

Hubro Education's Privacy Policy

This document describes how Hubro Education collects, stores and processes personal data across our services.

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What data do we collect?

Depending on which services you use and which forms you submit, we collect information regarding the following:

- Personal identification information
 - Full name
 - Email address
 - Phone number
 - IP last logged in with
 - Age bracket (over / under 16 years old)
 - Country
- Analytics
 - Page visits and behavior
- Product
 - Data related to activities in our simulation games
 - Access times, location and browser identifier

- Assessment of work done in the simulation

How do we collect your data?

Most of the data we collect will happen through forms you fill out during the registration process or through interactions with our platform.

- Submissions of forms on the website
- Registration on the platform
- Interaction with platform features such as answering exercises and evaluating answers
- Feedback surveys
- Direct email exchange with us
- Usage of the website via the use of cookies

How will we use your data?

The data collected will be exclusively used to deliver our services to players and instructors, and contact potential customers with our marketing material. We will never disclose, share, sell or publish your data to any external parties for any purpose.

The personal information you give us will also allow the simulation platform and instructor users in your organization to uniquely identify you.

If you are registering for a **participant user**, only you, your instructor and our support staff may view your personal information.

If you are registering as an **instructor user**, only you, other instructors in your organisation and our support staff may view your personal information.

Through the use of third-party analytics we will also analyze usage patterns to optimize our website for the best possible user experience and information flow.

How do we store your data?

All data is securely stored in our systems or in systems provided by third party storage providers. We and our providers comply with industry security standards, ensuring that your data is safely stored.

All data transfers happen over the encrypted protocol HTTPS between you and our sub-processors, and access is restricted through the user management system on the platform.

Providers used are listed on our website at <https://hubro.education/en/providers> along with details of the processing.

Third-countries

Some of your personal information may be stored in third-countries like the US through the use of our providers. This includes:

- Analytics information sent to Google (Google analytics /tag manager, USA) for visitor analytics
- Information sent by mail to Gmail (Google, USA) for general communications
- Payment information sent to Stripe (USA) for student payment and organization payments
- Contact information sent to Hubspot (USA) for marketing and communication.
- Personal information stored on Amazon's European servers for our platform

For each provider we have conducted a risk assessment and necessity assessment, and determined that our current set of providers offer the best security combined with the best product offerings we

need to operate effectively. For all our providers, we have a Data Protection Agreement in place, with EU's Standard Contractual Clauses included.

Marketing

Our company will send you relevant product information and updates for services you have expressed interest in, or have purchased. We will not send you marketing material from third parties.

You may opt out of receiving marketing communications from us at any time. Please contact us to opt out of receiving marketing communications, or click the unsubscribe link in our communications.

What are your data protection rights?

The right to access

You may at any time view all your personal information from the platform through your profile page on the platform. If you are an instructor, you may request the data we have stored in our CRM system.

The right to erasure

You may revoke your consent for storage at any time. Your personal information will then be wiped from our system completely. This makes our services unavailable to you.

If you have a **participant user**, your personal data will be wiped from our systems after one year of inactivity, as we assume you will no longer need access to the platform.

If you have an **instructor user**, your personal data will be wiped from our systems after three years of inactivity, as we assume your organisation no longer uses our systems.

The right to restrict processing

You have the right to restrict the processing of your personal data.

The right to object to processing

You have the right to object to how we process your data.

The right to data portability

You may at any time export all your personal information from the platform through your profile page on the platform. If you are an instructor, you may request the data we have stored in our CRM system.

What are cookies?

Cookies are pieces of text information that store information about visitor behavior and identification. We may collect information about your behavior on the website in the form of cookies.

How do we use cookies?

We use cookies for a wide range of purposes:

- Keeping you logged in to our services
- Understanding your preferences and behavior on our website and platform

How to manage cookies

You can instruct your browser to not store cookies, but some features of our website and platform may stop working.

How to contact us

We are happy to provide answers to any questions you may have about our privacy policy and data storage.

Email us at contact@hubroeducation.com, or through our website <https://hubro.education/en/contact>

How to contact the appropriate authority

Should you find our handling of your personal information not to be sufficient, you may contact Datatilsynet.

<https://www.datatilsynet.no/en/about-us/contact-us/how-to-complain-to-the-norwegian-dpa/>