

123 Sonography GmbH Privacy Notice



What this section elaborates on: who We are, basic definitions used throughout the Notice, when this Privacy Notice is triggered, and data processing takes place

This Privacy Notice (hereinafter - the "Privacy Notice") is issued by 123 Sonography GmbH, entity registration number: FN 521171d, located at: Schwindgasse 7/1, 1040 Vienna, Austria and set up under the laws of Austria – the "**Company**" or "**We**", "**Our**", "**Us**".

This Privacy Notice is addressed to:

- 1) employees, contractors, groupmates and the like (the "**Users**") of Our business customers (the "**Partners**");
- 2) persons representing the Partners (such as the "**Administrators**", "**Signatories**", "**Representatives**" and other authorized individuals);
- 3) individual customers (the "**Customers**"); and
- 4) website visitors (the "**Website Visitors**")

in relation to the processing of the Data Subjects' personal data received in the course of:

- (1) requesting usage and using the Company's online platform (the "**Services**");
- (2) accessing and browsing the Company's website at: <https://www.123sonography.com> (the "**Website**"); or

(3) any other communications, requests, negotiations, discussions, meetings directly or indirectly concerning the Services and in any other manner and as part of other activities and services later offered, published, developed, reduced to practice, and released by the Company.

Important terms used in this Privacy Notice are:

“General Data Protection Regulation” or “GDPR” mean the Regulation of the European Parliament and of the Council (EU) 2016/679 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation).

“Personal data”, “processing”, “controller”, “processor”, “pseudonymisation”, “profiling”, “restriction of processing”, “consent” and other concepts if used in the Privacy Notice carry the meanings laid down in the GDPR.

“Partner”, “Users”, “Administrators”, “Signatories”, “Representatives”, “Customers” may additionally be construed and interpreted in the Terms of Service published on the Website.

“Website Visitor” are all visitors of the Website, Users, Administrators, Signatories, Representatives and Customers.



What this section elaborates on: We are committed to forging transparent practices in the data protection domain. With this in mind and for Your convenience of reading the Privacy Notice We are specifying categories (groups) of Our processors (vendors) which We are referring to in the Data Roadmaps below. We believe these Data Roadmaps will come in handy for comprehending Our data processing flows (records) and forming a structured and complex grasp of Your position in every data processing event without diving into the Privacy Notice in full

Below is the categories (groups) of Our vendors We are referring to throughout the Privacy Notice:

- 1) **IT services and technical maintenance vendors;**
- 2) **Video hosting vendors;**
- 3) **Project and team management, content creation vendors;**
- 4) **Invoice processing vendors;**
- 5) **Payment-related vendors;**
- 6) **Communication vendors;**
- 7) **Analytics, statistics, performance, marketing vendors.**

You can read about the data being collected and processed in the next sections below the Data Roadmaps

[The Data Roadmaps commence from the next page](#)

Data Roadmaps

Roadmap No. 1



Website Visitor's Data

the Website Visitor may be either a random visitor, User, Administrator, Signatory, Representative or a Customer

Type of data	Legal basis	Purpose	Recipients	Receiving Countries; Transfer	Storage
Data received automatically: IP address, geolocation, session id, device operating system, resolution, browser (useragent), preferred language, and other data which may be retrieved and returned by Our systems	Our legitimate interests	(1) To display the webpage properly in the Website Visitor's browser; (2) prevent malicious actions of Website Visitors, attacks, hacking, fraud, data scraping, infection of the Website with viruses and the like	Depending on Your actions on the Website, this data may be received by: (1) IT services and technical maintenance vendors; (2) video hosting vendors; (3) project and team management, content creation vendors; (4) communication vendors; (5) analytics, statistics, performance, marketing vendors	Austria, Australia, Sweden, USA (in reliance on permitted transfer mechanisms)	As long as the data is necessary for a relevant purpose, till deleted by Us, till the limitation period expires or as long as legitimate interests are relied on
Data received through cookies and similar technologies installation and use	(1) Consent obtained via the cookie consent tool; (2) Our legitimate interests in the event of Google Analytics	(1) Measurement of website performance and visits; (2) running of the advertising campaigns by means of	(1) some IT services and technical maintenance vendors; (2) possibly, video hosting vendors; (3) possibly, project and team management, content creation vendors;	Austria, Sweden, USA and, possibly, other third countries (in reliance on permitted transfer mechanisms)	26 months in the event of Google Analytics and Google AdWords; in other cases –

