

Berlin School I Data & Privacy Policy

The Berlin School of Creative Leadership takes the protection of your personal information extremely seriously and <u>adheres to the General Data Protection Regulation</u> (GDPR).

Information about us

This site is operated by the Berlin School of Creative Leadership GmbH registered at the following authority:

HRB120223 B Amtsgericht Berlin-Charlottenburg

The registered address is

Gotzkowskystr. 20/21 10555 Berlin

Our VAT number is DE 268594135

CEO: Susann Schronen

This website is operated on behalf of:

- Berlin School of Creative Leadership GmbH
- Berlin School of Creative Leadership Foundation gUG
- Berlin School of Creative Leadership Foundation

Hereafter, referred to as Berlin School.

Our protection policy applies to the use of the following websites:

This Privacy Policy applies to <u>www.berlin-school.com</u> and <u>www.hocbl.com</u> including all content and services accessible through these websites.



Legal grounds for collecting and processing your personal data

We only collect your data if we have received permission to do so. In the event of subscribing to services, you will be asked to read this policy and to confirm permission.

Furthermore, we only process data that are necessary for the service selected or to take steps to enter into a contract (see Art. 6 GDPR). In individual cases, we may be obligated to surrender personal data due to a court order from competent government authorities if this is required to avert risk, criminal prosecution, or for other statutory reasons.

As data protection is our utmost priority, we also ensure that our data is stored securely and that our technological devices and services are always meticulously supervised (Art. 32 GDPR). Among other things, this includes firewalls, password protection and screening of personnel prior to hiring.

Deadlines for erasure

If not specified explicitly, we only store your data as long as necessary in order to process your request or services selected and according to statutory requirements.

In case of subscriptions, we only store your data until you unsubscribe. In case of contracts, we only store your data as long as necessary.

Your Rights

According to the rights under the GDPR, you have the right to be informed about the collection and use of personal data (see Art. 7, 13, 14, 15 GDPR).

You may, at any time, revoke permission for your personal information to be stored, or for your information to be used for mailings. You may send your revocation via email to <u>data@berlin-school.com</u> or use the unsubscribe option in the newsletter.

As a data subject, you also have the right to access personal data stored by the Berlin School or to request changes/updates in the data sets stored. Moreover, you also have the 'right to be forgotten' (see Art. 17 GDPR) i.e. the right to ask us to delete your information held by us or to object to the storage of your data (Art. 21 GDPR). The only exception to this is if storing your data is required by us to establish, exercise or defend



legal claims, e.g. as a result of a contract between you and the Berlin School. You may also object to the storage of your data under the right guaranteed under Article GDPR, section 1 e or f. In particular, if the storage of personal data infringes your fundamental rights and freedoms, which require protection of personal data, especially where the data subject is a child.

If you are under the impression that the Berlin School is not adhering to the GDPR, it is your right to report us to the responsible authority.

Collecting, processing, and use of personal data

What is personal data?

"Personal data" refers to information that is related to determining the identity of a natural person ('data subject'), such as name or location data. Apart from generic data, personal data may also include special categories of data, for example gender, religious/political beliefs, or ethnicity.

What personal data does the Berlin School collect and how is your data being processed?

When accessing the Berlin School website or downloading files, our server automatically gathers and temporarily stores the following information submitted by your browser:

- IP address of the computer that submitted the query
- Client file requests
- The website that directed you to us (referrer URL)
- Browser type and version
- The operating system used by the computer that submitted the query
- Name of the accessed website
- File, date, and time of access
- Volume of transferred data
- Confirmation of successful access



The Berlin School only uses this information for statistical purposes, for example to assess traffic volumes. No personal information is analyzed through the server log files. The Berlin School is not able to link information to individuals. This information is not merged with other sources of data. Data is deleted after completion of the statistical analysis.

Depending upon your use of our site, e.g. downloads or newsletters, we may collect some or all of the following personal data:

- First name
- Last name
- Gender
- Date of birth
- Contact information, such as email addresses, telephone numbers, Skype
- Job title and company
- Industry
- Demographic information, such as post code, preferences and interests
- Financial information, such as credit/debit card numbers

All data collected is processed by authorized personnel only (Art. 29 GDPR) and is only being processed in connection with the service selected by you. This may include processing your data in order to create mailing campaigns for EMBA, Executive Education programs, or event invitations.

Newsletter and mailings

When registering for our newsletter, you provide us with your email address and, on an optional basis, other information. To ensure that you have given us permission to send you the newsletter, we use double opt-in procedures. In the course of this, the prospective recipients can be added to a distribution list. Users then receive a confirmation email to confirm the application legally. Once the confirmation is made, the address is actually added to the distribution list. We use these data solely for the purpose of sending you the newsletter or mailing campaigns that provide regular information about our current projects, programs, and events as well as further news from the Berlin School universe.

