# **Privacy Policy**

This Privacy Policy describes how Sanderland websites and services (sanderland.eu), owned by Sanderland d.o.o. and its affiliates (collectively "Sanderland," "us," or "we") process personal data and other information through Sanderland websites, applications, and other online platforms (our "Services"). This Privacy Policy explains what types of information we collect, how we use it, our sharing practices, and your choices.

We encourage you to periodically review this Privacy Policy for the latest information on our privacy practices. We will update this Privacy Policy to reflect any changes to our practices. If we make any material changes, we will notify you in accordance with applicable laws prior to the changes becoming effective.

Owner and Data Protection Officer

If you have any questions or comments regarding this Privacy Policy, our privacy practices, or if you wish to exercise your individual rights, please contact us using one of the following methods:

Email: school@sanderland.eu

Mail: Sanderland d.o.o. Cesta talcev 5, 2327, Rače, Slovenia

Since the use of third-party Trackers through this website and Sanderland Services cannot be fully controlled by us, any specific references to third-party Trackers are to be considered indicative. In order to obtain complete information, Users are kindly requested to consult the privacy policies of the respective third-party services listed in this document.

Given the objective complexity surrounding tracking technologies, Users are encouraged to contact us should they wish to receive any further information on the use of such technologies by this website and Sanderland Services.

Our Data Protection Officer or another data protection relevant contact can be reached at the email provided above.

# The User's rights

You may contact us at any time if you have any questions concerning your data privacy rights or if you wish to exercise any of the following rights afforded to you under the General Data Protection Regulation (2016/679; the "GDPR"). You have the:

- Right to withdraw your consent in accordance with Art. 7 para. 3 GDPR (e.g. you can contact us if you wish to cancel a previously given consent to receive our newsletter)
- Right to access your data in accordance with Art. 15 GDPR (e.g. e.g. the right to be informed whether or not personal data about you is being processed, what personal data is being processed, and the purpose of the processing.
- Right to correct your data in accordance with Art. 16 GDPR (e.g. you can contact us if your e-mail address has changed and you would us to update the details we hold)
- Right to have your data deleted in accordance with Art. 17 GDPR (e.g. you can contact us if you want us to delete certain data that we have stored about you)
- Right to limit data collection in accordance with Art. 18 GDPR (e.g. you can contact us if you only want us to send you absolutely necessary e-mails)

- Right to data portability in accordance with Art. 20 GDPR (e.g. you can contact us
  to receive your data in a commonly used and machine-readable format if you
  want to upload it to another website)
- Right to object how your data is handled in accordance with Art. 21 GDPR (e.g. you can contact us if you do not agree us using your data for analytics as described within this privacy policy)
- Right to send complaints to the supervisory authority in accordance with Art. 77 para. 1 lit f GDPR (e.g. you can contact the data protection supervisory authority directly)

If you wish to file a complaint with a national supervisory authority regarding our processing of your personal data, you may do so by contacting your local data protection authority ("local" meaning where you live or work, or where an alleged data breach has occurred) or the relevant authority in any EU member state.

## Storage periods and deletion of data

We only store your information for as long as is needed to fulfil our contractual or legal obligations or any other permissible purpose for which we have collected it, including to detect and prevent fraud or security incidents. When the applicable retention period has expired, we take measures to permanently delete the information, aggregate it, or anonymize it.

## Visiting our website

If you merely wish to browse our website, we do not collect any personal data, with the exception of the data that your browser sends to us, e.g.:

- Pages and files accessed
- Date and time of access
- Transmitted data volume
- Browser version
- Status messages (i.e. whether the data transfer was successful)
- Information about your device (e.g. browser version, app version, operating system, language settings, device IDs)
- Previously visited pages (if you access our website via a link)
- Online identifiers (e.g. IP address, session IDs, cookies, device identifiers)
- Geographic data (e.g. city, postal code) (transmitted via IP address)

As a safeguard to protect your privacy, we delete or anonymise the IP address according to set deadlines. Therefore, all other data possibly attached to it can no longer be traced back to you. The information we retain is in anonymous form and is only used for statistical purposes to optimise our website. The purpose of temporarily storing this data is to establish a necessary connection between your device and our server as well as ensuring that our website loads effectively. Such data is therefore required to display the website on your screen, to avoid display problems and other technical error messages. The legal basis is our legitimate interest as laid out under Art. 6 para. 1 s. 1 lit f GDPR.