	and Google AdWords; (3) possibly, legitimate interests of Our vendors for their statistics and performance	a) Google AdWords and Google Analytics in conjunction; b) Facebook pixel; c) Instagram; and d) LinkedIn.	(4) possibly, communication vendors; (5) analytics, statistics, performance, marketing vendors; (6) Our founders, directors, management, consultants, advisors, contractors		until deleted manually or as long as they are required by the respective vendors
Full name, contact details, subject of the request and other information submitted through the Help center or by other means	Depending on a situation: (1) necessity to enter into a contract; (2) contract performance; (3) Our legitimate Interests in identifying You	(1) To reply to requests, communicate; (2) arrange pre-contractual negotiations and communication; (3) perform Our agreements concluded with You; (4) prevent malicious actions	Depending on the nature of Your request or query: (1) IT services and technical maintenance vendors; (2) communication vendors; (3) possibly, project and team management, content creation vendors; (4) Our founders, directors, management, consultants, advisors, contractors	Austria, Sweden, USA and, possibly, other third countries (in reliance on permitted transfer mechanisms)	As long as the data is necessary for the purpose or till the limitation period expires
Full name, email address	(1) necessity to enter into a contract; (2) contract performance; (3) Our legitimate Interests in identifying You	To sign up for Our newsletters	(1) IT services and technical maintenance vendors; (2) possibly, project and team management, content creation vendors; (3) communication vendors; (4) Our founders, directors, management, consultants, advisors, contractors	Austria, Sweden, USA and, possibly, other third countries (in reliance on permitted transfer mechanisms)	As long as the data is necessary for the purpose or till the limitation period expires
Email address	(1) necessity to enter into a contract; (2) contract performance; (3) Our legitimate Interests in identifying You and	To access free lectures published on the Website and Platform	(1) IT services and technical maintenance vendors; (2) probably, video hosting vendors; (3) possibly, project and team management, content creation vendors;	Austria, Sweden, USA and, possibly, other third countries (in reliance on permitted transfer mechanisms)	As long as the data is necessary for the purpose or till the limitation period expires

	legitimate interests of Our vendors for their statistics and performance purposes		(4) analytics, statistics, performance, marketing vendors – for their statistics and performance purposes; (5) Our founders, directors, management, consultants, advisors, contractors		
Information received via Our Facebook page and Facebook social media features (comments, shares, reactions)	(1) Our legitimate Interests in identifying You and legitimate interests of Our vendors for their statistics and performance purposes	To view content, comment on the articles and posts on Our Facebook page, share and react to the content published on Our Facebook page	(1) Meta Platforms Ireland Ltd. (2) possibly, some of the video hosting vendors if We publish videos on Our Facebook page; (3) possibly, project and team management, content creation vendors; (4) some of the analytics, statistics, performance, marketing vendors; (5) Our founders, directors, management, consultants, advisors, contractors	Austria, Sweden, USA and, possibly, other third countries (in reliance on permitted transfer mechanisms)	As long as your account is open and according to the Facebook Inc. policies (Meta Platforms)
Information received via Our Instagram page and Instagram social media features (comments, shares, reactions)	(1) Our legitimate Interests in identifying You and legitimate interests of Our vendors for their statistics and performance purposes	To view content, comment on the articles and posts on Our Instagram page, share and react to the content published on Instagram page	(1) Meta Platforms Ireland Ltd.; (2) possibly, some of the video hosting vendors if We publish videos on Our Instagram page; (3) possibly, project and team management, content creation vendors; (4) some of the analytics, statistics, performance, marketing vendors; (5) Our founders, directors, management, consultants, advisors, contractors	Austria, Sweden, USA and, possibly, other third countries (in reliance on permitted transfer mechanisms)	As long as your account is open and according to the Instagram Inc. (Meta Platforms) policies
Information received via Our Twitter page and Twitter social media	(1) Our legitimate Interests in identifying You and legitimate interests	To view content, comment on the articles and posts on Our Twitter page, share and react to	(1) Twitter Inc.; (2) possibly, some of the video hosting vendors if Our videos are published on Our Twitter page;	Austria, Sweden, USA and, possibly, other third countries (in reliance on permitted	As long as your account is open and according

features (comments, shares, reactions)	of Our vendors for their statistics and performance purposes	the content published on Our Twitter page	(3) possibly, project and team management, content creation vendors; (4) Our founders, directors, management, consultants, advisors, contractors	transfer mechanisms)	to the Twitter Inc. policies
Information received via Our YouTube channel and YouTube social media features (comments, shares, reactions)	(1) Our legitimate Interests in identifying You and legitimate interests of Our vendors for their statistics and performance purposes	To view content, comment on the videos on Our YouTube channel, share and react to the content published on Our YouTube channel	(1) YouTube (featured by Google LLC); (2) possibly, project and team management, content creation vendors; (3) Our founders, directors, management, consultants, advisors, contractors	Austria, Sweden, USA and, possibly, other third countries (in reliance on permitted transfer mechanisms)	As long as your account is open and according to YouTube (Google LLC) policies
Information received via Our LinkedIn Page (comments, shares, reactions)	(1) Our legitimate Interests in identifying You and legitimate interests of Our vendors for their statistics and performance purposes	To view content, comment on the content on Our LinkedIn Page, share and react to the content published on Our LinkedIn Page	(1) LinkedIn Ireland Unlimited Company; (2) possibly, project and team management, content creation vendors; (3) Our founders, directors, management, consultants, advisors, contractors	Austria, Sweden, USA and, possibly, other third countries (in reliance on permitted transfer mechanisms)	As long as your account is open and according to LinkedIn Inc. policies
Cookie consent tool provided by Cybot A/S	(1) Our legitimate interests and GDPR requirement to store Your cookie choice state	Storage of the user's cookie consent choice for the Company's domain	(1) Cybot A/S; (2) Our founders, directors, management, consultants, advisors, contractors	Ireland, Dublin	1 year

