Privacy Policy

General Information

Within this privacy policy ("**Policy**") you will find information regarding the processing of personal data that StudyHub Online s.r.o., with its registered office at Jindřišská 937/16, Nové Město, 11000 Praha 1, Tax ID 11649151, VAT No. CZ11649151, File No. C 352343, kept by the Municipal Court in Prague ("**We**" or "**Our Company**") processes as a data controller with you as a data subject ("**You**").

We are the operators of the Flowlance platform ("**App**") located on the <u>www.flowlance.com</u> website ("**Website**").

TL; DR version

- This document explains how and why We collect information from our users, how We use it and how You can access or change it. If You have any questions, please contact us at <u>info@flowlance.com</u>
- We process Your data if You (i) purchase services from us, (ii) register or login into the App, (iii) use the App, or (iv) visit Our Website.
- All data is stored in the EU.
- We use a range of analytical and marketing tools to properly operate the App and continually improve our services e.g. Google Analytics, Posthog and Rewardful.
- We will occasionally send you a newsletter to Your email address to keep you informed of updates and new features. You can unsubscribe at any time via the link provided in each email.

What personal information do We collect?

Personal information is information We may process about You, such as name, surname, e-mail address, information You upload into the App (e. g. photos, biography), profile photos and data provided to us by third parties if you access App through social networks (Google Account) support requests, system logs and similar types of data.

For various purposes, We process different categories of personal information about You. These categories are:

- o *identification and contact data* (e.g. name, surname, e-mail address);
- o *login information* (e.g. e-mail address);
- o *device information* (e. g. IP address, browser used);
- o *user account data* (e. g. data filled in by the users, the date of last login);
- o *user behavior data* (e. g. website behavior history, data about how users accessed the Website);
- o *Invoicing/bank details* (e. g. payment information, billing contact details, history of invoicing);
- o *communication details* (e. g. information the users provide to us in their communication with Us support request, complaints)

What personal data We process about You, for what purposes and for how long, depends on how and why You shared Your personal information with Us, or how We collected it. You may find more information about the data processing depending on the context in which the personal data is processed below.

Processing associated with the use of the App

Purpose	Scope of processed information	Legal title	Data Retention time
Provision of the App including related services and user support	 user account data login information 	Necessity for contract performance	Within 90 days of termination of Your account, up to a maximum of 2 years after Your last login
Sending newsletter	 user account data identification and contact data 	services by setting up a	Until you tell us that you no longer wish to receive a newsletter
Analysis of the user's behavior when using the App or our Website		A legitimate interest in	Until a legitimate objection to the processing, no later than 30 days after account termination

With whom do We share Your personal information?

Recipient	Reason for disclosure
Other users of the App	Necessary for performance of our contractual duties to Our customers and for the functionality of the App. Your photo, identification and contact data, along with details regarding Your offers and bio that You uploaded into the App, will be visible to other users.
	In order to analyze and improve Our App and Website, We use the services of web statistics providers and social network providers that provide cookies services.
Legal and tax advisors	Occasionally, We may need to consult legal or tax advisors for information about legal relationships with You. These are persons who are bound by the legal duty of confidentiality.
Payment gateway providers	Pay Gate provider which we use to facilitate payments for the App and related services We may provide You with.
Product Analysis Tools	In order to analyze the usage of the App and improve its features, we use analytics tools that process user interactions, app performance, and general behavioral patterns. These tools help us enhance user experience and ensure the App meets user needs.
Affiliate Marketing Platform	To manage our affiliate program, we use tools that monitor affiliate activities, calculate rewards, and process commissions. These tools require data related to affiliate accounts, referrals, and associated transactions.
Uptime Monitoring and Debugging Tools	To ensure the continuous functionality of the App, we use tools to monitor uptime and downtime, as well as to identify and resolve

technical issues. These tools process technical and system-related data to maintain the reliability of our services.

What are Your rights?

