

# Privacy and Cookie Statement Prowise

January 2021

Welcome to our website! The protection of your personal data and privacy is very important to us. Below we will explain which data we process when, for which purpose and on what legal basis. It will be explained how our offered services work and how the protection of your personal data is guaranteed.

Based on Article 4(1) of the General Data Protection Regulation (“**GDPR**”), personal data means any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly.

This privacy and cookie statement can be accessed, saved and printed at any time at <https://www.prowise.com/en/privacy-and-cookie-statement/> (“**Privacy Statement**”).

In order to keep the Privacy Statement clear, we occasionally use links to refer to information and privacy statements on external websites (see also the section on Social Networks & external links in this Privacy Statement). We will make every effort to keep the links in this Privacy Statement up to date. However, as websites are constantly updated, it cannot be ruled out that links may not work correctly. If you come across such a link, please let us know, so we can include the up-to-date link.

In our role as school service provider we have committed ourselves to the Student Privacy Pledge. More information on how we process student personal data in our role as school service provider can be found in section 21 “Personal data from United States K-12 students”.

## 1. Controller

The controller within the meaning of Article 4(7) GDPR is:

Prowise B.V.  
Luchthavenweg 1B  
6021 PX Budel  
the Netherlands  
Tel.: +31 (0) 495 49 71 10  
E-mail: [info@prowise.com](mailto:info@prowise.com)



## 2. Contact person for data protection

If you have any questions about the processing of your personal data and your rights relating to data protection, please contact:

Prowise B.V.

Mr L. Loeff (privacy officer)

(+31) (0) 495 497110

privacy@prowise.com

www.prowise.com

Luchthavenweg 1b

6021 PX Budel

the Netherlands

## 3. Log files

If you open our website, we automatically register data from your device, part of which we store in server log files. The data is automatically transmitted by your browser as soon as you open our website. At this time, the following data is registered:

- time on which our website was accessed (request to the server of the host provider)
- URL of the website from which you have accessed our website
- the operating system you are using
- type and version of the browser you are using
- your IP address

By processing this data, we aim to improve the accessibility of our website from your device and enable a correct display of our website on your device or in your browser. In addition, the data helps us to optimize our website and improve the security of our systems. In addition, our system has to process your IP address to enable our website to be delivered to your device. This data is not used for marketing purposes.

Article 6(1) sentence 1 under f) GDPR constitutes the legal basis for the processing. We have a legitimate interest in presenting you with a website that has been optimized for your browser and enabling communication between our server and your terminal device. For the latter it is particularly necessary to process your IP address.

We store the data for 14 days.

### Right to object

**You have the right to object.** You can send or notify us of your objection at any time (for example via an email to [privacy@prowise.com](mailto:privacy@prowise.com)).

## 4. Cookies

Our website uses cookies. Cookies are text files that are stored on your device, for example to make it easier to use a website or to recognize the user's device and save settings etc. Cookies can store input data and settings for a website so that these do not have to be entered again each time you visit a website. Cookies contain a "cookie ID", which makes it possible to assign it to the device on which the cookie was stored. We use the following cookies for this purpose:

- Cookies that contain a randomly generated, specific identification number that allows our website to identify you or your device during your visit. These cookies are automatically deleted at the end of your visit.
- Cookies that contain a randomly generated, specific identification number that allows our website to identify you or your device. You can find the storage period either in the overview below or in your browser by displaying the cookies (usually by clicking on the 'i' next to the address bar, e.g. in Firefox or Google Chrome).

In particular, the following cookies are set by us and by the services we use:

Cookie	Provider /service	Retention period	Description	Scope	Functional/statistics/marketing
pw_cookieconsent_status	Prowise	1 year	Used to keep track of consent given	www.prowise.com	Functional
pw_cookieconsent_analytics	Prowise	1 year	Used to keep track of consent given for statistical cookies	www.prowise.com	Functional
pw_cookieconsent_tracking	Prowise	1 year	Used to track given consent for marketing cookies	www.prowise.com	Functional
pw_sso_sessionid	Prowise	24 hours	Used to determine if you are still logged in and if you are still the same user	login.prowise.com	Functional
pw_sso_state	Prowise	24 hours	Contains the cryptographically secure display of your session with our SSO	login.prowise.com	Functional
locale	Prowise	1 year	Stores a language preference used by some of our services	www.prowise.com	Functional
_icl_current_language	Prowise	1 year	Stores a language preference used by some of our services	www.prowise.com	Functional

login	Prowise	Session	Used to store session information when you are logged in to our account portal	www.prowise.com	Functional
user_details	Prowise	Session	Can be used if you are logged in on the website to display your name	www.prowise.com	Functional
oidc.user:https://login.prowise.com:<application id>	Prowise	Session	Your user data will be used by the relevant app to authenticate with the backend APIs	<app>.prowise.com	Functional
oidc.<random id>	Prowise	Login	Your ID is used by the relevant app for authentication purposes	<app>.prowise.com	Functional
_ga	Google Analytics	14 months	Used for statistical recording by Google Analytics	www.prowise.com	Statistics
_gat	Google Analytics	1 minute	When there is a lot of traffic, this cookie limits the data collected by Google Analytics	www.prowise.com	Statistics
_gid	Google Analytics	24 hours	Used to identify the user	www.prowise.com	Statistics

All cookies placed by us on the website in question and further information about them can also be viewed via your browser at any time.