Roadmap No. 2



Data in Business-to-Customer Event where You are Our Individual Customer

Type of data	Legal basis	Purpose	Recipients	Receiving Countries; Transfer	Storage
Email, username, password, full name, country, profession, qualifications and licenses held	(1) Necessity to enter into a contract; (2) contract performance; (3) legitimate interests in some instances	(1) To create an electronic user cabinet for You, address You, evaluate your eligibility to take courses relevant to your profession, issue course completion certificates in Your name, accept and serve Your requests, answer Your questions etc. (provide the Services), resolve possible misunderstandings and complaints	(1) IT services and technical maintenance vendors; (2) possibly, video hosting vendors; (3) project and team management, content creation vendors; (4) communication vendors (if some of the given data is used in communication with You); (5) analytics, statistics, performance, marketing vendors (if some of Our vendors collect statistics and performance of their products); (6) Our founders, directors, management, consultants, advisors, contractors	Austria, Sweden, USA and, possibly, other third countries (in reliance on permitted transfer mechanisms)	As long as the data is necessary for the respective purposes, according to legal requirements and limitation period
Your account and payment details, billing information, purchase history	(1) Necessity to enter into a contract; (2) contract performance;	(1) To prepare and issue invoices; (2) process payments; (3) resolve payment requests, claims,	(1) possibly, IT services and technical maintenance vendors; (2) invoice processing vendors; (3) payment-related vendors;	Austria, Sweden, USA and, possibly, other third countries (in reliance on	As long as the data is necessary for the respective purposes, according to legal

	(3) legitimate interests in some instances	differences and disputes (if any)	(4) project and team management vendors (if some of the given data is used and processed by the respective vendors in the course of Our operations) (5) some communication vendors (if some of the given data is used in communication with You); (6) Our founders, directors, management, consultants, advisors, contractors	permitted transfer mechanisms)	requirements and limitation period
Information created as a result of using Our Platform and Services: (1) courses purchased and taken by You; (2) course progress and completion/non-completion status; (3) course grades and scores; (4) certificates issued in Your name; (5) Your overall purchase and course history; (6) courses and materials You viewed for free on Our Platform; (7) history of receiving newsletters by You; and other data which may be obtained by Us or produced in the course of using Our Services and Platform (8) your search prompts in SonoAssistant	(1) Necessity to enter into a contract; (2) contract performance; (3) legitimate interests in some instances	(1) To serve You; (2) remember Your preferences, resolve requests and complaints; (3) create aggregated/anonymized statistical data (4) improve our services and develop new products, features and technologies. For example, we may use your search prompts in SonoAssistant to improve the underlying AI model's accuracy and relevance.	(1) IT services and technical maintenance vendors; (2) video hosting vendors; (3) invoice processing vendors; (4) payment-related vendors; (5) project and team management vendors (if some of the given data is used and processed by the respective vendors in the course of Our operations) (6) some communication vendors (if some of the given data is used in communication with You); (7) analytics, statistics, performance, marketing vendors; (8) Our founders, directors, management, consultants, advisors, contractors	Austria, Sweden, USA and, possibly, other third countries (in reliance on permitted transfer mechanisms)	As long as the data is necessary for the respective purposes, according to legal requirements and limitation period

Email address	Legitimate interests or consent (depending on whether you are an existing customer or a new one)	To display the third-party advertisement banner added to the course-related newsletter	(1) IT services and technical maintenance vendors; (2) analytics, statistics, performance, marketing vendors and other third vendors not directly specified in this category (You can exercise your objection rights by unsubscribing from this banner outright in the newsletter); (3) Our founders, directors, management, consultants, advisors, contractors	Austria, Sweden, USA and, possibly, other third countries (in reliance on permitted transfer mechanisms)	Until you unsubscribe from this third-party advertisement banner or until you withdraw your consent
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Roadmap No. 3



Data in Business-to-Business Event



Please note that You can consult this Roadmap for Your information, however in this scenario We may not be responsible to You directly regarding Your personal data protection rights, except where We are Your data controller. In other cases, You should approach your data controller instead, but You can consult this Roadmap for Your information.

