

PRIVACY POLICY

1. Introduction

Welcome to HowNow! This Privacy Policy is designed to help you understand how we collect, process and store any personal data we collect as part of the service we provide you as our client and also help you understand how we process your employee data on your behalf. This Privacy Policy applies to our Digital Learning Platform, related domains and mobile applications. We may update this Privacy Policy from time to time in order to reflect changes to our privacy practices or for other operational, legal or regulatory reasons. If we make any material changes, we will let you know ASAP.

With the EU's General Data Protection Regulation (GDPR) coming into effect from the 25th of May 2018, we have carried a robust review of all our data processing activities and updated our Privacy Policy to reflect the changes that we have made to be compliant.

2. Some useful facts about us

Here are a few facts about us that you may find useful:

- HowNow is owned and operated by Wonderush Limited, a limited company registered in England and Wales
- Our company number is 09644569
- We are currently based at Second Home, 68 Hanbury St, Spitafields, London, UK
- Our Data Protection Officer (DPO) is Kuvera Sivalingam – you can contact him on dpo@learnhownow.com

3. Personal information from our clients that we process

"Client" is any business/organisation that subscribes to the HowNow Digital Learning Platform.

3.1 What information do we collect?

We collect the following information from our clients:

- Contact Name(s)
- Contact Email addresses
- Billing Address
- Payment details
- Company name, address, registered company number and address
- Phone number
- IP address

3.2 Why do we collect this information?

3.2.1 We use this information to provide you with our services as per our 'Licencing Agreement' and 'Terms of service'.

3.2.2 We may use this information for internal research and analytics purposes to improve our services and understand the needs of clients.

3.2.3 We may use this information to communicate with you about new product updates or any changes to our service.

3.3 When do we collect this information?

We collect this information when you sign up to our services, when you access our services or provided to us at request.

3.4 When and why do we share your information with third parties?

3.4.1 At HowNow we use a number of third-party software providers to ensure that we provide you with the highest level of service. The third-party software providers act as our 'Data Processors' as they process your data on our behalf. We carry out robust checks of all third-party providers to ensure that they are GDPR compliant.

3.4.2 We may also share your information to prevent, investigate, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our Terms of Service or any other agreement related to our services or otherwise required by law.

3.4.3 We may also share your information to conform to legal requirements, or to respond to lawful court orders, subpoenas, warrants, or other requests by public authorities.

3.4.4 Some or all of your personal data may be stored or transferred outside of the European Economic Area (the EEA) for any reason, including for example, if our email server is located in a country outside the EEA or if any of our service providers are based outside of the EEA. You are deemed to accept and agree to this by using the system and submitting information to us. If we do store or transfer your personal data outside the EEA, we will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the EEA and under the Data Protection Act 1998 as amended.

3.5 Your rights

You have the right to obtain from us a copy of the personal information that we hold for you, and to require us to correct errors in the personal information that we process for you if it is inaccurate or incomplete. You also have the right at any time to require that we delete your personal information. To exercise these rights, or any other rights you may have under applicable laws, please contact us at dpo@learnhownow.com.

4. Personal information from your employees that we process

"Your Employees" is anyone from your business/organisation that subscribes to the courses, which are provided using our platform.

4.1 What information do we collect?

As your "Data Processors", we collect the following personal information from your employees on your behalf:

- Name
- Email address
- Role
- Department
- Learning preferences
- Course enrolment information

4.2 Why do we collect this information?

4.2.1 We collect this information to ensure that you are able to provide your services as per the 'Licencing Agreement' and the 'Terms of service'.

4.2.2 We may use this information for internal research and analytics purposes to improve our services and understand the needs of your clients.

4.3 When do we collect this information?

We collect this personal information when your employee registers to the platform.

4.4 When and why do we share your employee's information with third parties?

4.4.1 Some or all of your employee's personal data may be stored or transferred outside of the European Economic Area (the EEA) for any reason, including for example, if our email server is located in a country outside the EEA or if any of our service providers are based outside of the EEA. You are deemed to accept and agree to this by using the system and submitting information to us. If we do store or transfer your personal data outside the EEA, we will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the EEA and under the Data Protection Act 1998 as amended.

4.4.2 We may also share your employee's information to conform to legal requirements, or to respond to lawful court orders, subpoenas, warrants, or other requests by public authorities.

4.5 Data Retention

How long we retain your Personal Data depends on the type of data and the purpose for which we process the data. We will retain your Personal Information for the period necessary to fulfil the purposes outlined in this Privacy Notice unless a longer retention period is required or permitted by law.

4.6 Your employee's rights

Your employee has the right to obtain from you a copy of the personal information that you hold for them, and to require you to correct errors in the personal information that you process for them if it is inaccurate or incomplete. Your employees also have the right at any time to require that you delete their personal information. As your "Data Processor", we will support you with access to the personal information we process on your behalf.

5. Cookies

5.1.1 A cookie is a small text file containing a unique identification number that is transferred (through your browser) from a website to the hard drive of your computer. The cookie identifies your browser but will not let a website know any personal data about you, such as your name and/or address. These files are then used by websites to identify when users revisit that website.

5.1.2 We use cookies so that we can recognise you when you return and personalise your settings and preferences. Most browsers are initially set up to accept cookies. Cookies placed in your browser's memory are called session cookies and cookies placed on your computer's hard drive are called persistent cookies. Session cookies are deleted when you close your browser, while persistent cookies remain on your hard drive, even

after closing your browser. Session cookies are generally used to improve the user experience when using a website. Persistent cookies are generally used to store user preferences, including the preference to keep a user signed in, between browser sessions. You can change your browser settings either to notify you when you have received a cookie, or to refuse to accept any cookies. Please note that the HowNow system may not operate efficiently if you refuse to accept cookies.

5.2 We also use Google Analytics to monitor how you use our platform. Google Analytics collects information anonymously and generates reports detailing information such as the number of visits, where visitors generally came from, how long they stayed on the site, and which pages they visited. Google Analytics places several persistent cookies on your computer's hard drive. These do not collect any personal data. If you do not agree to this, you can disable persistent cookies in your browser. This will prevent Google Analytics from logging your visits.

6. Security

We take appropriate security measures (including physical, electronic and procedural measures) to help safeguard your personal data from unauthorised access and disclosure. The technology that we use and the security policies which we have implemented are intended to safeguard your information from unauthorised access and improper use. However, no system can be completely secure. Therefore, although we take steps to secure your information, we do not promise that your personal data or other content that you upload to the system will always remain secure.