

Privacy Notice – Flow Concepts

(Last Updated: January 25, 2020)

This Privacy Notice describes how Flow Concepts collects and uses personal information collected through the Website and the Program Learning Platform (collectively called the 'Site'). It also describes the choices available to you regarding the use of, your access to, and how to update and correct your personal information.

This Privacy Notice sets out:

- The information we collect about you
- How we collect information about you
- How we use the information we collect
- Who we give your information to
- Control of your information
- Your access to your information and how long we keep it
- How we protect your information
- Where we store your information
- Use of Cookies
- Links to other websites
- Changes to this Privacy Policy
- Contact us

Please read the following carefully to understand our views and practices regarding your personal information and how we will treat it. By engaging with the Website and the Platform you acknowledge you have read and understood this Privacy Notice. Data protection laws require companies to describe their role and responsibility when handling personal information.

European Economic Area Data Subject Rights: If you are a resident of the European Economic Area, the following definitions apply to your data. When you access our Website and view information

about us and our technology, communicate with us, download whitepapers, and register for events etc, we are the *data controller*.

When you engage with the Platform because your employer has signed up to a Business plan or a Company Partnership Subscription (see below), then;

- your employer is the *data controller* with respect to the user information it provides to us. This information typically includes first name, last name, and business email address. Where your employer is the data controller in this way, we act as a *data processor* under data protection laws, meaning we use the information to provide a service to your employer.
- Flow Concepts is the *data controller* for information provided directly by you or as a result of interacting with the Platform, including assessment data, a secondary email address, additional profile details such as job title, personal website URL, a short bio, social platform handles, and demographic information such as your gender, year of birth, and your work industry. Please note that none of these additional profile details are required to utilize our Site, but we can offer you an enhanced experience if you provide it.

When you sign up as a user of the Platform as an Individual, Flow Concepts is the *data controller* for all personal information provided by that user and collected by the Platform as the user accesses and uses it.

1. The information we collect about you

We value your trust. In order to honor that trust, Flow Concepts adheres to ethical standards in gathering, using, and safeguarding any information you provide.

We collect and process the following personal information from you:

Information you give to us:

This is information about you that you give us directly when you interact with us. You may give it to us by filling out a form on our Site, corresponding with us by phone, e-mail, or at an in-person event. It includes information necessary to register for a subscription, pay for a subscription, or place an order for other services we provide. It also includes information shared when you participate in a discussion board, share on social media via our Site, enter a competition or promotion, submit a query, or report feedback about or a problem within our Site. When you create an account for our Platform, we require you to provide first name, last name, job title, company (if applicable) and email address. When you purchase a subscription, we will need payment and billing information, often including an address and credit card information.

Information we collect about you from your use of our Site

We will automatically collect information from you each time you visit our Site. This includes technical information, information about your visit, and information about your activity on our Site such as courses searched and viewed, page response times, download errors, length of visit to certain pages, page interaction information (such as scrolling, clicks, and mouseovers), methods to browse to and away from a page, and methods used to contact our sales and support teams. Technical information also includes the Internet protocol address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating systems, and device platform.

How we use the information we collect

Information you give to us:

Flow Concepts uses the personal information you provide in a manner that is consistent with this Privacy Notice. We use your personal information to provide our services on our Site, including services arising from any obligations set forth in a contract between you and us. These services include providing access to our course library, administration of your account, billing, and notifying you of changes to our service or your account. This data will also be used to allow you to participate in the interactive features of our Site or to provide you with information you may have requested from us, including whitepapers, access to webinars, or the like.

We also use your personal information together with other personally non-identifiable information to help us better understand our users, to personalize and improve your experience with our Site, and to improve the content and functionality of our Site. This may include providing information about our goods and services that we feel may interest you and enhance your interaction with our Site. We will communicate with you about these goods and services via email, social media channels, or on our Site. These communications may include newsletters, promotional emails, product updates, or market research requests. We will use your information for this purpose only if you have given your consent to receive marketing material from us at the point we collected your information, where required by law, or otherwise in our legitimate interests, provided these interests do not override your right to object to such communications.