Type of data	Legal basis	Purpose	Recipients	Receiving Countries; Transfer	Storage
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<p>Data relating to the Partner's Administrator:</p> <p>(1) full name, credentials, contact details; (2) rights and access granted to a particular Administrator; (3) deals, contracts, courses and Users assigned to and overseen by a particular Administrator</p>	<p>Determined by Your data controller.</p> <p>The legal basis may be: (1) contract performance; (2) Your consent; (3) or other legal ground</p>	<p>Determined by Your data controller</p> <p>From Our perspective, the purpose is to provide Your controller with a technical possibility to monitor the course progress of its employees, consultants etc. according to the arrangements between You and Your data controller.</p>	<p>Upon Your data controller's Instruction and authorization:</p> <p>(1) IT services and technical maintenance vendors; (2) project and team management vendors (if some of the given data is used and processed by the respective vendors in the course of Our operations); (3) some communication vendors (if some of the given data is used in communication with You); (4) Our founders, directors, management, consultants, advisors, contractors</p>	<p>Austria, Sweden, USA and, possibly, other third countries (in reliance on permitted transfer mechanisms)</p>	<p>Determined by Your data controller.</p> <p>However, from Our perspective, the storage criteria are determined by a period for which the data is necessary for the respective purposes, according to legal requirements and limitation period</p>
<p>Data relating to the Partner's Representative:</p> <p>(1) information received automatically by Our systems; (2) full name, contact details; (3) rights and authorizations granted to a particular Representative, their role; (4) subject of the Representative's requests, any other information obtained during negotiations with a particular Representative etc.</p>	<p>(1) Necessity to enter into a contract; (2) contract performance; (3) Our legitimate interests in identifying You and verifying Your identity</p>	<p>(1) To respond to Your requests; (2) hold negotiations and meetings; (3) execute agreements with the Partner; (4) perform agreements executed with Our Partners; (5) resolve any differences, misunderstandings, complaints, disputes or the like</p>	<p>(1) IT services and technical maintenance vendors; (2) invoice processing vendors; (3) possibly, payment-related vendors; (4) project and team management vendors (if some of the given data is used and processed by the respective vendors in the course of Our operations); (5) communication vendors; (6) Our founders, directors, management, consultants, advisors, contractors</p>	<p>Austria, Sweden, USA and, possibly, other third countries (in reliance on permitted transfer mechanisms)</p>	<p>The storage criteria are determined by a period for which the data is necessary for the respective purposes, according to legal requirements and limitation period</p>
<p>Data relating to the Partner's Signatory:</p>	<p>(1) Necessity to enter into a contract;</p>	<p>(1) To respond to Your requests;</p>	<p>(1) IT services and technical maintenance vendors; (2) invoice processing vendors;</p>	<p>Austria, Sweden, USA and, possibly, other third countries</p>	<p>The storage criteria are determined by a</p>

<p>(1) information received automatically by Our systems;</p> <p>(2) full name, contact details;</p> <p>(3) rights and authorizations granted to a particular Signatory, their role;</p> <p>(4) contracts signed by a particular Signatory;</p> <p>(5) any other information obtained during negotiations with a particular Signatory etc.</p>	<p>(2) contract performance;</p> <p>(3) Our legitimate interests in identifying You and verifying Your identity</p>	<p>(2) hold negotiations and meetings;</p> <p>(3) execute agreements with the Partner;</p> <p>(4) perform agreements executed with Our Partners;</p> <p>(5) resolve any differences, misunderstandings, complaints, disputes or the like</p>	<p>(3) probably, payment-related vendors;</p> <p>(4) project and team management vendors (if some of the given data is used and processed by the respective vendors in the course of Our operations);</p> <p>(5) communication vendors;</p> <p>(6) Our founders, directors, management, consultants, advisors, contractors</p>	<p>(in reliance on permitted transfer mechanisms)</p>	<p>period for which the data is necessary for the respective purposes, according to legal requirements and limitation period</p>
<p>Data relating to the User:</p> <p>All types of data specified in the Data Roadmap No. 2</p>	<p>Determined by Your data controller.</p> <p>The legal basis may be:</p> <p>(1) contract performance;</p> <p>(2) Your consent;</p> <p>(3) or other legal ground</p>	<p>Determined by Your data controller.</p> <p>From Our perspective, the purpose is to render the Services to your data controller, enable access to Our Platform</p>	<p>1) IT services and technical maintenance vendors;</p> <p>(2) video hosting vendors;</p> <p>(3) invoice processing vendors;</p> <p>(4) payment-related vendors;</p> <p>(5) project and team management vendors (if some of the given data is used and processed by the respective vendors in the course of Our operations);</p> <p>(6) some communication vendors (if some of the given data is used in communication with You);</p> <p>(7) analytics, statistics, performance, marketing vendors (if some of Our vendors collect statistics and performance of their products);</p> <p>(8) Our founders, directors, management, consultants, advisors, contractors;</p> <p>(9) Administrator(s).</p>	<p>Austria, Sweden, USA and, possibly, other third countries (in reliance on permitted transfer mechanisms)</p>	<p>The storage criteria are determined by a period for which the data is necessary for the respective purposes, according to legal requirements and limitation period</p>

Email address	Legitimate interest or consent (depending on circumstances)	To display the third-party advertisement banner added to the course-related newsletter	(1) IT services and technical maintenance vendors; (2) analytics, statistics, performance, marketing vendors and other third vendors not directly specified in this category (You can exercise your objection rights by unsubscribing from this banner outright in the newsletter); (3) Our founders, directors, management, consultants, advisors, contractors	Austria, Sweden, USA and, possibly, other third countries (in reliance on permitted transfer mechanisms)	Until you unsubscribe from this third-party advertisement banner or until you withdraw your consent
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Our Controller-Processor Status and Your User Category



What this section elaborates on: We provide You with explanations about Your standing amongst the categories of users whose automatic data are processed through the Website



Note: When accessing and browsing the Website, We can treat You in different legal capacities falling into the categories of:

- 1) the Website Visitor;
- 2) the Customer;
- 3) the Administrator;
- 4) the Representative;
- 5) the Signatory; and
- 6) the User.

The foregoing categories arise out of Our data processing activities incorporated into Our commercial pipeline and business cycles, as well as into the client intake and onboarding, service provision and control and after-service steps.

You may simultaneously act both as the Website Visitor and Customer, or as the Administrator, Representative, Signatory or the User of Our Partner. In such event, We likewise will be acting both as a controller and a processor of Your Personal data. Our controllership legal status extends to the cases where You act as the Website Visitor, Customer, Representative and Signatory. At the same time, We act as a processor only with regard to Users and Administrators. Therefore, We will have different personal data protection obligations towards You depending on whether We act as a controller or processor. The Data Roadmaps above shall also serve as a basis for determining Our controller-processor standing.



