

# PRIVACY POLICY

Last updated: June 14, 2024

This privacy policy (“Privacy Policy”) defines how Academy of Brain Oy (hereinafter “Service Provider” or “we”) processes personal data in accordance with the applicable data protection laws while providing online coaching services (“Service”) to its customers.

The purpose of this Privacy Policy is to explain why and how the Service Provider collects personal data and for what purposes personal data is used and disclosed. Please read the Privacy Policy carefully in advance before starting to use the Service.

## 1. Data Controller and Contact Information

Academy of Brain Oy  
Business ID: 2938267-1  
Address: Lapinlahdenkatu 16, 00180 Helsinki  
Email: [info@academyofbrain.com](mailto:info@academyofbrain.com)

Contact Person:

Toni Toivanen

Email: [toni.toivanen@academyofbrain.com](mailto:toni.toivanen@academyofbrain.com)

(The contact person is not a Data Protection Officer as defined by data protection laws.)

## 2. Data Collection

Users are typically representatives of the Service Provider’s client companies’ staff, for whom the Service Provider provides the Service based on a separate agreement with the client. The client provides the Service Provider with users’ work email addresses, and the Service Provider sends each user a personal link via email, which the user uses to register for the service.

The Service Provider regularly receives personal data directly from the user when the user registers to use the Service and/or during the use of the Services. The Service Provider may also collect personal data from publicly available sources, such as companies’ own websites.

The Service Provider may collect the following data for the purposes defined in this Privacy Policy:

- First and last name, and date of birth
- Contact information, such as email address, postal address, and phone number
- Language preferences
- Company (information about the user’s employer, such as the employer’s name, contact information, and staff group)

- Information about the customer relationship, such as registration date and billing information
- Customer contacts, messages, and their responses
- Responses to online coaching tasks written in the system's text fields
- The trainings completed by the user and other information about the use of the Service

Technical data, which may be personal data, accumulates from the use of the Service, such as:

- Timestamps and log information related to the use of the Service
- Information about the device used, such as the device's unique identifier, model, and operating system

### 3. Legal Basis and Purpose of Processing

The Service Provider has conducted a balancing test as per the Data Protection Ombudsman's guidelines and defined the purposes for processing personal data as follows:

(1) To provide Services and manage, maintain, and develop the related customer relationship. The primary purpose of processing personal data is to provide the Services and manage and maintain the customer relationship. This processing of personal data is based on the legitimate interest of the Service Provider and the fulfillment of the service agreement. This processing includes personal data collected during registration and use of the Service, as well as communication between the Service Provider and the user.

(2) For customer acquisition and marketing. The Service Provider may send newsletters to users, informing them about new services, functionalities, requesting feedback, or providing other updates. This processing is based on the legitimate interest of the Service Provider and/or consent. The user can opt out of marketing messages at any time as per section 7 of this Privacy Policy. Insofar as the processing is for customer acquisition, it is based on the legitimate interest of the Service Provider.

(3) For service development and security. The Service Provider aims to provide a high-quality and secure Service. Therefore, data may also be used for the planning and development of the Service, market and user analysis to improve the quality of the Service. We may also collect information about visits, visit counts, and movements within the Service using cookies and similar technologies for statistical purposes to compile anonymous statistics that describe how users use the Service and make it more user-friendly. This data processing is based on the legitimate interest of the Service Provider.

## 4. Data Transfer and Disclosure

We may transfer or disclose user personal data to third parties in the following cases:

- (1) As part of the Service, we use the online service platform at <https://brain.studytube.nl>, maintained by our partner Studytube B.V. We may also use external service providers for the implementation of the Service and marketing campaigns. We may transfer data to such authorized service providers who process personal data on our behalf in accordance with applicable data protection laws. These service providers (including the online coaching platform provider Studytube B.V.) may only use personal data as instructed by us and only for the purpose for which the data was collected, and we have ensured appropriate handling of personal data in these situations as well.
- (2) Academy of Brain may report work-related training completions (such as which trainings a user has completed) if the employer has provided the training service to the user. Work-related trainings do not include wellness and health-related trainings. We may transfer generic reports containing average data about the number of training users (such as how many users of a particular client company have completed training, what kinds of trainings have been done) to our client, maintaining user anonymity. Additionally, we may transfer information to the client about users who have not registered the personal identifier sent to their email address to ensure the implementation of the Service and prevent technical issues that may hinder implementation.
- (3) As required by law, such as to respond to a subpoena, respond to requests from competent authorities, or in connection with legal proceedings.
- (4) If the Service Provider is involved in a corporate or business transaction.

## 5. Transfer of Data Outside the EU/EEA

Our service uses AWS's European data centers in Dublin and Frankfurt.

## 6. Data Retention

The personal data of each user will be deleted two years after the service usage rights expire. The retention of potential customers' data for sales and marketing purposes is reviewed regularly.

## 7. Rights of the Data Subject

An individual user (the data subject under data protection laws) has the following rights under data protection laws:

- The user has the right to request access to personal data concerning themselves from the Service Provider and the right to request correction or deletion of such data within the limits and in accordance with data protection laws. The user can view their data by logging into the Service with their username and password.
- The user has the right to request restriction of processing, for example, when the

user disputes the accuracy of the data or the processing is unlawful.

- The user has the right to object to the processing of personal data within the limits and in accordance with data protection laws.
- The user has the right to data portability, i.e., to receive personal data concerning themselves in a structured, commonly used format and to transfer it to another data controller within the limits and in accordance with data protection laws.
- The user has the right to file a complaint with the data protection authority if they believe their statutory rights have been violated. In Finland, the supervisory authority is the Data Protection Ombudsman.

Requests mentioned above can be sent to the Service Provider at [info@academyofbrain.com](mailto:info@academyofbrain.com).

Providing the personal data requested by the Service Provider may be a prerequisite for the implementation and use of the Service. If the user does not provide the essential data for the use of the Service or objects to its processing, this may affect the provision of the Service.

## 8. Data Protection

The Service Provider has implemented necessary technical and organizational measures to protect personal data from unauthorized access and accidental or unlawful destruction, alteration, disclosure, transfer, or other unlawful processing. We restrict access to data only to employees and contractors who need to process the data as part of their work, for example, to respond to inquiries or develop the Service.

## 9. Changes to the Privacy Policy

The Service Provider reserves the right to change and update this Privacy Policy. The Service Provider will notify users of significant changes to this Privacy Policy through a newsletter or in another appropriate manner in accordance with the Service Provider's usual practices.