#### Hostina

The personal data processed for use of services is processed solely on servers located within the EU. The hosting provider was carefully selected, and we have signed a processing contract with them as required by Art. 28 GDPR. Our main service provider currently is Hostinger (https://hostinger.com).

# Providing the Sanderland Services

We process your data for the fulfilment of our contract with you and for the purpose of providing and implementing further services requested by you, as described in this Privacy Policy

#### This also includes

- The provision, personalisation and customisation of our Sanderland services (including their respective websites, apps and cross-device functions),
- Ensuring the general security, operability and stability of our services, including the prevention of cyber- attacks,
- Communication in regards to technical/security issues as well as contractual amendments (e.g. fraud warnings, account suspension or contract amendments) and.
- The implementation of campaigns and competitions.

Insofar as the purpose is the implementation of a contract agreed with you or the provision of a service requested by you, the legal basis is Art. 6 para. 1 s. 1 lit. b GDPR. Otherwise, the legal basis is Art. 6 para. 1 s. 1 lit f GDPR, whereby our legitimate interest lies in the above-mentioned purposes.

#### Your Sanderland Account

In order to use our Sanderland language courses, you need to register on our website. When you register on our website, we collect and store your basic data such as (user) name, e-mail address and password. In addition, when you place an order with us, we collect payment details and record your agreement to our Terms and Conditions.

As a protective measure, the data you enter is transmitted via an encrypted connection - just like when you visit our website. After successful confirmation, your data will be stored until you decide to delete your information or your entire user account. The purpose of the requested data is to create a user account for the use of extended functions on the website. Registration is voluntary and can be revoked or the user data deleted at any time. The legal basis is your consent as laid out in Art. 6 para. 1 s. 1 lit a GDPR.

#### Contact

You have the possibility to contact us in different ways on our website. You can get in touch with us about general requests by writing to us at englishpitch.eu@gmail.com. In this context we process data exclusively for the purpose of communicating with you. The legal basis for data processing is the fulfilment of the contract in accordance with Art. 6 para. 1 s. 1 lit b GDPR.

#### Interaction with live chat platforms

This type of service allows Users to interact with third-party live chat platforms directly from the pages of this website, in order to contact and be contacted by this website's support service.

If one of these services is installed, it may collect browsing and Usage Data in the pages where it is installed, even if the Users do not actively use the service. Moreover, live chat conversations may be logged.

Facebook Messenger Customer Chat (Facebook, Inc.)

The Facebook Messenger Customer Chat is a service for interacting with the Facebook Messenger live chat platform provided by Facebook, Inc.

Personal Data processed: Data communicated while using the service, Tracker and Usage Data.

Place of processing: United States – Privacy Policy.

WP Forms plugin

WP Forms is a contact plugin with built-in GDPR compliance. It allows to create all sorts of forms (including contact forms, registration forms, order forms, booking forms, surveys, etc).

To make your forms compliant, simply go to plugin's settings page and check the box next to GDPR enhancements option. Once you've done this, WPForms will not collect IP addresses on any of your forms.

You can also enable extra GDPR options. These include disabling user tracking cookies and disabling storing details of the user's browser and operating system.

The Olark Widget is a service for interacting with the Olark live chat platform provided by Habla, Inc.

Personal Data processed: Cookies, Data communicated while using the service and Usage Data.

Place of processing: United States – Privacy Policy.

#### Recorded Pitches

Whenever you complete a course on our website, all exercise results and recorded audio pitches are stored on our website for the mentor to check and score them. This data cannot be viewed by other users. We will only use, store and otherwise process such recordings in accordance with all applicable laws, rules and regulations, including data protection laws. We will store and otherwise restrict access to such recordings using appropriate technical and organizational safeguards. The legal basis for data processing is the fulfilment of the contract in accordance with Art. 6 para. 1 s. 1 lit b GDPR.

