PRIVACY POLICY

Last updated: November 16, 2026

This Privacy Policy explains how Academy of Brain Oy (hereinafter “Academy of Brain”, “we” or “us”) processes personal data in connection with its business operations, services, customer relationships, and marketing activities, in accordance with applicable data protection laws.

It describes what personal data we collect, why and how we process it, with whom it may be shared, and what rights individuals have in relation to their personal data.

1. Data Controller and Contact Information

Academy of Brain Oy

Business ID: 2938267-1

Address: Lapinlahdenkatu 16, 00180 Helsinki, Finland

Email: info@academyofbrain.com

Contact Person:

Toni Toivanen

Email: toni.toivanen@academyofbrain.com

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

2. Data Collection

Academy of Brain provides research-based learning content and related services to business and organizational customers. Our customers typically distribute and manage the learning content through their own learning management systems, intranets, or other digital platforms.

Customer and business contact information

We collect and process personal data relating to our customers' representatives, business contacts, and prospective customers in connection with sales, marketing, customer relationship management, and the provision of our services.

Such information may include:

- First and last name
- Contact details, such as work email address, phone number, and business address
- Job title, employer, and other professional information
- Communication between Academy of Brain and the contact person, including inquiries, messages, and responses
- Information about the customer relationship, such as agreements, service arrangements, and billing information

Where personal data are not collected directly from the individual, we may obtain them from the company they represent, publicly available sources, or other business contacts in connection with our customer and business relationships.

Information relating to end users

In most cases, customers distribute Academy of Brain's learning content through their own learning management systems, intranets, or other digital platforms. End users access and complete the learning content within the customer's systems, and Academy of Brain does not generally collect or have access to their personal data or individual learning activity data.

In certain cases, Academy of Brain may provide access to learning content through the Reach 360 platform. In these cases, we may collect and process the following personal data relating to end users:

- Email address
- First and last name
- Organizational information used to assign users to relevant groups or teams, such as their department or organizational unit
- Team or role information, where applicable, such as whether the user belongs to a group of specialists or managers

This information is used to provide access to the learning content, organize users into relevant groups, and support the delivery and administration of the learning service.

If customers provide Academy of Brain with other end-user personal data, for example in connection with agreed reporting or service-related activities, we process such data only for the relevant purpose and in accordance with applicable contractual arrangements and data protection requirements.

Technical and website data

When individuals visit our website, we may collect technical information and information about website usage through cookies and similar technologies. This information may include IP addresses, technical identifiers, browser type and version, device and operating system information, pages visited, browsing activity, timestamps, and interactions with our website.

We use essential cookies to ensure the proper functioning of our website and to remember users' cookie preferences. Non-essential cookies, such as analytics cookies, are used only with the user's consent.

Further information about the cookies we use, their purposes, providers, and storage periods is available in our Cookie Policy. Our cookie practices are implemented in accordance with applicable legal requirements. Users can manage or withdraw their cookie consent at any time through the cookie settings on our website.

3. Legal Basis and Purpose of Processing

Academy of Brain processes personal data for specific and legitimate purposes in accordance with applicable data protection laws. Depending on the type of data and the purpose of processing, the legal basis may be the performance of a contract, our legitimate interests, or the individual's consent.

The purposes of processing personal data are as follows:

(1) To provide services and manage customer relationships

We process personal data to provide our services, manage customer relationships, communicate with customers and business contacts, administer agreements, and handle related business operations.

This includes processing contact information, customer relationship information, and other relevant business communications. Where necessary, we also process end-user information to provide access to learning content through the Reach 360 platform and to organize users into relevant groups.

The legal basis for this processing depends on the relationship with the individual and the nature of the processing. It may include the performance of a contract, our legitimate interests in managing customer and business relationships, or compliance with legal obligations. Where Academy of Brain processes end-user personal data on behalf of a customer, such processing is carried out in accordance with the customer's documented instructions and the applicable data processing agreement.

(2) For customer acquisition and marketing

We process personal data to identify potential customers, maintain business contacts, communicate about our services, and carry out marketing activities. This may include sending newsletters, sharing information about our services and content, inviting recipients to events, requesting feedback, and communicating other relevant updates.

We carry out direct marketing exclusively to businesses (B2B), not to consumers (B2C). We may collect business contact details directly from individuals, from publicly available sources such as LinkedIn profiles and company websites, and from other business-related sources. We select contacts whose professional roles and responsibilities are relevant to our services and content.