### Right to object

#### You have the right to object.

In your browser settings you can limit or completely prevent the placing of cookies. You can also set cookies to be deleted when you close the browser.

For information on how to delete cookies and change the cookie settings in the most commonly used browsers, please consult the following websites:

- Google Chrome: [Website](#)
- Mozilla Firefox: [Website](#)
- Apple Safari: [Website](#)
- Microsoft Internet Explorer: [Website](#)
- Microsoft Edge: [Website](#)

Other services used by us also use cookies. For the separate services we point out the use of cookies separately.

## 5. Information about Google services

Our website uses various services of Google Ireland Limited (“**Google**”), Gordon House, Barrow Street, Dublin 4, Ireland.

More information about the separate specific services of Google that we use on this website can be found further down in the Privacy Statement.

Through the integration of Google services, Google may collect and process data, including personal data. It cannot be ruled out that Google may also share the data with a server in a third country.

As evidenced by Google's Privacy Shield certification (which can be consulted at <https://www.privacyshield.gov/list> under the search term 'Google'), Google has undertaken to comply with the EU-US Privacy Shield Framework and the Swiss-US Privacy Shield Framework on the collection, use and storage of personal data from the EU member states and Switzerland. By means of this certification, Google, including Google LLC and its US subsidiaries, has declared that it adheres to the Privacy Shield principles. For more information on this subject, please visit <https://www.google.de/policies/privacy/frameworks/>. In addition, Prowise has entered into a data processing agreement with Google containing model contract clauses that have been approved by the European Commission.

Prowise does not have any influence on which data Google actually collects and processes. However, Google indicates that, in principle, the following data, including personal data, may be processed:

- protocol data (in particular the IP address)
- location data
- uniform application numbers
- cookies and similar technologies

For information about the cookies Google uses, please visit <https://policies.google.com/technologies/types>.

If you are signed in to your Google account – depending on your account settings – Google may add the processed data to your account and treat it as personal data. Google states the following about this, among other things:

“When you are not signed in to a Google Account, we store the information we collect with unique identifiers tied to the browser, application, or device you are using. This helps us do things like maintain your language preferences across browsing sessions.

When you are signed in, we also collect information that we store in your Google Account, which we treat as personal information.” (<https://www.google.com/intl/de/policies/privacy/index.html>)

You can prevent this data from being directly added to your account by logging off from your Google Account or by changing the account settings in your Google Account. You can also prevent the placement of cookies, in so far as Google places them, through the settings of your browser software; however, please note that in this case you may not be able to fully use all functions of this website.

For information on how to remove cookies in the most commonly used browsers, please consult the following websites:

- Google Chrome: [Website](#)
- Mozilla Firefox: [Website](#)
- Apple Safari: [Website](#)
- Microsoft Internet Explorer: [Website](#)

For more information, please consult Google's privacy policy, which you can find here <https://www.google.com/policies/privacy/>.

For more information about Google's privacy settings, please visit <https://privacy.google.com/take-control.html>.

## 6. Google Analytics

Our website uses Google Analytics, a web analytics service of Google Ireland Limited ("**Google**"), Gordon House, Barrow Street, Dublin 4, Ireland.

Google Analytics uses cookies, which are text files stored on your device, to help analyse how you use the website you visit. Google Analytics can also use "web beacons" (non-visible graphic images). These web beacons can be used to analyse data such as visitor traffic on websites. The information collected by cookies and web beacons about the use of our website (including the user's IP address) will be sent to a server of Google, possibly in the United States or other third countries, and will be stored there. Google may share this data with contractual partners of Google.

Information about Google's Privacy Shield certification and other relevant information about the data processing by Google in the context of the use of the Google services can be found in section 5 "Information about Google services" of this Privacy Statement.

The following data is processed by Google:

- online ID's (including cookie-ID's)
- IP-address
- device ID's

For more information about the processed data, please visit <https://policies.google.com/privacy?hl=nl#infocollect> under "Information we collect as you use our services" and <https://privacy.google.com/businesses/adsservices/>.

We only use Google Analytics with an activated IP anonymization. As a result, your IP address will be truncated by Google within the Member States of the European Union and other contracting states of the European Economic Area. It is only in exceptional cases that the full IP address will first be sent to a Google server in the US and truncated there.

Furthermore, we have concluded a data processing agreement with Google for the use of Google Analytics (Article 28 GDPR). Google processes the data on our instructions in order to analyse your use of the website, to compile reports on website activities for us and to provide us with other services related to the use of the website and the internet. Google may share this data with third parties if required by law or in so far as third parties process this data on the instructions of Google.

We have integrated Google Analytics in order to analyse user behaviour on our website so that we can respond to it. In this way we can continuously improve our offer.

The legal basis for the processing of personal data described here is your consent in accordance with Article 6(1)(f) GDPR.

As part of the processing, Google has the right to engage subcontractors. For an overview of these subcontractors, please visit <https://privacy.google.com/businesses/subprocessors/>.

#### Right of withdrawal

**You have the right to withdraw your consent at any time without this affecting the lawfulness of the processing that took place on the basis of the consent given until the withdrawal.** Click [here](#) to change your cookie settings.

The processed data will be stored for 14 months and automatically deleted at the end of this storage period.

