

## Privacy Policy

**Latest update: 01/07/2019**

We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about our policy or our practices with regards to your personal information, please contact us at [info@sowiso.com](mailto:info@sowiso.com).

When you visit our website and use our services, you trust us with your personal information. We take your privacy very seriously. In this privacy notice, we describe our privacy policy. We seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. If there are any terms in this privacy policy that you do not agree with, please discontinue use of our Sites and our services.

This privacy policy applies to all information collected through our websites ([sowiso.com](http://sowiso.com) & [bolster.academy](http://bolster.academy), and/or any related services, sales, marketing or events (we refer to them collectively in this privacy policy as the "Sites").

Please read this privacy policy carefully as it will help you make informed decisions about sharing your personal information with us.

<b>Company</b>	SOWISO b.v.
<b>Address</b>	Science Park 400, 1098 XH Amsterdam
<b>Telephone</b>	+31 20 752 0000
<b>E-mail</b>	<a href="mailto:info@sowiso.com">info@sowiso.com</a>
<b>Website</b>	<a href="https://sowiso.com">https://sowiso.com</a> & <a href="https://bolster.academy">https://bolster.academy</a>

### What information do we collect?

The personal information you disclose to us In Short: We collect personal information that you provide to us such as name, contact information, passwords and security data, and payment information. We collect personal information that you voluntarily provide to us when registering at the Sites expressing an interest in obtaining information about us or our products and services when participating in activities on the Sites or otherwise contacting us. The personal information that we collect depends on the context of your interactions with us and the Sites, the choices you make and the products and features you use. The personal information we collect can include the following:



### **Name and Contact Data.**

We collect your first and last name, and email address.

### **Credentials.**

We collect passwords used for authentication and account access.

### **Payment Data.**

We collect data necessary to process your payment if you make purchases, such as your payment instrument number (such as a credit card number), and the security code associated with your payment instrument. All payment data is stored by our payment processor and you should review its privacy policies and contact the payment processor directly to respond to your questions. All personal information that you provide to us must be true, complete and accurate, and you must notify us of any changes to such personal information.

### **Information automatically collected**

Some information such as IP address and/or browser and device characteristics is collected automatically when you visit our Sites. We automatically collect certain information when you visit, use or navigate the Sites.

This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Sites and other technical information. This information is primarily needed to maintain the security and operation of our Sites, and for our internal analytics and reporting purposes. Like many businesses, we also collect information through cookies and similar technologies.

## **How do we use your information**

**In Short:** We process your information for purposes based on legitimate business interests, the fulfilment of our contract with you, compliance with our legal obligations, and/or your consent. We use personal information collected via our Sites for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests ("Business Purposes"), in order to enter into or perform a contract with you ("Contractual"), with your consent ("Consent"), and/or for compliance with our legal obligations ("Legal Reasons"). We indicate the specific processing grounds we rely on next to each purpose listed below. We use the information we collect or receive:



**To send administrative information to you.**

We may use your personal information to send you a product, service and new feature information and/or information about changes to our terms, conditions, and policies.

**To enforce our terms, conditions and policies.****To respond to legal requests and prevent harm.**

If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.

**For other Business Purposes.**

We may use your information for other Business Purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Sites, products, services, marketing and your experience.

**Will your information be shared with anyone?**

**In Short:** We only share information with your consent, to comply with laws, to protect your rights, or to fulfil business obligations.

We may process or share data based on the following legal basis:

**Consent**

We may process your data if you have given us specific consent to use your personal information in a specific purpose.

**Legitimate Interests**

We may process your data when it is reasonably necessary to achieve our legitimate business interests.

**Performance of a Contract**

Where we have entered into a contract with you, we may process your personal information to fulfil the terms of our contract.

**Legal Obligations**

We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).



### Vital Interests

We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved. More specifically, we may need to process your data or share your personal information in the following situations:

### Business Transfers

We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

### Business Partners

We share your name and test results with those higher education institutions you have specifically told us you are applying to.

## Do we use cookies or other tracking technologies?

**In Short:** We do use cookies and other tracking technologies to collect and store your information.

We use cookies and similar tracking technologies (like Google Analytics and Hotjar) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Policy.

## How long do we keep your information?

**In Short:** We keep your information for as long as necessary to fulfil the purposes outlined in this privacy policy unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy policy unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). No purpose in this policy will require us keeping your personal information for longer than 7 years past the termination of the user's account. When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.



## How do we keep your information safe?

**In Short:** We aim to protect your personal information through a system of organisational and technical security measures.

We have implemented appropriate technical and organisational security measures designed to protect the security of any personal information we process. However, please also remember that we cannot guarantee that the internet itself is 100% secure. Although we will do our best to protect your personal information, the transmission of personal information to and from our Sites is at your own risk. You should only access the services within a secure environment.

All user data is stored in a secure database, which cannot be accessed directly from the application but only locally from the server. Only "security-verified" authorized employees of SOWISO, with administrative clearance, have access to this. We are responsible for the hosting that will take place at a data centre of Amazon Web Services (AWS).

## What are your privacy rights?

**In Short:** In some regions, such as the European Economic Area, you have rights that allow you greater access to and control over your personal information.

You may review, change, or terminate your account at any time. In some regions (like the European Economic Area), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability.

In certain circumstances, you may also have the right to object to the processing of your personal information. To make such a request, please use the contact details provided below. We will consider and act upon any request in accordance with applicable data protection laws. If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. Please note however that this will not affect the lawfulness of the processing before its withdrawal. If you are resident in the European Economic Area and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here:

[http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm)



## Account Information

If you would at any time like to review or change the information in your account or terminate your account, you can: Contact us using the contact information provided.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, some information may be retained in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Use and/or comply with legal requirements.

## Do we make updates to this policy?

**In Short:** Yes, we will update this policy as necessary to stay compliant with relevant laws.

We may update this privacy policy from time to time. The updated version will be indicated by an updated “Revised” date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy policy frequently to be informed of how we are protecting your information.

## How can you contact us for this policy?

If you have questions or comments about this policy, you may email us at [info@sowiso.com](mailto:info@sowiso.com), call us at +31 20 752 0000 or by post to:

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