We don't intentionally collect and process the Personal data of individuals who didn't attain the legal age of majority in their home countries or countries of their location at the moment of accessing the Website). If You happen to be aware of such events, please report them to Us

When You access and use the Website, We automatically receive Your IP address, device type and operating system, screen resolution, preferred language, time stamp, referral source (a webpage/site from where you were redirected to the Website) and other online identifiers which can be transferred via HTTP requests, including cookies.

Processing of the automatically received data is necessary for You to access and use the Website. This information is required for accessing and browsing the Website.

The legal basis for receiving and processing this data is Our legitimate interests and those of Our vendors. We process the aforementioned data for the purpose of preventing cyberattacks, fraud, spotting potentially malicious and suspicious behavior and keeping Our Website and software systems healthy and secure.

Primary Personal Data Necessary to Render the Services and Communicate with You



What this section elaborates on: We provide You with clarifications on what personal data can be processed about You in pre-contractual and contractual settings



Note: When We start interacting with You by way of conducting correspondence with You and replying to Your general questions, or by means of making calls and meetings through Our communication vendors, or holding kick-off meetings and initial negotiations to figure out whether Our Services match Your necessities and potential aims, or by way of carrying out other similar steps and actions, We are in the pre-contractual business stages for the purpose of the data processing regulations.

In the pre-contractual business settings, as the Data Subject, You may have the status of:

- 1) the prospective Customer;
- 2) the Representative or Signatory of the prospective Partner; or
- 3) the prospective User.

In the events mentioned above, We may process different types of data about You, such as:

- a) Your full identification information (full name, country of residence, current location) is collected and processed by Us for verifying Your identity and lawfulness of Your intentions and for addressing You properly, indicate Your name correctly on prospective course completion certificates, invoices, address You in Our communications, documents, newsletters and in other necessary correspondence. If You act as the Representative or Signatory of a prospective Partner, We also collect and process Your full identification information, as well as Your authorizations, powers and We may ask You to provide the respective documents evidencing such authorizations and rights to represent a particular Partner in a contemplated transaction. If You are acting as a User, We may also request all data of the person who will pay invoices for Your prospective attendance of the course(s);
- b) Your profession and all qualifications held by You at the time of approaching Us, all professional licenses and admissions obtained by You and their details (country of issue, number and date of issue etc.), Your professional certification goals and expected results after completion of a requested course, the score which is being sought by You in a particular course in order to be certified, Your country and place of work (Your employer), and other details may be required by Us at the pre-contractual stage for assessment of Your eligibility to take a particular course or courses sought by You and whether a completion of the course(s) requested will enable You to upgrade Your professional level and facilitate Your qualification standing and opportunities in the job based on Our previous customer service history and customer orders. If You act as the Representative or Signatory of the prospective Partner, We also gather the same information as specified above regarding employees, contractors, consultants, advisors and other individuals who will participate in and attend the course(s) You are ordering from Us;
- c) Your payment details for their introduction into the agreements and invoices, for validating and verifying Your payment method and its issuer, as well as the country of its issue;
- d) other types of data if they are necessary or required for us to verify Your identity and Your prospective order.

In the contractual business stage, as the Data Subject, You may have the status of:

- 1) the Customer;

- 2) the Representative or Signatory of the Partner;
- 3) the Administrator; or
- 4) the User.

In the foregoing cases, We may collect and process:

- a) the data pertaining to Your electronic cabinet being featured on Our Website. In order to get access to Our pre-paid course material, We create an electronic cabinet for You. For the foregoing purpose, if You are the Customer or User, We ask You to provide Your first and last name, country, profession, and email. We generate the initial password and username which You will be able to change later through Your user cabinet. You also will be required to fill out Your date of birth, ABIM number and confirm/edit spelling of Your name on course certificates and diplomas. Prior to making a purchase of course licenses via the Platform, the Customer and/or User must provide their payment method, billing address, tax identification/VAT numbers, depending on whether the User or their employer are going to buy the course license.
- b) If You act as the Representative or Signatory of the Partner, We also collect and process Your full identification information, as well as Your authorizations, powers and We may ask You to provide the respective documents evidencing such authorizations and rights to represent a particular Partner in a transaction at issue;
- c) You may, as well, act as the Administrator of Our Partner. In the business-to-business setting, We grant the Administrators certain online controls over the curated course and quiz statistics so that Our Partners could benefit from the Platform functionality, therefore, We facilitate their awareness of the course participants' course grades, progress and scores. As it goes for the Customers and Users, We generate electronic credentials for the Administrators to access their administration accounts and ask for their names respectively. Current access rights of the Administrators enable them to view certain reporting insights and assign course licenses to the Users.
- d) The Administrator can view contract description, name of the Partner, landing page of the contract, number of purchased licenses, license duration, available courses, licenses overview containing a full name of the User, their email, course/product available to them, the date when the license was granted to them, the date when the license expires and their course progress. Apart from the data which is collected about and accessible to the Administrator, they can view the

“Quiz statistics” comprising the dates in which the Users started and finished a particular course or chapter, full names of the Users, their email, score obtained after completion of the course or its chapter, and the course title.