You will find more information about the processing of data in relation to Google Analytics in Google's privacy statement: <https://support.google.com/analytics/answer/6004245?hl=en>.

For more information about Google's privacy settings, please visit [https://privacy.google.com/take-control.html?categories\\_activeFI=sign-in](https://privacy.google.com/take-control.html?categories_activeFI=sign-in).

## 7. Google Ads (previously AdWords)

This website uses Google Ads and, in the context of Google Ads (formerly Google AdWords), Conversion Tracking, an online advertising service of Google Ireland Limited ("**Google**"), Gordon House, Barrow Street, Dublin 4, Ireland.

Google Ads and Google Conversion Tracking are analytics services of Google. By clicking on an advertisement served by Google, a cookie, a text file, is stored on your device, by means of which the use of the website you visited can be analysed. The information collected by cookies about the use of this website (including your IP

address) will be sent to a server of Google, possibly in the United States or other third countries, and will be stored there. These cookies expire after 9 months. If you visit certain pages of us and the stored cookie has not yet expired, Google and we can identify that someone clicked on the advertisement and was redirected to our website. Every Ads customer receives a different cookie. In this way, cookies can be traced via the websites of Ads customers.

Information about Google's Privacy Shield certification and other relevant information about the data processing by Google in the context of the use of the Google services can be found in section 5 "Information about Google services" of this Privacy Statement.

We have integrated Google Ads in order to analyse the advertising policy so that we can respond to it. In this way we can continuously improve our advertising policy.

The legal basis for the processing of personal data described here is your consent in accordance with Article 6(1)(f) GDPR.

#### Right of withdrawal

**You have the right to withdraw your consent at any time without this affecting the lawfulness of the processing that took place on the basis of the consent given until the withdrawal.** Click [here](#) to change your cookie settings.

For more information, please consult Google's privacy policy, which you can find here [www.google.com/policies/privacy/](http://www.google.com/policies/privacy/).

For more information about Google's privacy settings, please visit [https://privacy.google.com/take-control.html?categories\\_activeEl=sign-in](https://privacy.google.com/take-control.html?categories_activeEl=sign-in).

## 8. Use of Google Web Fonts

Our website uses external fonts, Google Fonts, of Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland.

The Web Fonts are integrated into the Google services via an interface (API). Through the integration of the Web Fonts, Google may collect and process data (including personal data). It cannot be ruled out that Google may also share the data with a server in a third country.

Information about Google's Privacy Shield certification and other relevant information about the data processing by Google in the context of the use of the Google services can be found in section 5 "Information about Google services" of this Privacy Statement.

We do not collect any data ourselves in connection with the use of Google Fonts.



We have integrated Google Fonts in order to be able to display uniform fonts on your device.

The legal basis for the processing of personal data described here is Article 6(1)(f) GDPR. Our required legitimate interest in this respect lies in the overall usefulness of a uniform display of the fonts. Because of the possibility of a uniform display, the design costs are lower than if we would have had to respond to different fonts from different operating systems and browsers with our own graphically modified websites. Google also has a legitimate interest in the collected (personal) data in order to improve its own services.

### Right to object

**You have the right to object.** You can send or notify us of your objection at any time (for example via an email to [privacy@prowise.com](mailto:privacy@prowise.com)).

For more information, please visit the following links:

- [www.google.com/fonts#AboutPlace:about](http://www.google.com/fonts#AboutPlace:about)
- <https://developers.google.com/terms/>

## 9. Use of YouTube

We use YouTube videos on our website. YouTube is a service of YouTube LLC ("**YouTube**"), 901 Cherry Ave., San Bruno, CA 94066, USA,. YouTube LLC is a subsidiary of Google Ireland Limited ("**Google**"), Gordon House, Barrow Street, Dublin 4, Ireland.

YouTube is integrated into our website by means of an "iFrame". When loading this iFrame, YouTube or Google may collect and process data, including personal data. It cannot be ruled out that YouTube or Google may also share the data with a server in a third country.

Information about Google's Privacy Shield certification and other relevant information about the data processing by Google in the context of the use of the Google services can be found in section 5 "Information about Google services" of this Privacy Statement.

We use YouTube in the privacy mode. According to the information made available by Google, this allows a video to be played without the use of cookies to record user behaviour. We do not collect any data ourselves when you watch a YouTube video on our website.

We have integrated YouTube in order to be able to present various videos to you on our website, so that you can view them directly on our website.

The legal basis for the processing of personal data described here is Article 6(1)(f) GDPR. Our required legitimate interest in this respect lies in the overall usefulness YouTube offers. The integration of external videos relieves our server and allows us to use the saved resources differently. This can, among other things, increase the

stability of our server. Furthermore, YouTube and Google have a legitimate interest in the collected data and personal data to improve their own services.

## Right to object

**You have the right to object.** You can send or notify us of your objection at any time (for example via an email to [privacy@prowise.com](mailto:privacy@prowise.com)).

In addition, you can change your cookie settings (for example delete or block cookies, etc.). For more information, see section 4) Cookies.

## 10. Use of jQuery

We use jQuery on our website. JQuery is a free Javascript library/framework under the MIT license offered by JS Foundation, Inc., Attn: Privacy Office, 1 Letterman Drive, San Francisco, CA 94129, [legal@JS.Foundation](mailto:legal@JS.Foundation).