#### Live Pitching Sessions and Private Lessons

Our Live Pitching Sessions and Private Lessons offer Sanderland users the opportunity to take part in one-to-one lessons with a mentor/teacher. During the lesson the mentor/teacher listens to the user's pitch (oral presentation on the topic). The personal data entered during registration by the user is processed as part of this service. The user's name will therefore be visible to the teacher.

Sanderland Live Pitching lessons and Private Lessons take place via several platforms:

Zoom

Zoom Video Communications, Inc. or "Zoom" is a US-based online meeting platform (https://zoom.us).

For information on Zoom's privacy policies please see: https://zoom.us/privacy If you reside in the EU you may consult Zoom's policy here: https://zoom.us/gdpr Skype

Skype Microsoft Ireland Operations Limited is an online meeting platform based in Ireland. For information on Zoom's privacy policies please see:

https://privacy.microsoft.com/en-gb/privacystatement Whatsapp

WhatsApp is a multiplatform messaging application that lets users make video and voice calls and send text messages. Whatsapp is operated by Whatsapp Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland. For information on WhatsApp's privacy policies please see:

https://www.whatsapp.com/legal/privacy-policy

Telegram

Telegram is an online messaging application with enhanced encryption and privacy. It is operated by Telegram Group Inc, located in the British Virgin Islands. For information on Telegram's privacy policies please see:

https://telegram.org/privacy

# Third-Party Payment Processor

We use third party payment processors, Stripe and PayPal, for all payments. We do not store credit card details and instead rely on Stripe and PayPal for this.

We use third party payment processors to process payments made to us. In connection with the processing of such payments, we do not retain any personally identifiable information or any financial information such as credit card numbers. Rather, all such information is provided directly to our third party processors, Stripe and PayPal, whose use of your personal information is governed by their privacy policy, which may be viewed at:

https://stripe.com/us/privacy

https://paypal.com/us/privacy

## Video sharing services

We use Vimeo and YouTube to integrate videos.

Vimeo is operated by Vimeo.com, Inc., with headquarters at 555 West 18th Street, New York, NY 10011, USA. When playing the embedded videos, a connection to the Vimeo servers is established and your IP address may be transmitted for technical reasons. You can learn more at: https://vimeo.com/privacy

YouTube is operated by YouTube LLC with headquarters at 901 Cherry Avenue, San Bruno, CA 94066, USA. YouTube is represented by Google Inc. with headquarters at 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. When playing the embedded videos, a connection to the YouTube servers is established and your IP address is transmitted for technical reasons. If you are also logged into your YouTube user account, YouTube will assign information on the videos you have viewed to your personal user account. You can prevent this assignment by logging out of your YouTube account and other Google Platform accounts before using our website.

The security standards of the Google Platform and the associated Google Privacy Policy (http://www.google.com/intl/de-DE/privacy) apply as protective measures. The purpose of the data transfer is the integration of Vimeo and YouTube videos on our website, in order for our users to be able to access the displayed videos comfortably without leaving our website. The legal basis is your consent in accordance with Art. 6 Para. 1 a GDPR.

#### Newsletter

If you are interested in receiving updates about our company or our products, you can subscribe to our newsletter. You will then receive an email in which you must click on a link to confirm receipt of the newsletter. We store the email address you provided until you unsubscribe from our newsletter. For this purpose, you will find a corresponding link to unsubscribe in every email of our newsletter. The delivery of the newsletter is carried out by a professional service provider.

As a safeguard to protect your privacy, we ask for a so-called "Double-Opt-In" to ensure that the registered email address actually belongs to you. Furthermore, we have entered into a data processing agreement with the assigned service provider. You also have the possibility to unsubscribe from the newsletter at any time and thus delete your email address from the service provider's database. The purpose of the data requested is to send the newsletter to your personal email address in order to fulfil your request for updates about our company or our products. The legal basis is your consent in accordance with the European data protection requirements under Art. 6 para. 1 s. 1 lit a GDPR.

If you register for our Sanderland services, we will also send you marketing emails (advertising to existing customers). You can object to receiving these at any time by sending an e-mail to englishpitch.eu@gmail.com. There is also a corresponding unsubscribe link in every marketing email. The legal basis for this data processing is Art. 6 para. 1 s. 1 lit. f GDPR, based on our justified interest in advertising our products and services.

