

# DATA PRIVACY NOTICE

Your privacy matters to CertScanner (CS) and when you are using our services it is important that you understand how we will collect and protect your personal data.

Our registered users ("Clients") share their professional identities, engage with their network, exchange knowledge and professional insights, post and view relevant content, learn and develop skills, and find learning opportunities. Content and data on some of our Services is viewable to non-client ("Visitors").

As a Visitor or Client of our Services, the collection, use and sharing of your personal data is subject to this Privacy Policy and other documents referenced in this Privacy Policy, as well as updates

## **WHO IS SUBJECT TO THIS NOTICE:**

This notice applies to all data subjects whose personal data is processed by CS.

## **DEFINITIONS:**

**"CertScanner," "us," "we," or "our"** means CertScanner B.V., a limited liability company incorporated under the laws of the Netherlands, and having its registered address at Madame Curieweg 2-4, 8501 XC Joure, the Netherlands.

**Controller** means the natural or legal person, public authority, agency or any other body which alone or jointly with others determines the purposes and means of the processing of personal data; where the purposes and means of processing are determined by EU or n State laws, the controller may be designated by those laws.

**Processor** means a natural or legal person, public authority, agency or any other body which processes personal data on behalf of a controller.

**Processing** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Personal Data** means any information relating to an identified or identifiable natural person (a "data subject"); an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

**Sensitive Data** means a special category personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life.

**Client** means a natural or legal person, Institute or any other body that uses this website to connect with each other.

**Institute or Institutional Client** means the provider of courses on the Platform (whether B2B or B2C).

**Service** means the online Booking, (facilitated) payment, reservation or other services as offered or enabled by CertScanner in respect to various products and services as from time to time made available by Institutes on the Platform.

**Platform** means the (mobile) website and app on which the Service is made available owned, controlled, managed, maintained, and/or hosted by CertScanner.

**Course** means the various courses that can be booked by you at an Institute.

**Course Reservation** means the booking, payment, booking, or reservation of a Course.

**Visitor** means a visitor to our website without having logged into an account.

## **DATA WE COLLECT AND HOW WE USE IT:**

### **THE DATA YOU PROVIDE TO US**

#### **Registration**

To create an account you need to provide data including your name, email address and/or mobile number, and a password. Your user account, allows you to save personal settings, review bookings or plan and manage future bookings. If you register as an Institute, you will also need to provide financial details to link your account to our payment service Provider

#### **Profile**

You have choices about the information on your profile, such as your education, work experience, skills, photo, city or area and reviews. Institutional Clients may choose to complete an Institute Profile that includes Personal Data of their employees. You don't have to provide additional information on your profile; however, profile information helps you to get more from our Services. It's your choice whether to include sensitive information

We do not require Clients to include Sensitive Data in their profile.

#### **Booking a course**

When you book a course, you are asked to provide your contact information. Depending on the Institute and course combination, we may also ask your telephone number, date of birth and payment information.

A Star ranking system can be applicable to our Services or Institutes and therefore you might be asked to provide a review.

## **Posting and Uploading**

We collect personal data from you when you provide, post or upload it to our Services, such as when you fill out a form, respond to a survey, or submit a certificate or review on our Services.

You don't have to post or upload personal data; though if you don't, it may limit your ability to grow and engage with your network over our Services.

For using our Services and to book courses we need a certain piece of information we will ask for. We may collect and process the following types of personal data about you:

Your name, preferred contact details and your payment information. Additional to this we also collect data from your computer, phone, tablet or other device you are using to access our services, such as: IP address, browser info and language settings.

Sometimes we receive information about you from others or automatically collect other information. Below you can find more detailed examples

### **THE DATA PROVIDED BY OTHERS:**

Others using our Services for your use, such as your employer (our Corporate Client), provide us with personal data about you and your eligibility to use the Services that they purchase for use by their workers. For example, we will get contact information for "Corporate Page" administrators and for authorising your use of our Services, such as our Course registration.