We integrate jQuery via the server of the JS Foundation. The library is made available by the JS Foundation and loaded onto our website with a corresponding command, so that our website can use the library.

The libraries are integrated with jQuery via an interface (API). Through the integration of the libraries, JS Foundation may collect data, including personal data, and process it.

JS Foundation indicates that the following data, including personal data, may be processed:

- visits/accessing of pages
- duration of visits/accessing of pages
- landing and exit pages
- location
- IP address
- browser technology.

In addition, jQuery Foundation indicates that this data may also be shared with third parties.

For more information, please visit <https://js.foundation/about/governance/privacy-policy>.

JS Foundation may place cookies on your device for the use of jQuery.

For information on how to remove cookies in the most commonly used browsers, please consult the following websites:

- Google Chrome: [Website](#)
- Mozilla Firefox: [Website](#)
- Apple Safari: [Website](#)
- Microsoft Internet Explorer: [Website](#)

We have integrated jQuery in order to integrate the libraries required for the optimal functioning of the website, in order to be able to use them.

The legal basis for the processing of personal data described here is Article 6(1)(f) GDPR. Our required legitimate interest in this respect lies in the overall usefulness of an integration of jQuery. The possibility of integrating the library through JS Foundation reduces our maintenance costs and the loading time of the website. jQuery Foundation also has a legitimate interest in the collected data and personal data to improve its own services.

### Right to object

**You have the right to object.** You can send or notify us of your objection at any time (for example via an email to [privacy@prowise.com](mailto:privacy@prowise.com)).

The data will be deleted as soon as it is no longer necessary to achieve the purpose of its collection.

For more information about the operation of jQuery, please visit: <https://jquery.org/support/>.

## 11. Use of Font Awesome

Our website uses the service Font Awesome. Font Awesome is a service of Fonticons, Inc., 6 Porter Road, Apartment 3R, Cambridge, MA 02140, USA.

Font Awesome is a CSS and LESS based font and icon toolkit. When you open a page, the browser you are using loads the necessary web fonts into your browser cache in order to display texts and fonts correctly. For this, the browser you are using must connect to the Fonticons Inc. servers. Through the integration of Font Awesome, Fonticons Inc. may collect and process personal data. It cannot be ruled out that Fonticons Inc. may also share the data with a server in a third country.

For more information about Font Awesome, please visit: <https://fontawesome.com/help>.

We do not collect any data ourselves in connection with the use of Font Awesome.

We have integrated Font Awesome in order to be able to display uniform fonts and icons on your device.

The legal basis for the processing of personal data described here is Article 6(1)(f) GDPR. Our required legitimate interest in this respect lies in the overall usefulness of a uniform display of the fonts and icons. Because of the possibility of a uniform display, the design costs are lower than if we would have had to respond to different fonts from different operating systems and browsers with our own graphically modified websites.

### Right to object

**You have the right to object.** You can send or notify us of your objection at any time (for example via an email to [privacy@prowise.com](mailto:privacy@prowise.com)).

The provision of personal data is neither legally nor contractually required nor necessary for the conclusion of an agreement. You are not obliged to provide personal data either. However, if you do not provide the personal data, you may not be able to use, or fully use, our website and the display of the website may change.

For more information, please consult Font Awesome's privacy policy, which you can find here:

<https://fontawesome.com/privacy>.

## 12. Presenter account

You can create a user account on our website for our Presenter web application.

In the context of registering for an account, the data entered in the input fields will be processed by us. This includes the following data:

- emailadres
- first name
- surname prefix
- surname
- language/country
- type of user
- password

The data is required to create a user account for you.

When the registration is transmitted, the following data are also processed:

- your IP-adres
- date and time of transmission

The registration takes place according to the double-opt-in procedure. After registration, you will receive an activation link at the e-mail address provided by you, which you must confirm and/or activate. In this way we check whether the email address entered on our website is actually yours. If the confirmation or activation link is not used within 48 hours, the registration will no longer be performed and the confirmation or activation link will expire. In that case you have to perform the registration procedure again. If an email address is not confirmed within the time frame mentioned above, we will delete the registration data.

If you click on the activation link, we will process the following data as part of the double-opt-in:

- your IP-adres
- date and time of transmission

We process the personal data in order to provide the user with their own user account. The purpose of processing the double-opt-in data is to prevent misuse of the registration.

The legal basis for the processing of personal data described here is Article 6(1)(f) GDPR. We have a legitimate interest in providing you with a user account and thus giving you the opportunity to make full use of our Presenter web application. We have an interest in processing the double-opt-in data to prevent misuse.

### Right to object

**You have the right to object.** You can deactivate and/or delete your user account yourself at any time.

You can also send or notify us of your objection at any time (for example via an email to [privacy@prowise.com](mailto:privacy@prowise.com)).

The processed data will only be stored for as long as is necessary for the intended purpose or as required by law.

The provision of personal data is neither legally nor contractually required nor necessary for the conclusion of an agreement. You are not obliged to provide personal data either. However, without the required data we cannot create a user account for you and give you access to our web application.

## 13. Form to request forgotten password

Our website contains a form by means of which you can request a forgotten password. If you contact us using this form, the e-mail address entered in the input field will be processed by us.