The legal basis for processing depends on the nature of the marketing activity and applicable legal requirements. We rely on our legitimate interests in business development, customer acquisition, and maintaining relevant business relationships when processing business contact details for these purposes. Where consent is required, we send marketing communications only to individuals who have given their consent.

Marketing to existing customers: Where an individual has provided their contact details in connection with the purchase of our services, we may use those details to market our own similar products or services, where permitted by applicable law. Individuals are given the opportunity to object to such marketing when their contact details are collected and in every subsequent marketing message.

Recipients may unsubscribe from marketing communications or object to direct marketing at any time, free of charge, using the unsubscribe mechanism provided in the communication or by contacting us. Following an objection, we will stop processing the individual's personal data for direct marketing purposes.

(3) For service development, business operations, and security

We process personal data to maintain, develop, and improve our services, business operations, and customer experience. This may include analyzing customer feedback,

evaluating service performance, conducting business and market analysis, and monitoring the technical functionality and security of our services.

We may also use technical data, cookies, and similar technologies to understand how visitors interact with our website and to compile statistics about website usage. The use of non-essential cookies and similar technologies, including analytics cookies, is based on the individual's consent. Essential cookies are used where necessary for the proper functioning of the website or the provision of a service explicitly requested by the user.

Users may withdraw their consent at any time through the cookie settings on our website. Withdrawing consent does not affect the lawfulness of processing carried out before the withdrawal.

The legal basis for processing personal data for service development, business operations, and security is our legitimate interest in developing our business, maintaining service quality, and ensuring the security and reliability of our services. The use of non-essential cookies and similar technologies is based on consent.

(4) To support internal business operations using artificial intelligence tools

We may use artificial intelligence (AI) tools to support internal business activities, such as customer relationship management, sales and marketing, marketing content creation, information organization, email management, and administrative tasks.

Where personal data are processed through AI tools, such processing takes place only for purposes compatible with the original purposes of collection and subject to appropriate safeguards and access controls.

The use of AI tools does not change the legal basis for the underlying processing of personal data. Where personal data are processed through such tools, Academy of Brain ensures that the processing has an appropriate legal basis, is compatible with the original purpose of collection, and is subject to appropriate technical and organizational safeguards.

4. Data Transfer and Disclosure

Academy of Brain may disclose or transfer personal data to third parties in the following circumstances:

(1) Service providers and business tools

We use external service providers to support our business operations, customer relationships, sales and marketing activities, internal communications, and the delivery of our services. These providers may process personal data on our behalf in accordance with applicable data protection laws and the relevant contractual arrangements.

Depending on the purpose of processing, our service providers may include:

- **Reach 360:** We may use Reach 360 as a platform for distributing learning content, facilitating testing of our learning content and managing end-user access in certain customer arrangements. In these cases, personal data such as users' names, email addresses, and organizational information may be processed through the platform.
- **HubSpot:** We use HubSpot for customer relationship management, sales, marketing, and related business activities. This may involve processing contact information, customer relationship data, and business communications.
- **Noux:** We use Noux in connection with sales activities, customer projects, and the management of our partner network. This may involve processing business contact information and other relevant information relating to customer and partner relationships.
- **Slack:** We use Slack for sales-related activities, customer work, and internal communication and collaboration. Personal data, such as names and email addresses, may be processed in direct messages (DMs) relating to sales and customer work. Our internal practices restrict the handling of personal data in these contexts to direct messages rather than public or shared channels. Slack messages containing such information are automatically deleted after one year in accordance with our retention settings.
- **Anthropic (Claude):** We use Claude to support internal business operations and other work-related tasks, including sales, marketing, information organization, and email-related activities. Depending on the tasks performed and the permissions granted, personal data and other information from connected business applications may be processed by Anthropic. Claude is connected to Microsoft 365 through the Microsoft 365 connector. This enables users to access and work with information in their own Microsoft 365 mailbox, including reading their own emails and preparing email responses. The connector's access is restricted to each individual user's own mailbox. It does not provide access to other users' mailboxes through that connection. The emails accessed in this context are ordinary business communications and are not intended to include special categories of personal data. Anthropic's model training setting is

disabled for our use. Processing and storage of information by Anthropic are subject to the applicable commercial agreement, data processing agreement, and configured retention settings.

- **Microsoft 365 (Office 365):** We use Microsoft 365 for business communications, email, document storage, and collaboration. Personal data may be included in emails, documents, calendar information, and contact details processed through the service. Where connected to Claude through the Microsoft 365 connector, information from an individual user's own mailbox may be accessed and processed in accordance with the permissions and safeguards described above.