Information we collect about you from your use of our Site:

We will use this information in our legitimate interests (where we have considered these are not overridden by your rights), to administer our Site, and for internal operations, including troubleshooting, data analysis, testing, research, and statistical survey purposes. We will also use this information to keep our Site safe and secure, for measuring the effectiveness of how we present content and how we market and advertise. We use Internet protocol addresses and non-personally identifiable information in our log files to analyze trends, to administer our Site, to track users' movements in and around our Site, and to gather demographic information about our user base as a whole. We also utilize unstructured machine learning technologies to understand user behaviors and to provide user-specific recommendations and other personalization of our Site experience.

Who we give your information to

We consider your personal information to be a vital part of our relationship with you and do not sell your personal information to third parties. There are, however, certain circumstances in which we may share your personal information with certain third parties, as follows:

Agents, Consultants and Related Third Parties:

We sometimes hire other companies to perform certain business-related functions, such as sending email on our behalf, payment processing, or conducting market research. We also share your email address with third parties, such as Facebook, LinkedIn, and Twitter in order to provide custom marketing materials for you on their platforms. When we employ another company to perform a function of this nature, we only provide them with the information that they need to perform their specific function. These companies are not permitted to use any personal information that we share with them for any other purpose aside from providing services to us.

Business Transfers:

As we develop our business, we might sell or buy businesses or assets. Your personal information may be transferred to a buyer or other successor in the event of a corporate sale, merger, reorganization, dissolution, or similar event in which personal information held by us about our Site users is among the assets transferred.

Legal Requirements:

In certain situations, Flow Concepts may be required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law

enforcement requirements. We reserve the right to disclose your personal information as required by law and when we believe that disclosure is necessary to protect our rights or to comply with a judicial proceeding, court order, or similar legal process served on us or our Site.

We will take reasonable steps to ensure that we only collect that personal information that is relevant for the purposes for which it is to be used. Furthermore, we will not process your personal information in a way that is incompatible with these purposes.

Control of your information

When you register, or otherwise give us personal information, we will not share that information with third parties without your permission, other than for the limited exceptions already listed. It will only be used for the purposes stated in this Privacy Policy. When Flow Concepts is acting as a ***data processor***, we will only process personal information in accordance with the instructions given by the ***data controller***. When Flow Concepts is acting as a data controller, we will act in accordance with your permission to offer you our services and as otherwise instructed by you. We will also give you the ability to opt out before we disclose your personal information to a third party or use your personal information for purposes that are fundamentally different than the purpose for which it was originally created.

If you would like to discontinue receiving communications from us, you may update your email preferences by using the “Unsubscribe” link found in emails we send to you or by contacting us at marketing@flowconcepts.me

Please note that we may not include the opt-out information in e-mails that are transactional in nature and are not marketing communications (i.e., e-mails concerning your order, the website’s Terms of Use, etc.). If you have questions or concerns regarding a transactional e-mail, please contact us.

Your access to your information and how long we keep it

Upon request, Flow Concepts will provide you with information about whether we hold, or process on behalf of a third party, any of your personal information. To request this information please contact us at marketing@flowconcepts.me

We will provide you with the means to ensure that your personal information is correct and current. If you have registered to use the Platform, we will provide a way for you to access and change your profile on our Platform. We will also allow you to completely delete your profile along with all personal information associated with that profile, although this option may significantly degrade your experience with our Platform. You may request deletion by accessing your profile and clicking on the link available there. Alternatively, you may contact us at marketing@flowconcepts.me

We will respond to your request within a reasonable timeframe. Requesting deletion of your account means your personal information is permanently deleted and cannot be retrieved.

How we protect your information

We store your personal information only on company-accessed platforms with limited access and use a variety of technologies and procedures intended to protect your personal information from loss, misuse, unauthorized access, disclosure, alteration and destruction. Nonetheless, no communication via the Internet can ever be 100% secure, and no security measures can ever be assured to be effective. Accordingly, you are advised to use caution and discretion when determining what personal information to disclose to us.

If you have any questions about security on our Site, contact us on marketing@flowconcepts.me

Your data protection rights

We would like to make sure that you are fully aware of all your data protection rights. Every user is entitled to the following:

The right to access: You have the right to request Flow Concepts for copies of your personal data.

The right to rectification: You have the right to request that Flow Concepts correct any information you believe is inaccurate. You also have the right to request our company to complete information you believe is incomplete.

The right to erasure: You have the right to request that Flow Concepts erase your personal data, under certain conditions.

The right to restrict processing: You have the right to request that Flow Concepts restrict the processing of your personal data, under certain conditions.