When the request is transmitted, the following data will also be stored:

- your IP address
- date and time of transmission

We process the personal data in order to process your request regarding the forgotten password and contact you in connection with answering your request. The other personal data processed during transmission (IP address, date and time of transmission) are intended to prevent misuse of this functionality.

The legal basis for the processing of personal data described here is Article 6(1)(f) GDPR. We have a legitimate interest in giving you the opportunity to contact us at any time so that we can send you a new password.

The personal data will only be processed for as long as is necessary for offering the functionality.

The additional personal data collected during the transmission of the form to request a forgotten password will be deleted after 52 days at the latest.

### Right to object

**You have the right to object to the processing of your personal data at any time** You can send or notify us of your objection at any time (for example via an email to [privacy@prowise.com](mailto:privacy@prowise.com)).

## 14. Contact Form

Our website contains contact forms that can be used to contact us digitally. If you contact us using this form, the data entered in the input field will be processed by us.

When the message is transmitted, the following data will also be stored:

- your IP address
- date and time of transmission

Please note that the scope of the personal data collected in the context of the contact form also depends on which data you provide in the message body in the contact form.

We process the personal data in the context of both obligatory and optional data in order to process your contact request and contact you in connection with answering your request. The other personal data processed during transmission (IP address, date and time of transmission) are intended to prevent misuse of the contact form.

The legal basis for the processing of personal data described here is Article 6(1)(f) GDPR. We have a legitimate interest in giving you the opportunity to contact us at any time so that we can answer your requests.

The personal data will only be processed for as long as is necessary for offering the functionality.

The additional personal data collected during the transmission of the contact form will be deleted after 52 days at the latest.

### Right to object

**You have the right to object to the processing of your personal data at any time** You can send or notify us of your objection at any time (for example via an email to [privacy@prowise.com](mailto:privacy@prowise.com)).

## 15. Applying for a job

It is possible to apply for a job on our website. For more information on how we handle the data of applicants, please consult the privacy statement for applicants available on the relevant jobs page of our website.

## 16. Cloudflare

Our website uses the service Cloudflare. Cloudflare is a service of Cloudflare, Inc., +1 (650) 319-8930, 101 Townsend St, San Francisco, CA 94107, USA, which also provides this service.

Cloudflare offers a Content Delivery Network that protects our website against attacks on our server. This means that before your data ends up on our website, it is first transferred to a network of different servers (data

centres) of the Cloudflare service. In addition, the data from our website and the data you send to us are also transferred to various data centres of the Cloudflare network.

The server of the Cloudflare network thus serves as an intermediate buffer, as it were, which enables data to be transferred to the Cloudflare network.

For this purpose, the data is sent to different servers in different locations.

In this context, it is likely that Cloudflare will also send the data to a server in a third country that is not a member of the EU.

We cannot influence which servers the data is ultimately sent through.

An overview of the server locations that are currently being used in the Cloudflare network can be consulted at: [www.cloudflarestatus.com](http://www.cloudflarestatus.com).

As evidenced by Cloudflare's Privacy Shield certification (which can be consulted at : <https://www.privacyshield.gov/list> under the search term 'cloudflare'), Cloudflare, Inc. has undertaken to comply with the EU-US Privacy Shield Framework published by the US Department of Commerce and the Swiss-US Privacy Shield Framework on the collection, use and storage of personal data from the EU member states and Switzerland. By means of this certification, Cloudflare has declared that it adheres to the Privacy Shield principles. For more information about this subject, please visit <https://www.cloudflare.com/security-policy/>. In addition, Prowise has entered into a data processing agreement with Cloudflare containing model contract clauses that have been approved by the European Commission.

The data sent to the Cloudflare network will be stored for 4 hours, after which the data will be deleted.

By processing the personal data, we aim to increase the reliability and access speed of our website, improve security, prevent attacks on our website or detect attacks early and thus improve the overall use of the website.

The legal basis for the processing of personal data described here is Article 6(1)(f) GDPR. Our required legitimate interest in this respect lies in improving the quality of our services and the security of our website, as well as to guarantee its fast and reliable use. Furthermore, we have a legitimate interest in guaranteeing the stability of our servers and to be able to compensate for fluctuations in capacity.

## Right to object

**You have the right to object.** You can send or notify us of your objection at any time (for example via an email to [privacy@prowise.com](mailto:privacy@prowise.com)).

## 17. Azure CDN

Our website uses the service Azure CDN. Azure CDN is a service of Microsoft Corporation, One Microsoft Way, Redmond, Washington 98052, USA.

Azure CDN offers a Content Delivery Network that protects our website against attacks on our server. This means that before your data ends up on our website, it is first transferred to a network of different servers (data centres) of the Azure CDN service. In addition, the data from our website and the data you send to us are also transferred to various data centres of the Azure CDN network.

The server of the Azure CDN network thus serves as an intermediate buffer, as it were, which enables data to be transferred to the Azure CDN network.

For this purpose, the data is sent to different servers in different locations.

In this context, it is likely that Azure CDN will also send the data to a server in a third country that is not a member of the EU.

We cannot influence which servers the data is ultimately sent through.

An overview of the server locations that are currently being used in the Azure CDN network can be consulted at: <https://azure.microsoft.com/de-de/global-infrastructure/regions/>.

