# **Privacy Policy**

**Updated February 2025** 

#### Introduction

At FutureProofing Companies, which includes the legal entities F4L-NL BV and Best of Breed BV, operating under the brand names Finance4Learning, Access2Europe, NewLanguage Training et al, we prioritise your privacy and are committed to protecting your personal data. We strive to comply with the General Data Protection Regulation (GDPR), relevant Dutch privacy laws, and, where applicable, the European Union's AI Act. Additionally, when working with partners, typically referred to as 'A FutureProofing Company Partner,' their respective privacy policies may apply where relevant.

#### Definitions

- Personal Data: Any information relating to an identified or identifiable individual ('data subject').
- Processing: Any operation performed on personal data, such as collection, storage, use, or deletion.
- Data Controller: The entity responsible for determining the purposes and means of processing personal data.
- Data Processor: A third party that processes personal data on behalf of the data controller.

#### Data Controller Contact Information

Depending on the specific services used, the data controller for personal data will be the legal entity mentioned in your agreement with us or the entity associated with the brand or webpage you interact with. Please refer to the relevant webpage associated with the service or brand you interact with for up-to-date contact details.

### Data We Collect

We work with various technologies provided by companies such as HubSpot, Google, AI partners, financial software providers, etc. These tools support service delivery, website functionality, marketing automation, and analytics. We collect various types of personal data, which may include:

- Contact and Identification Data: Collected through web forms, event registrations, direct communications, and service interactions.
- Financial Data: Collected during financial applications and service usage.

- Application and Service Data: Information submitted when applying for our financial services.
- Technical Data: Data collected through interactions with our websites.
- Communication Data: Messages and correspondence sent via email or contact forms.
- Special Categories of Data: We do not intentionally process special categories of personal data unless legally required.

### Purposes and Legal Bases for Processing

- To Perform Contracts: Processing necessary to provide our services, including loan application approvals, customer support, and financial solutions.
- To Comply with Legal Obligations: Processing required by financial regulations, tax laws, and anti-fraud measures.
- For Legitimate Interests: Processing to improve services, secure platforms, prevent fraud, and conduct analytics.
- With Your Consent: For marketing communications and surveys, where explicit consent is provided.

## Automated Decision-Making and Al Systems

We do not currently use automated decision-making or profiling that significantly affects data subjects. If implemented in the future, we will provide full transparency.

### Cookies and Similar Technologies

We use cookies to enhance your experience on our websites, including:

- Essential Cookies: Necessary for website functionality.
- Functionality Cookies: Enhance performance by remembering your preferences.
- Analytics Cookies: Help us understand how users interact with our site.
- Advertising Cookies: Enable personalised advertising.

# Data Sharing and Transfers

We may share your data with:

- Service Providers: Companies providing IT services and payment processing.
- Legal Authorities: When required by law.

- International Transfers: We use safeguards such as EU Standard Contractual Clauses (SCCs).
- Partner Organisations: Partner privacy policies may apply.

### Data Security

We implement security measures including data encryption, access controls, and regular audits.

#### Data Retention

We We retain personal data only as long as necessary to fulfill our purposes or comply with legal obligations. Examples include:

- Contractual Data: Retained for the service agreement duration.
- Financial Records:\*\* Retained for seven years to comply with regulations.

### Your Rights Under GDPR

As a data subject, you have rights including access, rectification, erasure, restriction, portability, and objection. You may also withdraw consent at any time.

### Complaints

You have the right to lodge complaints with the Dutch Data Protection Authority.

# · Policy Updates

We may update this policy to reflect changes in our services or legal obligations. Updates will be posted on our website.