When your course is directly booked by a Corporate Client at CertScanner.com, some basic contact information is provided by the Corporate Client, they can also create an account to manage the bookings.

We consider it to be the responsibility of the Corporate Client to ensure that the data they have provided is correct and that you are aware of the processing of your data for this purpose and have understood and accepted how CertScanner.com uses their information (as described in this Privacy Notice).

### **THE DATA AUTOMATICALLY COLLECTED:**

the CS website and/or app collects certain information automatically and stores it in log files. The information may include internet protocol (IP) addresses, the region or general location where your computer or device is accessing the internet, browser type, operating system and other usage information about the use of the CS website, including a history of the pages you view. We use this information to help us design our site to better suit our users' needs. We may also use your IP address to help diagnose problems with our server and to administer our website, analyse trends, track visitor movements, and gather broad demographic information that assists us in identifying visitor preferences.

CS has a legitimate interest in understanding how Clients and Visitors use its website. This assists CS with providing more relevant products and services, with communicating value to our Institutional and corporate Clients, and with providing appropriate staffing to meet Client needs.

## **COOKIES AND SIMILAR TECHNOLOGIES:**

As further described in our Cookie Policy, we use cookies and similar technologies (e.g., pixels and ad tags) to collect data (e.g., device IDs) to recognise you and your device(s) on, off and across different services and devices where you have engaged with our Services. We also allow some others to use cookies as described in our Cookie Policy. You can always opt again out from our use of data from cookies and similar technologies that track your behaviour on the sites of others for ad targeting and other ad-related purposes

## **HOW WE FURTHER USE YOUR DATA**

Personal data may further be used in the following ways:

**To complete and administer your online booking** which is our course business as a compare and booking platform. This includes sending you communications in relation to confirmations, reminders and reviews.

When you link your CertScanner account to your social media account, personal data may be shared with us by that social media provider, but only when it's OK with you for them to do so. You always have the choice not to share this data.

**Customer Support:** We use data (which can include your communications) to investigate, respond to and resolve complaints and for Service issues (e.g., bugs).

**Account facilities:** CertScanner.com visitors can create a user account on our websites.

Allowing you to manage your account and personal settings and doing other useful things, we use the information you give us to administer your account. It can also allow you to see any reviews you have submitted. Corporate accounts can save contact details in their account facility and manage their business reservation.

**Communication:** We will contact you through email, mobile phone, notices posted on our websites or apps, messages to your profile inbox, and other ways through our Services, including text messages and push notifications. We will send you messages about the availability of our Services, security, or other Service-related issues. We also send messages about how to use our Services, network updates, reminders, course suggestions and promotional messages from us, our affiliates and our partners. You may change your communication preferences at any time. Please be aware that you cannot opt out of receiving service messages from us, including security and legal notices.

We may also enable communications between you and others through our Services for example to exchange information, requests, and comments about existing bookings.

If you have not finalised a booking online, we can contact you with a reminder to continue with your booking. The benefit of this additional services is to carry on with a booking without having to search again or fill in your reservation details.

This can also include information about your planning or getting the most efficient possibilities of your booking. We may also send you material related to upcoming relevant courses or a summary of previous courses you made. We take the freedom to inform you also about security alerts.

**Marketing activities:** Your information will be used for marketing activities. To be updated we might send you regular news of related products such as courses and special offers. Based on the individualised information we are able to provide these personalised special offers. The offers we think which we find interested to you can be booked directly on our website. When you participate in other promotional activities, relevant information will be used to administer these promotions.