As evidenced by Microsoft Corporation's Privacy Shield certification (which can be consulted at : <https://www.privacyshield.gov/list> under the search term 'microsoft corporation'), Microsoft Corporation has undertaken to comply with the EU-US Privacy Shield Framework published by the US Department of Commerce and the Swiss-US Privacy Shield Framework on the collection, use and storage of personal data from the EU member states and Switzerland. By means of this certification, Microsoft Corporation has declared that it adheres to the Privacy Shield principles. For more information about this subject, please visit <https://privacy.microsoft.com/nl-nl/privacystatement>. In addition, Prowise has entered into a data processing agreement with Microsoft containing model contract clauses that have been approved by the European Commission.

The data sent to the Microsoft network will be stored for 90 days, after which the data will be deleted.

By processing the personal data, we aim to increase the reliability and access speed of our website, improve security, prevent attacks on our website or detect attacks early and thus improve the overall use of the website.

The legal basis for the processing of personal data described here is Article 6(1)(f) GDPR. Our required legitimate interest in this respect lies in improving the quality of our services and the security of our website, as well as to guarantee its fast and reliable use. Furthermore, we have a legitimate interest in guaranteeing the stability of our servers and to be able to compensate for fluctuations in capacity.

### Right to object

**You have the right to object.** You can send or notify us of your objection at any time (for example via an email to [privacy@prowise.com](mailto:privacy@prowise.com)).



## 18. Contact us

You can contact us by post, phone or email.

If you contact us by post, we may in particular process your address details (e.g. surname, first name, street, city, postal code), date and time of receipt of the letter, as well as the information contained in your letter itself.

If you contact us by phone, we may in particular process your phone number and any information collected during the call such as your name, e-mail address, time of the call and details of your request.

If you contact us by email, we may in particular process your email address, the time of the e-mail and any data collected from your email (including any attachments).

We process the data referred to above in order to process the contact request and to contact you to handle your request.

The legal basis for the processing of personal data described here is Article 6(1)(f) GDPR. We have a legitimate interest in giving you the opportunity to contact us at any time so that we can answer your requests.

The personal data will be deleted as soon as it is no longer necessary to achieve the purpose of its processing.

### Right to object

**You have the right to object.** You can send or notify us of your objection at any time (for example via an email to [privacy@prowise.com](mailto:privacy@prowise.com)).

## 19. Newsletter

You can subscribe to our newsletter on our website.

If you subscribe to our newsletter, we will process the following data (including personal data):

- e-mail address
- first name and surname
- preference for type of mailing(s)
- functionality/role
- date and time
- IP address
- metadata of the action

In order to be able to demonstrate that consent has been granted and to process your unsubscription from the newsletter, for each user profile that is created with an e-mail address confirmed by a double-opt-in procedure, we store the following data relating to the subscription, modification, confirmation and unsubscription to the newsletter:

- date and time
- IP address

In addition, we process the following data, including personal data, as part of the subscription to our newsletter:

- e-mail address
- first name and surname
- preference for type of mailing(s)
- functionality/role
- date and time
- IP address
- action type (modification, consent modification)
- metadata of the action

Our newsletters are sent by the following parties, in which context these parties process your data on our behalf:

- SendGrid Inc., 1801 California Street Suite 500 Boulder, CO 80202 United States ("**SendGrid**");
- The Rocket Science Group LLC, trading under the name MailChimp, 675 Ponce de Leon Avenue Northeast, Suite 5000 Atlanta, GA 30308 United States ("**MailChimp**").

SendGrid Inc. is a subsidiary of Twilio Inc., 645 Harrison Street 3rd Floor San Francisco, CA 94107 United States ("**Twilio**"). As evidenced by Twilio Inc.'s Privacy Shield certification (which can be consulted at : <https://www.privacyshield.gov/list> under the search term 'Twilio' or "SendGrid"), Twilio has undertaken to comply with the EU-US Privacy Shield Framework and the Swiss-US Privacy Shield Framework on the collection, use and storage of personal data from the EU member states and Switzerland. By means of this certification, Twilio Inc., including its subsidiary SendGrid Inc., has declared that it adheres to the Privacy Shield Principles. For more information about this subject, please visit <https://sendgrid.com/policies/privacy/privacy-shield-certification/>. In addition, Prowise has entered into a data processing agreement with SendGrid containing model contract clauses that have been approved by the European Commission.

As evidenced by MailChimp's Privacy Shield certification (which can be consulted at : <https://www.privacyshield.gov/list> under the search term "The Rocket Science Group"), MailChimp has undertaken to comply with the EU-US Privacy Shield Framework and the Swiss-US Privacy Shield Framework on the collection, use and storage of personal data from the EU member states and Switzerland. By means of this certification, MailChimp has declared that it adheres to the Privacy Shield Principles. For more information about this subject, please visit <https://mailchimp.com/help/about-mailchimp-the-eu-swiss-privacy-shield-and-the-gdpr/>. In addition, Prowise has entered into a data processing agreement with MailChimp containing model contract clauses that have been approved by the European Commission.

Please note that we analyse your usage behaviour when we send out the newsletter. We can register whether the newsletter sent is opened. The links in the newsletters contain UTM parameters.

UTM parameters enable campaign-specific tracking in Google Analytics. For you, this means that when you click on a link with UTM parameters, this click is registered in Google Analytics. In this way we can track how you respond to our individual newsletters (e.g. whether you have opened the newsletter), how many users have accessed our website via certain links and, for example, whether they have clicked on an image or text link in a newsletter before.