As an additional service, We can offer the Partners monthly/quarterly reports with the following types of data:

- 1) first and last name;
- 2) email address;
- 3) course license activation/expiration;
- 4) (quiz) progress on the course;
- 5) video progress on the course (upon a prior agreement with Us); and
- 5) country of the User.

In addition Partners can request data reporting statements which may contain the following:

- percent of videos watched (no User specific data included, only a bar chart with aggregated data);
 - average quiz tries (no User specific data included, only a total figure);
 - finished quizzes (no User specific data included, only a total figure);
 - video progress of Users (name, email, video progress, license duration).
- e) We may also share the sales revenues earned through purchase of courses by Our Customers and Users with certain Partners if the Customer/User was redirected to Us by the Partner. In this event We can share Your name and the purchase date with a relevant Partner.
- f) Besides all the data types elaborated on above, We receive the data produced over time by way of interacting with Us, using the Services and Platform by the Customers, Administrators, Users, Signatories, and Representatives.

Most of the data We receive for provision of the Services and communication with You, is received on the legal bases of a necessity to enter into a contract, contract performance, Our legitimate interests or those of Our vendors (processors). Virtually all kinds of the data specified above are mandatory for the Services provision and use of the Platform.

On top of the pre-contractual and contractual settings through which We can collect and process Your Personal data, the Website also allows You to sign up for Our free lectures

by providing Us with Your email address. Full name and email address are required to sign up to Our newsletters. In addition, if You want to send us a general query or message, You can use Our Help center feature by providing Your full name, contact details, subject of Your message and other information related with the request.

Our social media features enable the Website Visitors and other Data subjects to share their reactions and comments on Our Twitter and Facebook pages, as well as on Our YouTube channel. Please consult privacy notices and practices of these social media platforms on what data You can share with them by using these social media buttons on the Website and their platforms. These kinds of data are not mandatory for the Services provision.

Vendors and other recipients of Your personal data



What this section elaborates on: We are explaining the vendors' data processing practices for operating the Website and Platform, interacting with You, and making Our Services available to You. We also give You a grasp of who We may share Your personal data with other recipients.



Note: You can also run over the Cookie Notice for getting a grasp of what analytics, performance, statistics and other cookies are installed by Our cookie vendors mostly for marketing purposes

Personal Data Processing Practices Shared by All the Vendor Categories

Automatically collected data: all the vendors indicated above may receive all types of automatically collected data as specified in the Data Roadmaps above, such as IP addresses, and URLs, technical information about your device (e.g., browser type, operating system, basic device information), the web page You visited or search query You entered before reaching Us, and Your activities, regardless of whether You have the account with them or not.

Some of the vendors may receive data related to media viewing, listening to, or accessing (including when You stop and start media, how many and which media of a

particular customer of their product You watched, and how many times You watched, listened to, or accessed particular media).

Data retention period: the Personal data transmitted to and collected by the aforementioned vendors is retained for as long as it is needed according to Our or their purposes, until deleted manually upon Your request, or as long as We or Our vendors need it on the basis of legitimate interests and legal requirements.

Legitimate interests and indirect use purposes: the vendors may use the Personal data they receive by way of Our use of their products and services for the purpose of analyzing, troubleshooting, expanding, improving their services, as well as developing new products and functionality, and other marketing and business activities. Where possible, We will insist on de-identification and aggregation, or anonymization of the Personal data used by these vendors for such aims. Where the Personal data is anonymized, the GDPR will no longer apply to their processing. Besides, **You have certain objection rights towards some vendor processing actions**, please see them below throughout the Privacy Notice. The vendors may rely on legitimate interests or contract performance basis to carry out such actions.

Data transfers outside of the EEA: many of our vendors process Personal Data in third countries, including the US. The European Commission adopted its adequacy decision for the EU-US Data Privacy Framework on 10th July 2023. However, other third countries may not ensure an adequate level of data protection. Transfers to these countries are made subject to appropriate safeguards. To obtain further information about these safeguards please contact: datasecurity@123sonography.com.

IT services and technical maintenance vendors

Web hosting products are used by Us to store and host Our programming code, programming modules, databases, client management information, various images, files, folders, and other business and work data relating to the Services and Platform. If the foregoing information contains the Personal data, the vendors of these web hosting products and software may receive and process such Personal data.

We use IT services from Hetzner Online GmbH, Mathpix Inc, OpenAI, LLC and Linktree Pty Ltd to host Our Website, the Platform and the databases and applications required to provide the Services.

Our CRM-database is hosted by Zoho Corporation B.V.

Cookiebot being operated by Cybot A/S enables You to have control over Your cookie choices on Our domain.

Video hosting vendors

This category of processors is needed to host, run, and operate Our video-related course materials, whether payable or free of charge, and promotional clips. The given vendors provide players, media, APIs, plug-ins etc. to deliver Our Services in the form of video materials to You.

These vendors use certain persistent first-party cookies to provide the best user experience and remember Your preferences on their platforms.

The video players may send information about Your activities on their platforms to cookies placed by others (such as ad networks) on Your devices through web beacons, VAST tags, and other technologies. YouTube platform also may deliver advertisements and sponsored content to You via cookies and similar technologies. The installation and use of such cookies by advertising networks and other entities depends on Your browser's privacy settings, Your advertising choices on these video hosting platforms, and personal data processing practices of the particular advertising networks.