We use embedded graphics known as pixels in our newsletter emails to track whether or not an email has been opened and which links in the email have been clicked on in order to optimize our offers. We collect this data in pseudonymous form for general statistical evaluations as well as for the optimisation and further development of our content and customer communication. The data is not linked to your personal data. The legal basis for this is our aforementioned legitimate interest in accordance with Art. 6 para. 1 s. 1 lit. f GDPR. We use our marketing emails to share content that is most relevant to you and to better understand what our users are actually interested in. If you do not want us to analyse your usage behaviour, you can unsubscribe from our marketing emails or deactivate graphics in your email program by default. The data on your interaction with our marketing emails are stored pseudonymously to improve deliverability and to remedy technical defects; they are then eventually completely anonymised.

#### Zendesk

We use the service of Zendesk Inc., 989 Market Street #300, San Francisco, CA 94102, USA. The legal basis for the use of this service is our legitimate interest in accordance with Art. 6 para. 1 s. 1 lit. f GDPR. Our legitimate interest in using this service is to be able to answer user enquiries quickly and efficiently.

Zendesk will only use your data to forward your enquiries to us. Your data will not be passed on to third parties.

The service can also be used under a pseudonym. In the course of processing service requests, it may be necessary to collect additional data (e.g. first name, last name, address, etc.)

The use of Zendesk is optional. If you do not agree to Zendesk collecting your data, we offer you alternative ways of contacting us to submit service requests by phone

or mail. For more information, please refer to the Zendesk Privacy Policy: https://www.zendesk.de/company/customers-partners/privacy-policy/.

#### Refer a Friend

On our website we offer you the possibility to invite your friends to join English Pitch. For this, we work together with the company Talkable (https://www.talkable.com). In order to invite your friends, you will have to enter their:

- First name and
- e-mail address

A personal link will then be created which can be sent to the invited friend.

We have concluded a data processing agreement with Talkable that meets the requirements of Art. 28 GDPR.

# Cookies Policy

A cookie is a small text file that is stored in your web browser that allows Sanderland or a third party to recognize you using a unique identifier.

Who sets them: First-party cookies are set by Sanderland. Third-party cookies are set by companies other than Sanderland, such as analytics providers and advertisers.

What they do: "Essential" cookies enable services we offer. "Non-essential" cookies help us understand how our services are being used (i.e., analytics) and deliver advertisements. Some cookies may track you across multiple websites you visit (including ones not operated by us) to help deliver advertisements that may be relevant to you.

How long they last: Cookies may be either "session" or "persistent." A session cookie expires (i.e., is deleted) when you close your browser. A persistent cookie remains until it expires or you delete the cookies via your browser settings. Expiration dates are set in the cookies themselves and may vary in length, depending on the purpose of the cookie.

We use the following three types of cookies on our website:

- required cookies (e.g cookies that required to display the website correctly for you and to store certain settings temporarily)
- functional and performance-related cookies (cookies that help us improve our website, e.g. to evaluate technical data from your visit and therefore avoid error messages)
- advertising and analytics cookies (cookies that provide analytics and personalized ads)

You can use your browser settings to configure, block, and delete cookies. If you delete all cookies from our website, you may find that some website features are not displayed properly. You can find helpful information and instructions for common browsers here:

- Firefox
- Chrome
- Safari
- Microsoft Edge
- Internet Explorer

You may also visit our sites in your browser's "private" or "incognito" mode, in which case cookies will be set, but deleted when you close your browser.

EU users: Users located in the EU may adjust their preferences in their Cookie Settings.

Third party advertising opt-outs: Certain third parties provide ways to opt out of advertising cookies across multiple sites. You can learn more by visiting the sites of the Network Advertising Initiative (https://optout.networkadvertising.org) or the Digital Advertising Alliance (https://www.aboutads.info). In addition, there are third party plug-ins and apps that help manage cookies.

Google cookies: Google provides ways to manage or opt out certain of its advertising cookies (https://adssettings.google.com) and analytics cookies (https://tools.google.com/dlpage/gaoptout). You may read Google's Privacy Policy at https://policies.google.com/privacy.