We use the following UTM parameters:

- medium: This parameter describes the medium in which the link is embedded. Examples: e-mail, social media or website
- source: With these UTM parameters we define the source of the link. These can be newsletters, websites, apps or social media channels.
- campaign: This type of UTM parameters indicates the actual campaigns. For example, if we send a newsletter to you every month, the individual newsletters can be analysed separately.
- term: Keywords to better identify the link
- content: In a campaign, we insert different elements to be tracked in order to unambiguously identify them and analyse them separately. Examples: button, image or video

The data will only be collected in pseudonymized form.

In the context of newsletter subscription, you consent to the processing of your personal data (Article 6(1)(a) GDPR), in which context we verify the subscription by means of a double-opt-in procedure.

In a first step, you enter the required data (e.g. e-mail address) and consent to the processing of your personal data by ticking the relevant box. In a second step, you will then automatically receive an email with a confirmation or activation link which you have to confirm or activate. In this way we check whether the email address entered on our website is actually yours.

We collect and process the user's email address in order to send the user a newsletter. By collecting and processing other personal data in the context of the subscription, we want to prevent misuse of our newsletter or the e-mail address used. In addition, by means of the processing described above we want to be able to demonstrate the consent given by you.

By processing cookie and measurement data, we want to enable and register the success and scope of our newsletter.

The legal basis for the processing of personal data required for the technical provision of the newsletter to you and for the processing of the cookie and measurement data is your consent in accordance with Article 6(1)(a) GDPR.

The legal basis for the processing of the other personal data is our legitimate interest in accordance with Article 6(1)(f) GDPR. We have a legitimate interest in being able to demonstrate the consent given by you. In addition, we have a legitimate interest in preventing or demonstrating misuse of our newsletter.

## Right of withdrawal

### Right of withdrawal

**You have the right to withdraw your consent at any time without this affecting the lawfulness of the processing that took place on the basis of the consent given until the moment withdrawal.** You can send the withdrawal of your consent or notify us of the withdrawal of your consent at any time (for example via an email to [privacy@prowise.com](mailto:privacy@prowise.com)).

You can also withdraw your consent by clicking on the relevant unsubscribe link in our newsletter.

## Right to object

In so far as the processing of your data is not covered by your consent (in particular protocol files), you have a right to object.

### Right to object

You can send or notify us of your objection at any time (for example via an email to [privacy@prowise.com](mailto:privacy@prowise.com)).

The data will be deleted as soon as it is no longer necessary to achieve the purpose of its processing. Your subscription data will therefore only be stored for as long as the subscription to the newsletter is active. The tracking and cookie data will be deleted after 14 months. If you do not confirm the email as part of the double-opt-in procedure, your subscription will be automatically deleted after 1 day.

## 20. Social networks and external links

In addition to this website, we also manage profiles on various social media platforms that you can access via the corresponding buttons on our website. If you visit such a profile, personal data may be sent to the providers of the social network.

Please note that, in this context, user data is also sent to a server in a third country and may therefore be processed outside the European Union. Providers from the United States that are certified in accordance with the Privacy Shield are obliged to comply with the privacy standards of the EU. For more information about this subject, please visit <https://www.privacyshield.gov/Program-Overview>.

It is possible that, in addition to storing the data you specifically entered in this social network, the provider of this social network processes other data.

In addition, the provider of the social network may also process the most important data of the computer system from which you visit the network, such as your IP address, the processor type used and the browser version and plug-ins.

If you are logged into the network in question with your personal user account during your visit to such a website, this network may assign the visit to this account.

The purpose and scope of the data processing by the medium in question and the relevant further processing of your data as well as your rights in this respect can be found in the provisions of the data controller in question, for example on:

**Facebook (Facebook, Inc., 1 Hacker Way, Menlo Park, CA 94025, USA):**

- For fan pages: Provision on joint processing of personal data (Article 26(1) GDPR): [https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum);
- Privacy Statement Facebook: <https://www.facebook.com/about/privacy/>;
- Opt-out option: <https://www.facebook.com/settings?tab=ads> and <http://www.youronlinechoices.com/>;
- Privacy Shield certification: <https://www.privacyshield.gov/participant?id=a2zt0000000GnywAAC&status=Active>.

**Twitter (Twitter Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA):**

- Privacy statement: <https://twitter.com/en/privacy>;
- Opt-out option: <https://twitter.com/settings/account/personalization>;
- Privacy Shield certification: <https://www.privacyshield.gov/participant?id=a2zt0000000TORzAAO&status=Active>.

**Instagram (Instagram Inc., 1601 Willow Road, Menlo Park, CA, 94025, USA):**

- Privacy statement and opt-out option: <https://help.instagram.com/155833707900388>.

**Google en YouTube (Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA):**

- Privacy statement: <https://policies.google.com/privacy>;
- Opt-out -option: <https://adssettings.google.com/authenticated>;
- Privacy Shield certification: <https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>.

**LinkedIn (Ireland Unlimited Company Wilton Place, Dublin 2, Ireland):**

- Privacy statement: <https://www.linkedin.com/legal/privacy-policy>;
- Opt-out option: <https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>;
- Privacy Shield certification: <https://www.privacyshield.gov/participant?id=a2zt00000001OUZAA0&status=Active>.