Some video hosting platforms allow You to adjust your preferences in their Cookie Settings and opt out of non-essential cookies if You are located in the European Economic Area.

Wowza may automatically set cookies to Your browser to analyze the way their services and platform are used.

Wowza may share aggregate or de-identified information about You with third parties for marketing, advertising, research, or other purposes.

Wowza may combine information gathered from cookies and other tracking mechanisms with other personal information they collect from You in order to be able to provide a more personalized service to You.

Wistia may purchase from third parties, like Clearbit, Personal data about users who provide their email address or register for their services, using the Personal data those users provide as the basis to obtain further Personal data. This data may

include names, titles, companies, and firmographic information. Wistia may provide aggregate, statistical information about the access to, views of, and use of media that customers post to YouTube; Personal data generated automatically by Your access to, views of, and use of media may be aggregated and included in that statistical information. Wistia may also provide this aggregate information to their partners.

For more detailed information, please consult the privacy notices and statements of the particular processors: <https://policies.google.com/privacy#intro>, <https://www.wowza.com/legal/privacy>, <https://wistia.com/privacy>.

Project and team management, content creation vendors

The purpose of using this category of vendors is to manage and control our customer relations dataflows, organize Our own staff, advisors, consultants and other contractors engaged in the cycle and process of assisting Us to provide, deliver, operate, and maintain the Services and Platform to Your benefit.

The products and software operated by the project and team management vendors may receive Your Personal data when We share the files, documents, case incidents, requests, occurrences and other events involving You with them.

Examples of content these processors may receive and store include: the summary and description added to incident issues, the pages We create in their working space and boards, the name of boards, Our repositories and pull requests in cloud hosting storages, any stories We name in such working spaces, and any feedback We provide to them. Content also includes the files and links We upload to the Services.

Such tool as Gsuite is utilized for storing, sharing, creating the files by means of Google Docs, Google Sheets, Google Presentations, as well as in the Word format, in the form of PDF and by means of other applications available for integration and synchronization with Gsuite. Google LLC receives any data We include in the files and documents which are uploaded to Gsuite.

Other software tools allow Us to create, run, control, and operate various projects, requests, cases, and incidents, as well as enable Our team of employees, advisors, and consultants to interact with regard to any steps and events in the cycle of the Services provision. Some tools enable Us to integrate different add-ons and applications' functionality to streamline Our internal workflows and commercial processes.

Invoice processing vendors

Chargebee serves the aim of storing Our invoices issued to the Partners and Customers and maintaining a whole invoice production and operation processes. These vendors may have access to any kinds of data contained in the invoices and related documents.

Payment-related vendors



Note that payment-related vendors may collect and process the Personal data for their own purposes as controllers

PayPal and Stripe serve the aims of obtaining payments from the Partners and Customers, canceling subscriptions, double checking and verifying payments from the Partners and Customers.

Here are the kinds of the Personal data that PayPal and Stripe may collect when You use their services:

Information that identifies You, for example: first and last name, address, phone number, email, IP address, information collected from cookies or other tracking technologies;

Records and financial information, for example: Social Security Number, government-issued identification, bank account and routing numbers, credit and debit card information, financial information;

Personal characteristics, for example: age, national origin, disability, citizenship, military status;

Commercial information, for example: online shopping cart information, purchase history;

Internet or network activity, for example: interactions with their services or sites, shopping history;

Geolocation data, for example: global positioning system (GPS) information when You give them permission through Your device settings, IP-based geolocation;

Audio, electronic, visual, biometric, or similar information, for example: call recordings when You talk to their customer service, voice identification, when You consent to this biometric method of authentication, photo IDs and profile pictures You provide;

Professional or employment information, for example: business information, contact emails and phone numbers, tax IDs;

Information PayPal infers based on Your personal data, for example: fraud and risk assessments, personalization preferences.

Since both PayPal and Stripe belong to financial companies and render payment-related services in numerous countries, these entities are subjected to a separate category of legislation setting forth anti-money laundering and know-your-customer regulations across borders. These financial regulations mandate more severe requirements to fraud and risk assessment standards which can result in a much longer period for storage of Your Personal data, depending on a particular country and legal norm.

Besides, We use banking services from Erste Bank. Erste Bank receives payment-related information, invoice and purchase history of Our Partners and Customers, which is accessed by Our accounting department and management to measure Our sales, revenue, and commercial performance.

MaxMind's GeoIP2 JavaScript Client API and MinFraud service may be used by Us for the aim of monitoring Our Customers, Partners, their Users, assessing any payment and financial risks associated with Your purchases on the Website and Platform, and preventing unlawful and malicious activity. MaxMind collects IP addresses, geolocation data, billing addresses, HTTP headers and may have access to some of Your purchase-related information.

MaxMind reserves the right to compile user databases that pair IP addresses with the locations in which they are likely being used, down to a postal code level of resolution, along with other fraud analysis data, and may share/sell such databases with MaxMind's customers, business partners and resellers. Such databases are compiled using numerous data sources, including information MaxMind receives from its customers when individuals make purchases or conduct other transactions with their customers. In addition, MaxMind responds to API queries from its customers, and such responses may include information about the level of risk

MaxMind associates with information about Your device or email address, or Your Unique ID.