**Recruitment and Selection:** based upon your certificate overview and Bookings we may communicate Contracting opportunities to you on behalf of selected Partners or Affiliates

## **DEVELOPMENT SERVICES & RESEARCH**

**Service Development:** We use data, including public feedback, to conduct research and development for our Services in order to provide you and others with a better, more intuitive and personalised experience, drive user growth and engagement on our Services

**Other Research:** We seek to create economic opportunity for Clients and to help them be more productive and successful. We use the personal data available to us to research social, economic and workplace trends, such as skills needed for these jobs and policies that help bridge the gap in various industries and geographic areas. In some cases, we work with trusted third parties to perform this research, under controls that are designed to protect your privacy. We publish or allow others to publish economic insights, presented as aggregated data rather than personal data.

**Surveys:** Polls and surveys are conducted by us and others through our Services. You are not obligated to respond to polls or surveys, and you have choices about the information you provide. You may opt-out of survey invitations.

**Market research:** Sometimes we ask our clients to take part in market research. Please see the information provided when you are invited to participate to understand what personal data is collected and how your personal data is used further.

**Client reviews:** After booking you may be invited to submit a review. This invite is to provide information about the relevant Institutes you have booked for. If you complete a review you agree that it can be published (as described in our Terms & Conditions) on our website or apps and/or used in our ranking system. This review will be visible for other Clients, Corporate Clients and institutes. The reason for this feature is to share information to others about the quality and experience of the booked Institute.

**Security and Investigations:** We use your data for security purposes or to prevent or investigate possible fraud or other violations of our User Agreement and/or attempts to harm our Clients, Visitors or others. This gives us the right to put bookings on hold or to stop until we have finished our assessment.

**Legal purposes:** We might need to use your information to process and resolve legal disputes for investigation and compliance reasons, to enforce the terms of use of the online booking service or to comply with lawful requests from law enforcement.

Providing your personal data is voluntary. However, we are only able to provide you with our service if certain personal data is collected. (f.i. if we do not collect your name and contact details we are not able to process your booking). We will implement suitable measures to safeguard your rights and freedoms, including the right to obtain human intervention, if we use automated means to process personal data which produces legal effects.

## **LEGAL BASIS:**

We will only collect and process personal data about you where we have a legal basis. Legal basis can include consent (where you have given consent), contract (where processing is necessary for the performance of a contract with you and/or delivery of our Services you requested) and our Legitimate Interests

Where we process data based on consent, we will ask for your explicit consent. You may decline or withdraw your consent at any time, but that will not affect the lawfulness of the processing of your personal data prior to such withdrawal. Where we rely on contract, you agree to the processing of personal data that is necessary for entering into or performance of your contract with us. We will rely on legitimate interests as a basis for data processing where the processing of your data is not overridden by your interests or fundamental rights and freedoms, where we rely on legitimate interests, you have the right to object. If you have any questions about the Legal basis upon which we collect and use your personal data, please contact our Data Protection Officer here [dpo@certscanner.com](mailto:dpo@certscanner.com)

## **SOCIAL MEDIA PLUGINS:**

ocial media may be integrated in various ways, which will involve us collecting some of your personal data or the social media provider receiving some of your information.

Partly to facilitate the use of online reservation services, promoting related courses, advertisement, improvement of our service and facilitate our service.

Social media plugins are integrated into our website.

If you are logged in to your social media account at the same time, your social media provider may relate this information to your social media account and possibly present your actions on your social media profile to be shared with others in your network.

The "like" button may activate the process to share certain information to the respective social media provider.

### Use of Twitter plugin

Functions of the Twitter service can be integrated into our website and app.

The Twitter plugin can be recognised by the Twitter logo on our website and/or app.

These features are offered by Twitter Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA. When you use Twitter and the "Retweet" function, the websites you visit are connected to your Twitter account and made known to other users. In doing so, data will also be transferred to Twitter. We would like to point out that, as the provider of these pages, we have no knowledge of the content of the data transmitted or how it will be used by Twitter. For more information on Twitter's privacy policy, please go to <https://twitter.com/privacy>.

Your privacy preferences with Twitter can be modified in your account settings at <https://twitter.com/account/settings>.