Cookies are only activated after you have granted express permission, with the exception of those cookies that are required for the technology to work. You can withdraw this permission at any time. You can find information on how to withdraw permission, as well as additional information, in the cookie configuration options.

### Google Fonts

For the visual improvement of the fonts we use Google Fonts (https:// fonts.google.com) from Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google"), a font collection from Google. These fonts are transferred to the storage folder of your browser and activated when you visit this website or other websites. If this is not supported, the text on the web page will only be displayed in a default font. To make this possible, a request is sent to domains such as fonts.googleapis.com or fonts.gstatic.com, which for technical reasons contains your IP address. However, your data will not be merged with other data or traced back to your person.

As a safeguard to protect your privacy, we have assured ourselves that the retrieval of Google's font collection does not merge your data with other Google services, e.g. if you have a Google user account. Information on data protection at Google Fonts confirms this (https://developers.google.com/fonts/faq). In addition, the security standards of the Google platform and the associated privacy policy of Google (http://www.google.com/privacy) apply. The purpose of transmitting the data is the correct display of the fonts in the layout specified by us. The IP address is required to connect to Google's servers to download the font library if it is not already stored on the device. The legal basis is our legitimate interest as laid out under Art. 6 para. 1 s. 1 lit. f GDPR.

## Google Analytics

This website uses Google Analytics, a web analysis service provided by Google Inc. (Google). Google Analytics uses cookies, which are text files saved on your computer that make it possible to analyse how you use the website. Since we have activated anonymization of the data, your IP address will be shortened by Google within the European Union Member States or other states party to the agreement regarding the European Economic Area and only then transferred to the USA. The full IP address will only be transferred to a Google server in the USA and shortened there in exceptional cases. Google uses this information on behalf of the operator of this website to evaluate your use of the website, in order to compile reports regarding website activities and in order to perform additional services for the

website provider connected to website use and internet use. The IP address transmitted from your browser for use in Google Analytics will not be connected to other data from Google. You can prevent the cookies from being saved by selecting the appropriate setting in your browser software; please note that in this case you may not be able to fully use all features available on the website.

You can find additional information on Google Analytics' use of data and data protection at https://marketingplatform.google.com/about/analytics/terms/de/ or at https://marketingplatform.google.com/about/. We only use Google Analytics in combination with the gat.\_anonymizelp(); expansion, so that IP addresses are only recorded in a shortened, i.e. anonymized form.

As a safeguard to protect your privacy, we use the anonymization feature offered by Google as mentioned above, where analytics are not based on you as a person, but only in aggregated form for statistical analyses. In addition, the security standards of the Google platform and its data privacy policy apply (http://www.google.com/privacy). We have also concluded a data protection agreement with Google, which ensures the protection of your data through technical and organizational security measures. The purpose of the use of Google Analytics is to anonymously analyze usage behavior of our websites. The information helps us to improve our services. The legal basis is our legitimate interest as laid out under Art. 6 para. 1 s. 1 lit. f GDPR.

## Google Conversion Tracking

Our website uses Google Conversion Tracking from Google LLC., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA (subsequently: Google), in order to record statistics on the use of our website and for the purpose of evaluating optimization of our services for you. Google AdWords places a cookie on your computer in the event that you have reached our website via a Google ad. If the user visits specific pages on the AdWords customer's website, and if the cookie has not yet expired, Google and the customer can see that the user clicked on the ad and was directed to this page. Every AdWords customer receives a different cookie. Cookies can therefore not be tracked via AdWords customer's websites. The information collected with help from the conversion cookies serves to create conversion statistics for AdWords customers who have decided to make use of conversion tracking. We receive information on the total number of users who have clicked on the advertisement and were forwarded to a page containing a conversion tracking tag. However, we do not receive any information that can be used to personally identify users.

The legal basis for use of this service is your consent as laid out in Art. 6 para 1 s. 1 lit. a GDPR, and consent is granted via our cookie banner. Consent can be withdrawn at any time via the cookie management portal.

