) to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and (ii) to transmit those data to another controller without hindrance from our side; where technically feasible you shall have the right to have the personal data transmitted directly from us to another controller; and/or

7. not to be subject to any automated decision making, including profiling (automatic decisions based on data processing by automatic means, for the purpose of assessing several personal aspects) which produce legal effects on you or affects you with similar significance.

You may (i) exercise the rights referred to above or (ii) pose any questions or (iii) make any complaints regarding our data processing by contacting us using the contact details set out below.

#### **IX. Contacting us**

Please submit any questions, concerns or comments you have about this privacy policy or any requests concerning your personal data by email to our Group Data Protection Officer.

You can contact our Group Data Protection Officer via [dataprotection@springer.com](mailto:dataprotection@springer.com) .

The information you provide when contacting us ([info@heevacourses.com](mailto:info@heevacourses.com)) will be processed to handle your request and will be erased when your request is completed. Alternatively, we will restrict the processing of the respective information in accordance with statutory retention requirements.

#### **X. Amendments to this policy**

We reserve the right to change this policy from time to time by updating our website respectively.

Please visit the website regularly and check our respective current privacy policy. This policy was last updated on July 15<sup>th</sup> 2021.