Our service providers may use their own subcontractors (sub-processors) to support the provision of their services. These sub-processors may process personal data on behalf of the relevant service provider. Our service providers are responsible for ensuring that their sub-processors comply with applicable data protection requirements and are bound by appropriate data protection obligations. Where required, the use of sub-processors is governed by the relevant data processing agreements and applicable data protection laws.

We select service providers that are required to protect personal data in accordance with applicable data protection laws. Where a provider processes personal data on our behalf, the processing is governed by an appropriate data processing agreement and the provider must follow our documented instructions.

(2) Disclosure to customers

In certain cases, we may share information with our customers to support the delivery, administration, and evaluation of our services. This may include information necessary to organize access to learning content or administer user groups in Reach 360.

Where applicable, we may also provide aggregated or anonymized reports about the use of our learning content. We aim to ensure that such reports do not identify individual users.

(3) Legal obligations

We may disclose personal data when required by law or when necessary to respond to requests from competent authorities, comply with legal obligations, or establish, exercise, or defend legal claims.

(4) Corporate or business transactions

Personal data may be transferred in connection with a merger, acquisition, restructuring, sale of business operations, or other corporate transaction involving Academy of Brain. In such cases, we ensure that personal data continues to be processed in accordance with applicable data protection laws.

5. Transfer of Data Outside the EU/EEA

Academy of Brain uses service providers whose infrastructure and operations may involve the processing, storage, or access of personal data both within and outside the European Union (EU) and the European Economic Area (EEA).

Some of our service providers process or store personal data outside the European Union or the European Economic Area (EU/EEA), including in the United States.

The storage and processing locations may vary depending on the service provider:

- **HubSpot:** Our HubSpot data is stored in the United States (East).
- **Microsoft 365 (Office 365):** Our Microsoft 365 data storage location is within the European Union / European Free Trade Association (EU/EFTA).
- **Anthropic (Claude):** Information processed through Claude, including information accessed through the Microsoft 365 connector, is subject to Anthropic's applicable commercial agreement, data processing agreement, and configured retention settings. The fact that the connected Microsoft 365 mailbox is stored in the EU/EFTA does not necessarily mean that information accessed through Claude is processed or stored exclusively within that region.

Where personal data are transferred to the United States, the relevant service providers may rely on the EU–US Data Privacy Framework, where their certification covers the service and contractual relationship in question. Transfers may also be governed by the European Commission's Standard Contractual Clauses (SCCs).

Where required, appropriate supplementary safeguards are implemented to ensure that personal data receive a level of protection essentially equivalent to that guaranteed within the EU/EEA.

Some service providers may store their primary databases within the EU/EEA while processing or allowing access to personal data from other countries through global application components, support functions or analytics tools. We assess such transfers and access arrangements and apply appropriate safeguards in accordance with applicable data.

Where personal data are transferred outside the EU/EEA to a country that does not benefit from an adequacy decision by the European Commission, Academy of Brain ensures that an appropriate transfer mechanism is in place in accordance with applicable data protection laws. Such mechanisms may include the European Commission's Standard Contractual Clauses (SCCs), or other legally recognized transfer mechanisms, together with supplementary measures where necessary.

Further information about the locations of processing and the safeguards applied to international data transfers is available upon request.

6. Data Retention

Academy of Brain retains personal data only for as long as necessary to fulfil the purposes for which the data were collected, or as required by applicable laws and regulations.

The retention period depends on the type of data, the purpose of processing, the nature of the customer relationship, and any applicable legal obligations.

Personal data relating to customer and business contacts are retained for as long as necessary to manage business relationships and fulfil the purposes described in this Privacy Policy. When a customer relationship ends, relevant contact details may be transferred to our sales records for potential future business purposes. These records are reviewed regularly, taking into account changes in individuals' professional roles and responsibilities. Contact details are deleted or anonymized when the individual's role is no longer relevant to our services or there is otherwise no longer a valid business purpose for retaining them.

Personal data relating to potential customers are also reviewed regularly. We assess whether an individual's professional role and responsibilities remain relevant to our services and content, including whether they are involved in decisions concerning relevant services or in carrying out related work. Contact details are deleted or anonymised when this professional relevance no longer exists or the data are no longer needed for sales and marketing purposes.

We may retain personal data for longer where necessary to comply with legal obligations or to establish, exercise, or defend legal claims.

Retention in business systems

We manage the retention of personal data in our business systems according to the purpose of processing and the applicable retention requirements.