The right to object to processing: You have the right to object to Flow Concepts' processing of your personal data, under certain conditions.

The right to data portability: You have the right to request that Flow Concepts transfer the data that we have collected to another organization, or to you, under certain conditions.

If you make a request, we have one month (30 days) to respond to you. If you would like to exercise any of these rights, please contact us on marketing@flowconcepts.me

Where we store your information

The data that we collect from you is transferred to, and stored within our secure Customer Relationship Management system which is GDPR-compliant and has limited access.

Use of Cookies

Flow Concepts uses cookies or similar technologies to collect and store certain information. These typically involve pieces of information or code that a website transfers to or accesses from your computer hard drive or mobile device to store and sometimes track information about you. Cookies allow us to create a unique device ID, enable you to be remembered when using that computer or device to interact with websites and online services, and can be used to manage a range of features and content, including storing searches and presenting personalized content.

The Site uses cookies to distinguish you from other users of our Site. This helps us to provide you with a good and personalized user experience when you interact with our Site and also allows us to improve our Site.

Most web browsers automatically accept cookies, but if you prefer, you can change your browser to prevent that. We also give you information about how to disable cookies in the table below.

However, you may not be able to take full advantage of our Site if you do so.

A number of cookies we use last only while you are on our Site and expire when you close your browser or exit our Site Others are used to remember you when you return to our Site and will last for longer. We use these cookies on the basis that they are necessary for the performance of a contract with you, or because using them is in our legitimate interests (where we have considered that these are not overridden by your rights), and, in some cases, where required by law, where you have consented to their use.

We use the following types of cookies:

Strictly necessary cookies. These are cookies that are required for the operation of our website and under our terms with you. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.

Analytical/performance cookies. They allow us to recognize and count the number of visitors and to see how visitors move around our website when they are using it. This helps us for our legitimate interests of improving the way our website works, for example, by ensuring that users are finding what they are looking for easily.

Functionality cookies. These are used to recognize you when you return to our website. This enables us, subject to your choices and preferences, to personalize our content, greet you by name and remember your preferences (for example, your choice of language or region).

Targeting cookies. These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information subject to your choices and preferences to make our Site and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

Disabling cookies

The effect of disabling cookies depends on which cookies you disable but, in general, our Site may not operate properly if all cookies are switched off.

If you want to disable cookies on our Site, you need to change your website browser settings to reject cookies. How you can do this will depend on the browser you use. Further details on how to disable cookies for the most popular browsers are set out below:

For Microsoft Internet Explorer:

1. Choose the menu “tools” then “Internet Options”
2. Click on the “privacy” tab
3. Select the setting the appropriate setting

For Google Chrome:

1. Choose Settings> Advanced
2. Under “Privacy and security,” click “Content settings”.
3. Click “Cookies”

For Safari:

1. Choose Preferences > Privacy

2. Click on “Remove all Website Data”

For Mozilla Firefox:

1. Choose the menu “tools” then “Options”
2. Click on the icon “privacy”
3. Find the menu “cookie” and select the relevant options

For Opera 6.0 and further:

1. Choose the menu Files”> “Preferences”
2. Privacy

Links to other websites

This Privacy Notice applies only to our Site. The Site may contain links to other web sites not operated or controlled by us. The policies and procedures described here do not apply to web sites or other services that Flow Concepts does not operate or control. These links from our Site do not imply that we endorse or have reviewed those web sites or other services. We suggest contacting those services directly for information on their privacy policies.

Changes to this Privacy Notice

As our Site evolves, this Privacy Notice will need to evolve as well to cover new situations. To ensure that you are kept informed of changes, check this Privacy Notice periodically as we will update the date at the top of the document any time we make a change. If we make material changes to this Privacy Notice, we will post the revised policy on this page and will send a notice via email or our Site to all registered users of the Platform.

Your continued use of our Site after any such changes constitutes your acceptance of the new Privacy Notice. If you do not agree to abide by these or any future version of the Privacy Notice, you do not have permission to use or access (or continue to use or access) our Site.

How to Contact Us

If you have any questions or queries about this Privacy Notice, you can contact us via the following contact details.

Email: marketing@flowconcepts.me

Phone: 0047 45386902

Address: Øvre Slottsgate 3, 0157 Oslo, Norway

END OF PRIVACY NOTICE