Pinterest (Pinterest Inc., 635 High Street, Palo Alto, CA, 94301, USA):

- Privacy statement: <https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out;>
- Privacy Shield certification: [https://www.privacyshield.gov/participant?id=a2zt00000008VVzAAM.](https://www.privacyshield.gov/participant?id=a2zt00000008VVzAAM)

We also note that our website contains links to external websites of third parties, where we have no influence on the processing of data on these external websites

## 21. Personal data from United States K-12 students

In our role as school service provider for United States elementary and secondary schools we have committed ourselves to the Student Privacy Pledge. For more information about the Student Privacy Pledge, please visit this [website](#).

The Student Privacy Pledge commitments apply to Student Personally Identifiable Information (“PII”) which has the same definition as “covered information” under California’s Student Online Personal Information Protection Act (“SOPIPA”).

In our role as school service provider we will:

- collect, use, share, and retain Student PII only for purposes for which we were authorized by the educational institution/agency, teacher or the parent/student.
- disclose clearly in contracts or privacy policies, including in a manner easy for institutions and parents to find and understand, what types of Student PII we collect, if any, and the purposes for which the information we maintain is used or shared with third parties.
- support access to and correction of Student PII by the student or their authorized parent, either by assisting the educational institution in meeting its requirements or directly when the information is collected directly from the student with student/parent consent.
- maintain a comprehensive security program that is reasonably designed to protect the security, confidentiality, and integrity of Student PII against risks – such as unauthorized access or use, or unintended or inappropriate disclosure – through the use of administrative, technological, and physical safeguards appropriate to the sensitivity of the information.
- provide resources to support educational institutions/agencies, teachers, or parents/students to protect the security and privacy of Student PII while using the educational service.
- require that our vendors with whom Student PII is shared in order to deliver the educational service, if any, are obligated to follow these same commitments for the given Student PII.
- allow a successor entity to maintain the Student PII, in the case of our merger or acquisition by another entity, provided the successor entity is subject to these same commitments for the previously collected Student PII.

- incorporate privacy and security when developing or improving our educational products, tools, and services and comply with applicable laws.

In our role as school service provider we will not:

- collect, maintain, use or share Student PII beyond that needed for authorized educational/school purposes, or as authorized by the parent/student.
- sell student PII.
- use or disclose student information collected through an educational/school service (whether personal information or otherwise) for behavioral targeting of advertisements to students.
- build a personal profile of a student other than for supporting authorized educational/school purposes or as authorized by the parent/student.
- make material changes to School Service Provider education privacy policies without first providing prominent notice to the users and/or account holder(s) (i.e., the institution/agency, or the parent/student when the information is collected directly from the student with student/parent consent) and allowing them choices before data is used in any manner inconsistent with terms they were initially provided; and not make material changes to other policies or practices governing the use of Student PII that are inconsistent with contractual requirements.
- knowingly retain Student PII beyond the time period required to support the authorized educational/school purposes, or as authorized by the parent/student.

## 22. Security

We secure our website and other systems by taking technical and organizational measures against loss of, destruction of, access to, alteration of or dissemination of your data by unauthorized parties. However, despite regular checks, it is not possible to provide full protection against all dangers.

## 23. Amendments to the Privacy Statement

Legislative changes or changes to our internal processes may require this privacy statement to be amended. If such an amendment has been implemented, we will inform you of this at the start of the privacy statement.

We recommend you consult this privacy statement regularly so that you are aware of these amendments.

## 24. Withdrawing consent

You have the right to withdraw any consent you have previously given with effect for the future at any time without this affecting the lawfulness of the processing that took place on the basis of the consent given until the moment withdrawal.

## 25. Objection

### **Right to object**

In so far as we state our legitimate interest or a legitimate interest of a third party as a lawful basis for the processing of personal data (Article 6(1), sentence 1 under f) GDPR, you have a **right to object** in accordance with Article 21 GDPR.

In conformity with Article 21 GDPR you have the right:

to object to the processing of your personal data at any time We will then no longer process the personal data for direct marketing purposes or related profiling purposes.

Following an objection, we will no longer process your personal data for any other purposes either, unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims (see Article 21(1) GDPR, the limited right of objection). In this case, you must state the reasons for the objection relating to your specific situation.

You can also object to the processing of your personal data for reasons relating to your specific situation, which are processed for scientific or historical research purposes or statistical purposes in accordance with Article 89(1) GDPR, unless the processing is necessary for the performance of a task in the public interest (Article 21(6) GDPR).

## 26. Rights of data subjects

You have the following rights

- Right of access (Article 15 GDPR)
- Right to rectification (Article 16 GDPR)
- Right to object (Article 21 GDPR)
- Right to be forgotten (Article 17 GDPR)
- Right to restriction of processing (Article 18 GDPR)
- Right to data portability (Article 20 GDPR)

For such requests, please contact [privacy@prowise.com](mailto:privacy@prowise.com). Please note that for such requests, we need to verify that you are actually the person in question.

You have the right to submit a complaint about the manner in which we handle your data. If you have a complaint, we prefer to resolve it with you ourselves. Therefore, please contact us if you have a complaint. If we cannot come to a solution together, you have the right to submit your complaint to the Dutch Data Protection Authority.



No automated decision making takes place via our website.

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