

# Privacy Policy

(version July 2021)

This policy (the Privacy Policy) explains how and for what purpose the controller, Elevate B.V., located in Utrecht, Netherlands (hereafter, 'Elevate', 'we', 'us' or 'our'), use your personal data collected through our services, website, <http://www.elevatehealth.eu/> (hereafter 'Site'). You can be confident that we handle your personal data with due care. Please read this policy very carefully.

## 1. What is personal data?

Personal Data is information that says something about you. The best know forms of personal data are your name, address, email address, age and date of birth. Personal data also includes your bank account number, your phone number and for example your IP address. In this policy you will read more on what personal data we will collect and for what reasons it is used.

## 2. The Personal Data that we process

Some of our Site's functionality can be used without submission of any of your Personal Data, however, for features or services related to the courses, submission of personal data is required. Inaccurate information may affect your ability to use the Site, the information you receive when using the Site, and our ability to contact you. For example, your email address should be kept current because that is one of the primary manners in which we communicate with you. We gather the following information about users through the Site:

We collect Personal Data that you provide to us when you sign-up for email updates or our courses, participate in our public forums, send Us email messages, and/or participate in our courses or other services on our site. Among other things, we may use the Personal Data that You provide to respond to Your questions, provide you the specific course and/or services You select, send You updates about Courses offered by Elevate or other Elevate events, and send You email messages about Site maintenance or updates, among other things. You are responsible for ensuring the accuracy of the Personal Data you submit to Elevate. For further information please read this policy carefully.

## 3. Which legal ground we have for processing your personal data?

Processing of Personal Data is only allowed when it is based on one of the "grounds" permitted by law. This means that we may use your personal data for one or more of the following permitted reasons:

- when necessary to perform our contract with you
- to serve our legitimate interest or those of others
- when necessary to comply with a legal obligation; or
- when you have given your consent

Examples of our legitimate interests that allow us to process your personal data are as follows:

- o Analysing our Services to make sure we provide you with the best possibilities
- o We use your Personal Data to inform you about our company, relevant developments and other related information to our Services that were or are of your interest
- o Develop new services based on historical and user information

If you have given us your consent for the processing of your personal data, you may withdraw this consent at any time. You can send a request to this effect to [info@elevatehealth.eu](mailto:info@elevatehealth.eu).

#### 4. For what purposes do we use your personal data?

We use your Personal Data to help make our operations and our services as effective, reliable and efficient as possible. In more detail we can do this for the following purposes:

- *Updates.* Elevate may offer you the ability to receive updates either via email or by posting on portions of the Site only accessible to registered users. In order to subscribe to these services, You may be required to provide Us with Personal Data such as Your name and email address.
- *Participation in Courses.* From time to time, Elevate may offer You the opportunity to participate in a Course on or through the Site. If You desire to participate in a Course, You will be asked to provide Us with certain information necessary to conduct such a Course. This information may include, among other things, Your name and email address.
- *Communications with Elevate.* When you send us an email message or otherwise contact us, we may use the information provided by you to respond to your communication and/or as described in this policy. We may also archive this information and/or use it for future communications with you.
- *Marketing*
- *Improve our Services*

Elevate does not sell e-mail addresses or other general information that you provide in the registration process to other parties.

**Non-Personal Information.** We use Non-Personal Information in aggregate form to build higher quality, more useful services by performing, but not limited to, statistical analyses of the collective characteristics, behavior of our Users, and by measuring demographics and interests regarding specific areas of our Site. We may also use it for other business or scientific purposes.

If we would like to use your personal data for any other purposes than those listed in this policy, we can only do so if this is in line with the purposes for which we have initially collected your personal data. Otherwise, we first need to obtain a new legal ground to process your personal data for those new purposes.

#### 5. Cookies

##### **Cookies, web beacons and comparable techniques.**

We also use or may use cookies and web beacons to help Us determine and identify repeat visitors, the type of content and sites to which a User of our Site links, the length of time each User spends at any particular area of our Site, and the specific functionalities that Users choose to use. Essentially, cookies are a User's identification card for the Elevate servers. Web beacons are small graphic files linked to our servers that allow us to track your use of our Site and related functionalities. For more information about our cookies, please see our [cookie statement](#).

*Google Analytics.* We use Google Analytics to collect information about the use of this site. Google Analytics collects information such as how often users visit this site, what pages they visit when they do so, and what other sites they used prior to coming to this site. We use the information we get from Google Analytics only to improve this site. Google Analytics collects only a part of the IP address assigned to you on the date you visit this site, rather than your name or other identifying information. Although Google Analytics plants a permanent cookie on your web browser to identify you as a unique user the next time you visit this site, the cookie cannot be used by anyone but Google. Google's ability to use and share information collected by Google Analytics about your visits to this site is restricted by the [Google Analytics Terms of Use](#) (as amended for government websites) and the [Google Privacy](#)

Policy. You can prevent Google Analytics from recognizing you on return visits to this site by disabling cookies on your browser.