# Google Tag Manager

We use Google Tag Manager, a service of Google Ireland Limited, Google Building Gordon House, Barrow St, Dublin 4, Ireland ("Google"). Google Tag Manager allows you to manage website tags through a single interface. According to Google, Google Tag Manager is a cookie-free domain that does not collect personal information. Google Tag Manager triggers other tags that may collect data. Google Tag Manager does not access this data. If disabled at the domain or cookie level, it will remain disabled for all tracking tags implemented with Google Tag Manager. For more

information about Google's privacy policy, please see the Google Privacy Policy: https://policies.google.com/privacy?hl=en-US.

The legal basis for use is your consent in accordance with Art. 6 para. 1 s. 1 lit. a GDPR, which can be granted in our cookie banner. This consent can be revoked at any time via our cookie management tool.

#### LinkedIn Insight Tag

Our website uses the LinkedIn Insight Tag conversion tool from LinkedIn Ireland Unlimited Company. This tool creates a cookie in your web browser which allows the collection of information such as: IP address, device and browser characteristics and page events (e.g. page views). This data is encrypted, anonymised within seven days and then deleted within 90 days. LinkedIn does not share any personal data with us, but rather offers anonymized reports regarding the website's target audience and advertising performance. LinkedIn also offers the option of retargeting via the Insight Tag. Using this data, English Pitch can show targeted advertising outside of their website, without identifying you as the visitor to the website. You can find more information on data protection at LinkedIn in the LinkedIn privacy policy. LinkedIn members can adjust settings regarding the use of their personal data for advertising purposes via their account settings.

The legal basis for use of this service is your consent in accordance with Art. 6 para. 1 s. 1 lit. a GDPR, which can be granted in our cookie banner. The consent can be revoked at any time via our cookie management tool.

## Online advertising

We use service providers to optimise our online advertising outside of Sanderland. By optimisation, we mean that our advertising (e.g. ads on Facebook and Instagram, in Google search results or on other websites that make your advertising space available via an advertising network) is aimed at addressing only those people who might actually be interested in our offers ("personalisation"). For example, we can avoid showing Sanderland ads to individuals who have already signed up to our product. Personalised advertising also enables us to adapt our advertisements to the interests of other users who have never interacted with Sanderland before.

For this purpose, Sanderland services, as well as the services (especially websites. apps) of other companies that participate in the same advertising networks as we do (e.g. Google advertising network), contain special cookies or comparable technologies (e.g. pixel procedures) that are set by the respective providers and provide them with certain access data when using these services. Using this data. the respective providers can create a user profile to determine which websites and apps you use and derive your interests from this (your IP address is only transmitted for technical reasons but is not used for personalisation). The operator of an advertising network can then use this data to display personalised advertisements to you on all advertising spaces connected to their advertising network. For example, if you search for Sanderland courses on Google, Google may use this information to show you our advertising for a free Sanderland resources on another page that is also connected to the Google advertising network. Since we participate in the Facebook advertising network, we may, for example, ask Facebook to display our Facebook Ads only to Facebook members who have visited our site in the last month.

We process the personal data for the above-mentioned purposes on the basis of your expressly given consent.

## Security

Sanderland takes security precautions to guarantee that your data is protected from loss, alteration, or misuse. Sanderland does this with industry standard firewalls that are constantly being updated as well as other security systems. At the same time, the user should be aware that we cannot offer one hundred percent protection from attacks, due to the constant barrage of new viruses and means of attack on internet service's secure data systems. Sanderland will pursue every attack on the data, regardless of who carried it out, under both civil and criminal law, and inform users in the event that their data has been compromised.

We take many steps to ensure your private information and account credentials are safe, including encryption and requiring two-factor authentication for our staff. To this end, if you find a security problem, contact us and we will fix it immediately. Keep in mind, emails and communications with us are not encrypted. Therefore, you should take special care in deciding what information you send to us via email. Please keep this in mind when disclosing any Personal Data to Sanderland via the Internet.

We use physical, technical, and organizational security measures to safeguard your data from unauthorized or accidental disclosure. Despite these efforts, no information system can be 100% secure, so we cannot guarantee the absolute security of your information. Users also have a role to play in keeping their data safe. We encourage you to use a unique and hard-to-guess password for your account and to not share it with others. You should only grant access rights to people who you know and trust, and, even then, you should be careful in granting all access rights. You should monitor your account regularly. If you believe that someone has gained access to your account without your permission, please contact us immediately so that we can investigate.

Last updated: July 2025