### Use of LinkedIn plugin

We use functions from the LinkedIn network. The service is provided by LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA.

The LinkedIn plugin can be recognised by the LinkedIn logo on our website and/or app.

Each time you access the news page and share a news post via LinkedIn, your browser establishes a direct connection to the LinkedIn servers. LinkedIn is informed that you have visited our web pages from your IP address. If you use the LinkedIn "Recommend" button and are logged into your LinkedIn account, it is possible for LinkedIn to associate your visit to our website to your user account. We would like to point out that, as the provider of these pages, we have no knowledge of the content of the data transmitted or how it will be used by LinkedIn.

More information can be found in the LinkedIn privacy policy at <https://www.linkedin.com/legal/privacy-policy>.

### Use of Facebook plugins

Our website uses plugins from the social network Facebook, Facebook Inc., USA.

The Facebook plugins can be recognised by the Facebook logo on our website and/or app. An overview of the Facebook plugins can be found here: [Link](#)

When you visit our website, the plugin establishes a direct connection between your browser and the Facebook server. Facebook receives the information that you have visited our website with your IP address. If you click on the Facebook "Like-Button" while you are logged into your Facebook account, you can link the contents of our website to your Facebook profile. As a result, Facebook can assign the visit to our website to your user account.

We point out that we as the provider of the website do not obtain knowledge of the content of the data transmitted and their use by Facebook. If you do not want Facebook to associate your visit to our website with your Facebook user account, please log out of your Facebook user account.

For more information, see the Facebook Privacy Policy

## **HOW WE SHARE INFORMATION:**

### **PROFILE AND BOOKINGS:**

If you are an Institute, your profile is visible to all Clients and Visitors.

To complete your course booking we transfer relevant booking details to the institute; this may include your name, contact details, payment details, any preferences and other specified information. In this case the Institute is an independent controller of your information. We advise you also to read the privacy notice of the Institute you are going to book if you wish to understand how they may process your personal data. We may also exchange information with them about you if there is any suspect of fraud and for prevention purposes. Unless payment is made during the booking process, we will forward your credit card details to the booked institute for further handling.

## **RELATED SERVICES**

We will share your personal data with our affiliates to provide and develop our Services. We may combine information internally across the different Services covered by this Privacy Policy to help our Services be more relevant and useful to you and others. For example, we may personalise your feed or course recommendations based on your learning history.

## **SERVICE PROVIDERS**

We use others to help us provide our Services (e.g., hosting, maintenance, analysis, audit, payments, fraud detection, marketing and development). They will have access to your information as reasonably necessary to perform these tasks on our behalf and are obligated not to disclose or use it for other purposes.

The process of payments, chargebacks or provide billing collection services will be fully outsourced to a third party Financial Services Provider (STRIPE), this Financial Services Provider is an independent controller, we advise you to read the Privacy Notice of STRIPE here <https://stripe.com/en-nl/privacy>).

If a chargeback is applicable and requested for your booking we need to share certain information, such as copy of your confirmation and IP address, but not limited to, to the payment service provider and the relevant financial institute to process this chargeback. This service may provide the ability to connect to the service provider's website. These websites may operate independently from us and may have their own privacy notices or policies, which we suggest you to review. If any linked website is not owned or controlled by us, we are not responsible for the content, any use of the website or the privacy practices of the operator thereof. Relevant financial institutes may be provided with information if CertScanner considers it strictly necessary for fraud detection and prevention purposes.

## **RECRUITMENT AND SELECTION**

We may share your contact details with selected Partners of Affiliated based upon your certificate overview and Bookings, before we share your details we will ask your consent>

## **AFFILIATED PARTNERS**

We intend to expand our services constantly and might move into working with global affiliated partners. These partners will also distribute, advertise or propagate our service.

## **COMPETENT AUTHORITIES**

If it is required by law or strictly necessary for prosecution, detection, prevention or criminal acts and fraud or legal obligation we will disclose personal data to law enforcement.