## **6. Social Media**

*Third Party Sites.* We may receive Personal Data when You access or log-in to a third party site, e.g., Facebook or Twitter, from our Sites. This may include the text and/or images of Your Personal Data available from the third party site. We may collect user data for conversion tracking and serving ads targeted to users' interests. You can opt out of interest-based advertising through methods that the third party sites may specify.

*Google AdWords remarketing.* Elevate also uses the Google AdWords remarketing service to advertise on third party websites to previous visitors to our site. Third-party vendors, use cookies to serve ads based on someone's past visits to the Site. Any data collected will be used in accordance with our own Privacy Policy and Google's privacy policy.

## **7. How long do we keep your personal data**

As set under the General Data Protection Regulation, we keep personal data in any event for as long as is necessary to achieve the purpose. The law does not stipulate specific storage periods from a legal data protection perspective. If other legislation provides us with minimum storage periods, then we are under the obligation to observe these periods. Such legislation includes tax laws. Another reason for which we may keep your data longer is if we become involved in a lawsuit or other legal proceedings.

## **8. Personal Data outside European Economic Area**

We may occasionally share personal data with other companies or organizations outside the European Economic Area, for instance in the context of an outsourcing agreement or technical support. In that case, we will verify that the country has adequate equivalent protections in place, or we will sign separate agreements with those parties that meet the GDPR standards.

## **9. External Links**

For Your convenience we may provide links to websites operated by organizations other than Elevate ("Third Party Sites") that we believe may be of interest to you. We do not disclose your Personal Data to these Third Party Sites without obtaining your consent. We do not endorse and are not responsible for the privacy practices of these Third Party Sites. If you choose to click on a link to one of these Third Party Sites, You should review the privacy policy posted on the Third Party Site to understand how that Third Party Site collects and uses Your Personal Data.

## **10. Confidentiality & Security**

We consider the confidentiality and security of your Personal Data to be of the utmost importance. We will use commercially reasonable efforts to keep Your Personal Data private and will not share it with third parties, except as otherwise provided in this policy, or unless we have good faith belief that such disclosure is necessary in special cases, such as a physical threat to You or others.

Elevate takes reasonable measures to protect Your Personal Data from disclosure to or access by third parties.

Elevate may disclose Your Personal Data if it believes in good faith that it is required to do so in order to comply with applicable law, a subpoena or other legal process. Elevate may also disclose this information if it has reason to believe that disclosing this information is necessary to identify, contact or bring legal action against someone who may be violating this policy or to protect the safety of Users and the public.

## **11. Changing Our Privacy Policy**

Elevate reserves the right to review and change the Private Policy from time to time. Any change, update, or modification will be effective immediately upon posting on our site. We will notify you of any material change to this policy by posting a notice on our site's homepage for a reasonable period of time following such update, and by changing the effective date (located at the bottom of this page). Be sure to return to this page periodically to ensure familiarity with the most current version of this policy.

## **12. What rights do you have?**

Please be informed that you have several rights under the GDPR. These rights are briefly stipulated hereafter.

- You have the right to access your data. For this purpose, you can ask us what data are registered and what they are used for if that is not clear to you.
- You have the right to have the data we collect from you corrected, changed or supplemented if these are incorrect or incomplete.
- You have the right to ask who has access to your data. You can ask us what data are registered and who has/had access to them.
- In certain legal instances, you have the right to have your data erased.
- In certain legal instances, you have the right to have less data processed by us.
- You have the right to object to the processing of your personal data by us.

You can send us a request at [info@elevatehealth.eu](mailto:info@elevatehealth.eu). Please note that while any changes you make will be reflected in active user databases within a reasonable period of time, we may retain all information you submit for backups, archiving, prevention of fraud and abuse, analytics, satisfaction of legal obligations and therefore not in all situation we can adhere to your request.

## **13. Right to data portability**

If we process your personal data on the basis of your consent or on the basis of the contract we concluded with you we can arrange that you receive the data that you have provided to us electronically, which we store by automated means, so you can provide the data to another party you choose. This is referred to as data portability. Information which is processed for the purpose of a legal obligation or legitimate interests is not covered by this obligations.

## **14. Contact**

If at any time you would like to contact Us for such request or any other enquiry about the protection of your Personal Data, you can do so by sending an e-mail to [info@elevatehealth.eu](mailto:info@elevatehealth.eu).