For more detailed information, please consult the privacy notices and statements of the particular processors: <https://www.paypal.com/us/webapps/mpp/ua/privacy-full#dataCollect>, <https://stripe.com/en-at/privacy#personal-data-we-collect>, <https://www.maxmind.com/en/privacy-policy>, <https://www.sparkasse.at/erstebank-en/about-us/privacy#/general-info/expand/true/processing/expand/true>.

Communication vendors

Our communication processors may be represented by and classified into several groups:

- 1) vendors used in Our internal team interactions, including both Our staff and contractors;
- 2) vendors used for external interactions, messaging, and communication with the Data subjects;
- 3) vendors used for distributing newsletters and other Services-related messages to Our Customers, Partners, and those who subscribed for Our newsletters and updates;
- 4) vendors used for reviewing, rating, and checking out Our Company, Services, Website and Platform;
- 5) vendors used for communicating and interacting with You through social media platforms and Our pages on these social media. This group consists of Twitter, Facebook, and YouTube.

In some circumstances, local laws require that these vendors retain telephone records (for billing purposes) for a specific period of time, in those circumstances they follow the law for each region. Additionally, if We request them to keep Your data to support a legal obligation, these vendors will respect Our request.

Applications which Our employees use to communicate internally or which We use to communicate with Our prospective and current Partners, Customers, and other Data

subjects collect all kinds of automatically generated data and all data transmitted to them by means of Our calls, chats, and meetings.

The third category of these vendors is mainly used to send out system messages, such as password reset, technical errors, and other maintenance communications, whereas Zoho serves the purpose of delivering various service and marketing newsletters to You based on Our assumptions of what may be of interest to You.

When We upload Our distribution list or when You sign up to Our newsletters through the Website or other signup form, We provide Zoho with certain contact information or other Personal Information about You such as Your name and email address.

We uses web beacons in Our emails. When you receive and engage with Our newsletter campaign, web beacons track certain behavior such as whether the email was delivered and opened and whether links within the email were clicked.

Information which the fourth category of vendors collects about You will depend on whether You have the account with them or not.

Usually, they may receive the following types of data about You:

Contact information: Your name and email address or any other contact details you may provide to them from time to time;

Device and location information: any automatically generated data;

User account information: Your username, password, photo, location and preferred language;

Business account information: Your password, Your company name and domain, and certain other information You choose to add to Your business profile, such as details about the type of services Your company offers;

Usage and profiling information: Your search history, how You have interacted with their platform, including time You spend on their site, features or functions You have accessed, and links You have clicked;

Information about reviews and ratings;

Information about views, likes and how useful Your review is for others: how many people read Your review and how many people find Your review “useful”.

They also collect information if You click “useful” on someone else’s review.

Survey Monkey may collect the kinds of data relating to the surveys You take upon Our invitations and set technical and operational cookies and different tags to gather the traffic data for troubleshooting, maintaining, and improving their product.

Survey Monkey uses automated processes and machine learning to analyze survey responses, which in turn helps them to identify trends, build product features that optimize responses, make product recommendations and provide guidance on which products and services work best in different scenarios.

We are running corporate social media pages on such platforms as Twitter and Facebook, as well as operating Our YouTube channel. We can see and collect the Personal data You leave through these platforms and the channel if You interact with Our content published in there by sharing Our posts, videos, commenting on them, reacting to such materials and by carrying out other actions in these social media.

Analytics, statistics, performance, marketing vendors

For web-analytics and running Our online advertising campaigns we use the following tools and applications:

- a) Google AdWords and Google Analytics, by Google Ireland Limited
- b) Instagram and Facebook pixel, by Meta Platforms Ireland Ltd.
- c) LinkedIn, by LinkedIn Ireland Unlimited Company.

Other recipients of Your Personal Data

Other recipients of Your Personal Data include:

- Our founders, directors, management, consultants, advisors, contractors, investors;
- Governmental bodies, authorities supervising personal data processing activities, courts – upon their official requests and demands. If requested to disclose the Personal data upon mandates of the foregoing bodies, the Company will strive to share only that portion of the Personal data which is

strictly necessary to satisfy their requests, if such action is possible according to advice of legal counsel;

- Any other third persons, only upon Your explicit written request and if it doesn't infringe Our obligations under the GDPR.

Your Rights with Regard to Your Personal Data and Data Retention



What this section elaborates on: We give You a grasp of what data protection rights You have and how long we store your data

When accessing, browsing, using the Website, Our Services and Platform, You will be entitled to certain rights set out by the GDPR.



Note you can exercise Your rights by sending an email to datasecurity@123sonography.com.

You have the right to access your Personal Data, the right to rectification, the right to erasure, the right to restrict processing, the right to object, and the right to data portability.

You have the right to access your personal data. You also have the right to file a complaint with the competent data protection authority.

If You provide Us Your consent for processing a specific category of the Personal data, then You have the right to withdraw this consent. For instance, You can control/change Your cookie choices directly on the Website.

Personal Data retention Period or Criteria for Such Retention:

The Personal data is retained for as long as it is needed according to Our or Our vendors' purposes, until deleted manually upon Your request, or as long as We or Our vendors need it on the basis of legitimate interests and legal requirements, and in other circumstances stipulated by applicable laws.