We may need to further disclose personal data to competent authorities to protect and defend our rights or properties, or the rights and properties of our business partners.

## **CHANGE OF CONTROL OR SALE**

We can also share your personal data as part of a sale, merger or change in control, or in preparation for any of these events. Any other entity which buys us or part of our business will have the right to continue to use your data, but only in the manner set out in this Privacy Policy unless you agree otherwise.

## **CROSS BORDER DATA TRANSFERS**

We process your data within the European Economic Area (EEA), if an Institute where you booked your course is processing your data outside of the EEA, we transfer your data on your request to the Institute as an independent Controller

## **SAFEGUARD YOUR PERSONAL DATA AND RETENTION:**

To prevent unauthorised access and misuse of personal data we use reasonable procedures. Safeguarding of personal data is executed by appropriate protection systems and procedures. The access and use of personal data is protected by technical and physical restrictions and covered through security procedures.

We will retain your personal data for as long as we deem it necessary to enable you to use our Services, to provide our Services to you (including maintaining the online user account (if created)), to comply with applicable laws, resolve disputes with any parties and otherwise as necessary to allow us to conduct our business, including to detect and prevent fraud or other illegal activities. All personal data we retain will be subject to this Privacy Notice

## **YOUR RIGHTS TO CONTROL YOUR PERSONAL DATA**

CS will observe your legal rights (and on instruction from the Client) with respect to personal data that relates to you. These rights include:

- The right to access personal data
- The right to obtain information about how personal data is stored
- The right to rectify or have inaccurate personal data corrected
- The right to have personal data securely removed or deleted when storage of the personal data is no longer necessary for the defined purposes
- The right to restrict processing of personal data in certain circumstances
- The right to opt out of personal data being shared with other Sites
- Right to object to your personal data being processed
- The right to data portability

Please note that CS will not disclose to you any information that may compromise the privacy of another individual unless required to do so by law.

If you have questions or concerns regarding the processing of your personal data or wish to exercise your rights under applicable law, please contact our Data Protection Officer in the first instance. You also have the right to raise any complaint with the relevant data protection supervisory authority in your country.

## **EXERCISING YOUR RIGHTS**

To exercise any of your rights listed above or if you have a complaint, please contact our Data Protection Officer [dpo@certscanner.com](mailto:dpo@certscanner.com)

## **YOUR DUTIES**

**Updating your personal data.** CS strives to maintain accurate, complete, and up-to-date personal data. We rely on you to help us maintain accurate personal data about you.

**Dependent Personal Data / Next of Kin** CS may collect personal data for emergency contacts. If you provide personal data about others, CS will rely on you (unless otherwise required by law) to communicate to those individuals that you are providing us with their personal data. CS will respect the privacy rights of those individuals whose personal data you provide us.

**Duty to report.** If you come into possession of personal data regarding another individual that is not strictly necessary for the performance of your duties, immediately contact our Data Protection Officer.

## **CONTACTS AND COMPLAINTS:**

In the event that you wish to make a complaint about how your personal data is being processed by CS or its partners, you have the right to complain to CS's Privacy Officer.

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you does not comply with the regulations.

The details for each of these contacts are:

### **CertScanner BV**

Madame Curieweg 2 – B1  
8501 XC Joure, The Netherlands  
mail: [dpo@certscanner.com](mailto:dpo@certscanner.com)

Supervisory Authority (for the Netherlands):

### **Autoriteit Persoonsgegevens**

Postbus 93374  
2509 AJ, Den Haag  
The Netherlands

## **REVISIONS:**

We reserve the right to update this Privacy Notice at any time, and any changes we make to our Privacy Notice will be posted on this page. If there are any material changes to the way we process personal data, the types of personal data we collect, or to any other aspect of this notice, we will seek to notify you as soon as possible. (v1.0 Aug 2020)