- **HubSpot:** Business contact records are reviewed regularly. Contact details are deleted or anonymised when they are no longer relevant to our business development and marketing activities, for example due to changes in an individual's professional role.
- **Noux:** Rooms created for customer projects are deleted one year after the relevant customer case has ended. If the relationship develops into a customer relationship, the room is converted into a customer room.
- **Slack:** Personal data relating to sales and customer work are handled in direct messages (DMs) in accordance with our internal practices. Slack messages containing such information are automatically deleted one year after they are created, in accordance with our retention settings.
- **Microsoft 365 (Office 365):** Business emails and other information are retained in accordance with our Microsoft 365 retention settings and applicable business and legal requirements. Our Microsoft 365 data storage location is within the EU/EFTA.
- **Claude:** Information processed through Claude is subject to Anthropic's applicable commercial agreement, data processing agreement, and configured retention settings. Model training using our data is disabled.

End-user data processed through Reach 360

Where Academy of Brain processes end-user personal data through Reach 360 on behalf of a customer, such data is retained and deleted in accordance with the applicable agreement and the customer's documented instructions.

Upon termination of the relevant service, Academy of Brain will arrange for the return or deletion of such personal data in accordance with its agreement with the customer and applicable data protection requirements. Articulate, as the provider of Reach 360, will return or securely delete Customer Personal Data processed on our behalf upon our written request or, in the absence of such a request, within 180 days after termination or expiration of the applicable services, subject to any legal retention requirements. Personal data retained in routine backups and security logs will be protected and deleted in accordance with Articulate's documented retention schedule.

Where Academy of Brain acts as a processor on behalf of a customer, the customer is responsible for determining the applicable retention and deletion requirements, and Academy of Brain assists in carrying out those instructions.

7. Rights of the Data Subject

Individuals whose personal data are processed by Academy of Brain have the rights provided under applicable data protection laws. Depending on the circumstances and the legal basis for processing, these rights may include:

- **Right of access:** The right to obtain confirmation as to whether personal data concerning them are being processed and to access such data.
- **Right to rectification:** The right to request correction of inaccurate or incomplete personal data.
- **Right to erasure:** The right to request deletion of personal data in certain circumstances.
- **Right to restriction of processing:** The right to request restriction of processing in certain circumstances, for example while the accuracy of personal data is being verified.
- **Right to object:** The right to object to the processing of personal data in certain circumstances, including processing based on legitimate interests and processing for direct marketing purposes.
- **Right to data portability:** The right to receive personal data they have provided to Academy of Brain in a structured, commonly used, machine-readable format and to transmit those data to another controller, where the legal requirements for this right are met.
- **Right to withdraw consent:** Where processing is based on consent, the individual has the right to withdraw their consent at any time. Withdrawal does not affect the lawfulness of processing carried out before the withdrawal.
- **Right to lodge a complaint:** The right to lodge a complaint with the competent data protection supervisory authority if they believe their personal data have been processed in violation of applicable data protection laws. In Finland, the supervisory authority is the Office of the Data Protection Ombudsman.

Requests concerning personal data processed by Academy of Brain as a data controller can be sent to **info@academyofbrain.com**. We may request additional information to verify the identity of an individual submitting a request, where necessary to protect personal data.

Where Academy of Brain processes personal data on behalf of a customer, for example through Reach 360, individuals may need to exercise their rights by contacting the relevant customer organization. Academy of Brain will assist the customer with such requests in accordance with the applicable data processing agreement.

The provision of certain personal data may be necessary for Academy of Brain to enter into or fulfil a customer relationship or provide an agreed service. If the required data are not provided, this may affect the provision of the service.

8. Data Protection

Academy of Brain has implemented appropriate technical and organizational measures to protect personal data against unauthorized or unlawful access, disclosure, alteration, loss, destruction, or other unlawful processing.

Access to personal data is restricted to employees, contractors, and authorized service providers who need access to perform their assigned tasks or provide services to Academy of Brain. Access rights are granted according to the principle of least privilege and are reviewed as necessary.

Academy of Brain requires its service providers to implement appropriate security measures. Where they process personal data on our behalf, their obligations are governed by applicable data processing agreements and other contractual arrangements.

9. Changes to the Privacy Policy

Academy of Brain reserves the right to update this Privacy Policy from time to time to reflect changes in its data processing practices, services, or applicable legislation.

The latest version of this Privacy Policy will be published on Academy of Brain's website, together with the date of the latest update. Where changes are significant, Academy of Brain will provide additional notice through appropriate communication channels, where required by applicable data protection laws.