We retain the data that you disclose in your newsletter application until you cancel your subscription to our newsletter. You can unsubscribe at any time via the link in the newsletter intended for this purpose, or by sending us the appropriate notification to



data@berlin-school.com. By unsubscribing, you revoke the use of your email address. Data protection processes are subject to continual updates. For this reason, we would ask you to review our data protection measures at regular intervals by reading our data privacy declaration.

Data storage and sharing information with third parties

We do not generally share your personal data with third parties unless required by domestic or EU legislation. However, we may sometimes contract with third-party data processors that are located outside the European Economic Area (EEA). If we transfer any personal data outside the EEA or offer services hosted on non-European platforms, we will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the EEA and under the GDPR.

Automated decision-making and profiling

Depending on the service selected by you (e.g. interest in our EMBA or Executive Education programs), we will analyze your information for statistical reasons and to build clusters. These profiles will then be used to predict future interests and display targeted marketing. This profiling is based on the service you selected, e.g. newsletter or application and the interest you indicated in the downloading process. This happens with your knowledge and consent and you have the right to withdraw your consent at any time by sending an email to <u>data@berlin-school.com</u>.

Use of cookies

The Berlin School uses cookies on its websites <u>www.berlin-school.com</u> and <u>www.hocbl.com</u>. Cookies are small text files that are saved to the hard drive of your computer by websites. They make it possible to analyze your use of a website. Cookies do not allow servers to read personal information on your computer or information stored by other servers. They cause no damage to your computer and do not contain viruses.

The cookies used by our website do not store any personal information about you or how you use the website. We use the information stored by cookies to make it easier for you to use our website and to match content to your needs.



You can of course visit our website without using cookies. If you do not want your computer to store cookies, you can deactivate certain cookie options in your browser settings. Any cookies that have already been placed on your computer can be deleted at any time in your browser settings. Please refer to the help menu of your internet browser for further information and details of how this works. Please note that some functions on our website may not work if you deactivate your cookies.

Our use of analytics

Websites operated by the Berlin School use analytics services provided by Google. Website analytics refers to a set of tools used to collect and analyze anonymous usage information, enabling us to better understand how our sites are used. Among other things, this enables us to improve our sites and the services offered through it. You do not explicitly have to give us permission to collect site analytics, however, whilst our use of them does not pose any risk to your privacy or your safe use of our sites, it does enable us to continually improve the user experience and services and products connected to our site.

Google Analytics uses cookies to generate information about your use of this website and is usually transmitted to and stored on a Google server in the USA. However, if IP anonymization is activated on this website, your IP address will be shortened beforehand by Google within member States of the European Union or in other signatory states to the treaty on European Economic Area. The full IP address will be transmitted to a Google server in the USA and shortened there only on an exceptional basis. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators, and providing other services to website operators relating to website activity and internet usage. Google will not associate the IP address transmitted under Google Analytics by your browser with other data held by Google.

If you wish to limit data transferred to Google analytics, we recommend that you adjust your privacy settings and that you keep your internet browser and operating systems up to date. However, please be aware that in case you block cookies, you might not be able to enjoy all the functionality of this website to its full extent.

Additionally, you may prevent the recording of the data (including your IP address) to Google that is generated by the cookie and that pertains to your use of the website, or the processing of these data, by downloading and installing the following browser plug-in available through the following link: <u>https://tools.google.com/dlpage/gaoptout</u>.



In view of the discussion about the use of analytics tools with full IP addresses, we would like to point out that this website uses Google Analytics with the extension "_anonymizelp()" which means that IP addresses are used only in a shortened form in order to prevent any direct correlation to specific reasons. For browsers or mobile devices, please click this link to prevent anonymous tracking by Google analytics and to activate a so-called 'opt-out cookie' for your browser.

You can read more about Google analytics' privacy notice here: <u>www.google.com/analytics/terms/us.html</u>

Responsibility for links and embedded videos

Our website contains hyperlinks to third-party websites that are not part of our legal responsibilities. We clearly state that such websites contain third-party content which is not provided or owned by the Berlin School. The owners or operators of third-party websites are responsible for the content of such websites under all circumstances. Websites linked to our website were checked for illegal content when the link was programmed. No illegal content was found on third-party websites when links were set up.

When you access a respective site of our online offers that contains an embedded YouTube player, a connection to YouTube is established, so the video or audio file can be transmitted and played back. In doing so, data is transferred to YouTube as a data processor. We are not responsible for the processing of such data by YouTube. Additional information on the scope and purpose of collected data as well as further processing and the usage of data by YouTube, on your rights and the privacy options available, can be read in YouTube's data protection notice.

Changes to our privacy notice

We may change this privacy notice, for example as a result of legal changes. Any changes will be posted on our sites immediately. If appropriate, you will be notified by email. We recommend that you check this page regularly to keep up to date.



Contact

If you have any questions regarding the use of your data, you can contact us directly, either via mail or via email.

Please email <u>data@berlin-school.com</u> or write us a letter to the following address:

Berlin School of Creative Leadership GmbH Gotzkowskystr. 20/21 D -10555 Berlin