# **Privacy policy**

At TEDU Institute ("Institute") through our website at <u>www.milanhosta.com</u>, <u>www.dihalnica.si</u>, <u>www.matrixofchange.com</u> (the "Site") and mobile application, ("App"), there are different ways you can use our products, features, services, websites, and applications (together, or individually, the "Service") to explore your resilience strengths in detail.

## **PRIVACY POLICY ACCEPTANCE**

This Privacy Policy ("Policy") describes the data that we gather on or through the Service, how we use and disclose such data, and the steps we take to protect such data. By visiting the Site, or by accessing or using the Service, you consent to the data collection, disclosure and use practices described in the Policy. Please also review our <u>Terms and Conditions</u>, which governs your use of the Service.

## **DATA COLLECTION**

While providing our Service, Institute may collect or receive your personal data in a few different ways.

Resilience collects your personal data such as:

- Name
- Job title
- Phone number
- Business e-mail address
- Business address
- Organization name
- Resident country
- Year of birth
- Gender
- Wellbeing awareness assessment results
- Other data collected that could directly or indirectly identify you

Data is collected in the following ways:

• Register a user account (ex: name, e-mail address, year of birth, gender)

- Health and life-style questionnaires and other resilience assessment (ex: wellbeing awareness assessment results)
- Purchase our service (ex: name, company name, address, phone number, e-mail address);
- Request assistance from customer support team (ex: name, phone number, e-mail address); or
- Complete contact forms (ex: name, email address, phone number, organization, country)

However, we also collect additional information when delivering our Service to you to ensure optimal performance.

**Account related information** is collected in association with your use of our Service, such as account number identifying a company, purchases, when products renew or expire, information requests, and customer service requests and notes or details.

**Cookies and similar technologies** on our websites and our Service allow us to track your browsing behavior, links clicked, items purchased, your device type, and to collect various data, including analytics, about how you use and interact with our Service. This allows us to provide you with more relevant product offerings, a better experience on our sites and applications, and to collect, analyze and improve the performance of our Service. We may also collect your location internet protocol (IP) address so that we can personalize our Service. For additional information, and to learn how to manage the technologies we utilize, please visit our <u>Cookie Policy</u>.

**Data about usage of service** is automatically collected when you use and interact with our Service, including metadata, log files, cookie/device IDs and location information. This information includes specific data about your interactions with the features, content and links (including those of third-parties, such as social media plugins) contained within the Service, IP address, browser type and settings, the date and time the Service was used, information about browser configuration and plugins, language preferences and cookie data, information about devices accessing the Service, including type of device, what operating system is used, device settings, application IDs, unique device identifiers and error data, and some of this data collected might be capable of and be used to approximate your location.

**Non-identifying data** may be collected, such as postal codes, country, demographic data, information regarding your use of the Service, and general project related data ("Non-Identifying Information").

# DATA USE

Institute believes in minimizing the data we collect and limiting its use and purpose to only that (1) for which we have been given permission, (2) as necessary to deliver the Service purchased or interact with, or (3) as we might be required or permitted for legal compliance or other lawful purposes. These uses include:

- Improve and optimize the operation and performance of our Service
- To contact you with administrative communications, verify information provided, and other information that may be of interest to you.
- Understand and analyze how you use our Service and what products and services are most relevant to you.
- Send promotional emails about new products, special offers or other information that may be interesting to you
- To enforce and comply with the law, including to conduct an investigation, to protect the property and rights of Resilience, to protect the safety of the public or any person, or to prevent or stop activity we may consider to be, or to pose a risk of being, illegal, fraudulent, unethical or legally actionable activity.

# **DATA SHARING**

Institute discloses personal data only to Third Parties who reasonably need to know such data. Such recipients must agree to abide by confidentiality obligations.

Institute's use of Third Parties will maintain administrative, physical, and technical safeguards for protection of the security, confidentiality and integrity of client data. Those safeguards will include, but will not be limited to, measures for preventing access, use, modification or disclosure of client data by Third-Party suppliers personnel.

We may also share the information we have collected about you, including personal data, as disclosed at the time you provide your data, with your consent, as otherwise described in this Policy, or in the following circumstances:

- To contractors, business partners and service providers we use to support our Service;
- In the event Institutue sells or transfers all or a portion of its business or assets (including in the event of a merger, acquisition, joint venture, reorganization, dissolution or liquidation), in which case personal data held by us about our Customers will be among the assets transferred to the buyer or acquirer;
- In response to lawful requests from public authorities, including to meet national security, public interest or law enforcement requirements.

# **DATA TRANSFER**

We may transfer, process and store personal data we collect through the Service in centralized databases and with service providers located in Slovenia or EU. Slovenian law provides a standard of data protection that is adequate for the purposes of EU law.

### **SECURE, STORE, RETAIN DATA**

We follow generally accepted standards to store and protect the personal data we collect, both during transmission and once received and stored, including utilization of encryption where appropriate.

We retain personal data only for as long as necessary to provide the Service you have requested and thereafter for a variety of legitimate legal or business purposes. These might include retention periods:

- Mandated by law, contract or similar obligations applicable to our business operations;
- For preserving, resolving, defending or enforcing our legal/contractual rights; or
- Maintaining adequate and accurate business and financial records.

# ACCESS, CORRECT, OR DELETE YOUR DATA

To request access to, correction, or deletion, of personal data, please sign into your account that you've created through a secure login.

If you are unable for any reason to access your account settings, you may also contact us by one of the methods described in the "Contact Us" section below.

Where you have provided your consent, you also have the right to withdraw your consent to our processing of your data and your use of our Service. You can withdraw your consent through your account settings or by making a request by contacting us.

You may decline to share certain personal data with us, in which case we may not be able to provide to you some of the features and functionality of the Service.

If you make a request to delete your personal data and that data is necessary for the use of the Service, the request will be honored only to the extent it is no longer necessary for the Service or required for our legitimate business purposes or legal or contractual record keeping requirements.

Institute will respond to all requests, inquiries, or concerns within thirty (30) days.

#### **AGE RESTRICTION**

Our Service is made available for those over the age of 18. Our Service is not targeted to, intended to be used by or designed for individuals to access under the age of 18. If you know of or have reason to believe anyone under the age of 18 has provided us with any personal data, please contact us.

#### **CHANGES TO OUR PRIVACY POLICY**

We reserve the right to modify this Policy at any time. If we decide to change our Policy, we will post those changes to this Policy and any other places we deem appropriate, so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. If we make changes to this Policy, we will notify you by email, or by means of a notice on our home page, at least thirty (30) days prior to the implementation of the changes.

### COMPLIANCE

If you are a resident of the European Economic Area (EEA) and believe we maintain your personal data subject to the General Data Protection Regulation (GDPR), we will work with local data protection authorities to address any questions, concerns, or complaints regarding the transfer and or processing of personal data that we cannot resolve with our users directly.

## **CONTACT US**

Institute is committed to resolving complaints about your privacy and our collection or use of your personal data. Residents of the EEA with inquiries or complaints regarding this privacy policy should first contact Institute at:

Privacy Support

Address: TEDU Institute

Žabnica 82c, 1357 Notranje Gorice

Slovenia

Privacy support e-mail address: milan@spiral-living.com