If You wish to exercise any of Your rights, please contact Us by e-mail at info@flowlance.com

o Right of withdrawal of consent

If We process Your personal data with Your consent, it is Your right to withdraw Your consent to the processing of personal data. This includes consent to receive a newsletter. You can withdraw Your consent here info@flowlance.com

If you do not wish to continue using the services of Our App, You can also cancel Your account by emailing us at info@flowlance.com

o Right of access

You have the right to access the personal data We process about You, as well as the information about what personal data We process about You, for what period of time, for what purposes We process it, who has access to it and whether We use it for automated decision making (or how this automated decision-making works).

o Right to rectify

If You find that We are processing incomplete or incorrect personal data about You, You have the right to have Your personal data corrected or, if required by the purpose of processing this personal data, to supplement it.

You can partially correct Your data Yourself, within Your user account settings.

o Right of deletion

You have the right to delete Your personal data, which Our Company stores and processes about Your person.

o Right to restrict processing

In cases where you feel that Your personal data processed by Our company is incorrect, You have the right to request that We limit the processing of Your personal data to the time strictly necessary to verify the accuracy of Your personal data and their possible correction.

o The right to object to the processing of Your personal data

You can object to how We process Your personal data by contacting us at Our email address info@flowlance.com

o Right of complaint

You can make a complaint by contacting the Office for Personal Data Protection, which is available on the site <u>https://www.uoou.cz/podatelna-uradu/os-1006</u>.

Automatized Processing and Profiling

As part of the processing, We are not conducting automated processing or profiling.

Technical safeguards

We protect Your personal information by applying the following safeguards when We process Your data:

- o Database containing all the information is in highly secured data center,
- o All passwords are encrypted,
- o Communication channels are encrypted with HTTPS protocol.

Cookies

Our Website uses so-called cookies. Cookies are small text files that are placed on Your computer or other device by websites that You visit. We use Cookies in order to make the Website function correctly or more

efficiently, as well as to gather information about Website visitors and their behavior. Cookies are not harmful to Your device or its software.

Each cookie has a different storage time on Your device. Some cookies will be deleted from Your device after You close the browser window (session cookies), others will remain on your device even after you quit browsing our Website (permanent cookies).

Cookies may be further divided into two categories – technical and secondary. Technical cookies allow You to navigate the Website and help Us to operate and maintain the Website. These cookies are automatically placed on Your computer or other device when You access the Website or perform any of the possible activities on the Website. Secondary cookies allow Us to analyze Your behavior on the Website or show You ads.

Information on which, how, for what purposes and to what extent We use cookies can be found under the Cookies tab.

Why do we use cookies?

Cookies allow Us to remember Your actions and preferences (e.g. language preferences, shopping cart contents) over a period of time, so You don't have to re-enter them each time You return to a website or navigate from one website to another.

At the same time, cookies help Us to understand what is interesting for You on our Website, whether it is well arranged for You, and what You are looking for. We therefore use cookies to improve the user experience. Cookies may also record additional information, such as the number of visitors to our Site, as well as which subpages of Our Website You visit most frequently.

What cookies do we use?

We are legally allowed to store technical cookies (those that are necessary for the operation of the Website or App) on Your device even without Your consent. For other types of cookies, Your consent is required. You can therefore accept or reject secondary cookies within the cookies bar located at the bottom of the Website when it is launched. You can revoke Your consent and You can change Your cookie settings at any time by setting Your preferences using the Cookies tab or by emailing us at info@flowlance.com.

Managing or removing cookies

Although most browsers have basic settings that accept cookies, their settings allow You to delete or remove cookies.

Find out how to manage cookies on popular browsers:

- o <u>Google Chrome</u>
- o <u>Microsoft Edge</u>
- o <u>Mozilla Firefox</u>
- o <u>Microsoft Internet Explorer</u>
- o <u>Opera</u>
- o <u>Apple Safari</u>

Changes to the Policy

This Policy may be changed to reflect best practices and legal requirements for personal data protection. The current version will always be listed on Our website and if the changes are significant, We will also inform You by e-mail.

Personal Data Protection Officer

We do not have a personal data protection officer and We are not legally obliged to appoint one.

This Policy shall take effect on 7 January 2025.