

Privacy Notice GoodHabitiz Experts

1. About us

GoodHabitiz B.V. is established in the Netherlands and registered with the Chamber of Commerce under number 17217883. Where reference is made in this Privacy Notice to "we", "us" or "GoodHabitiz", this refers to GoodHabitiz B.V.

Our contact information is:

- GoodHabitiz B.V.
- Vincent van Den Heuvellaan 5
- 5612 MZ Eindhoven, Netherlands
- Support questions: support@goodhabitiz.com
- +31 (0)40 - 2 444 850
- www.goodhabitiz.com

You can also reach out to us via the contact form on our website.

When you use the GoodHabitiz Experts service, GoodHabitiz acts in different capacities.

1.1. GoodHabitiz as Controller

We act as a data controller for:

- **Admin account management:** When we provide login credentials and account access to administrators.
- **Service improvement, security&legal compliance, and analytics:** When we use data for our own business purposes such as data analysis and service improvement.
- **Operational data:** CRM data, billing information, customer relations. Refer to the general privacy notice at goodhabitiz.com for details on such processing.

1.2. GoodHabitiz as Processor

In case you received access to GoodHabitiz Experts via your employer or a company that uses our services, your employer (the organization that provides you access) is the controller of your personal data. GoodHabitiz B.V. acts as a processor, processing your personal data on behalf of and under the instructions of your employer/ the organization that provides you access. In some cases, other GoodHabitiz subsidiaries are involved in processing.



2. The GoodHabitiz Experts Service

Your employer / or organization with which you work has purchased access to our GoodHabitiz Experts service, which enables the creation and delivery of custom learning content through AI-assisted lesson creation tools.

This Privacy Notice applies to:

- Admins: Users who manage the service (where GoodHabitiz is the controller for account access)
- Other categories of users within the platform, such as end-users or experts who help create lessons and materials.

3. Why we process your data

We process your personal data for the following purposes:

3.1. When GoodHabitiz acts as Controller

- Providing and managing login credentials and account access for admins
- Ensuring Security and integrity: abuse prevention, backups, fraud prevention, business continuity
- Improving Service (restricted): aggregate/technical metrics to ensure performance/reliability, product improvement; no model training on customer data
- Ensuring Compliance: meet legal/regulatory and contractual obligations

3.2. When GoodHabitiz acts as Processor (on behalf of your employer/organization that provided access)

- Enabling account setup and role management for designated users
- Enabling AI-assisted lesson creation
- Allowing Service communications (invitations, notifications, completion emails)
- Providing Learning Management features: Tracking lesson completion and progress, providing dashboards.

4. Personal Data that we process

- **Email address** (required for authentication),
- **Name and other biographical data for the platform** (optional)
- **Technical data** (timestamps, IP address, other technical identifiers)
- **For experts** – chat logs with AI tools (for lesson creation), Videos and audio recordings created for lessons, lesson drafts and other content interactions
- **For learners** – lesson completion status (pass/fail), progress data, and other course completion information.



5. Lawful basis for processing

We rely on legitimate interest as a lawful basis when processing personal data of end-users.

Note: When we use data for our own analytical or service improvement purposes, we ensure appropriate safeguards including data minimization and anonymization.

6. Protecting Your Data

GoodHabitiz is certified under:

- ISO 27001:2022 (Information Security Management)
- ISO 27701: 2019 (Privacy Information Management).

For more, please refer to compliance page of GoodHabitiz (<https://www.goodhabitiz.com/compliance>)

7. Your Rights and how to exercise them

You have rights related to your personal data that we have about you:

7.1. When GoodHabitiz acts as a data controller

You can exercise your rights directly with us.

- Right to access: Request information about your personal data
- Right to rectification: Request corrections to inaccurate data
- Right to erasure: Request deletion (subject to legal requirements)
- Right to restriction: Request limitation of processing
- Right to object: Object to processing based on legitimate interests
- Right to data portability: Request transfer of your data

Contact: Dpo@goodhabitiz.com

7.2. When GoodHabitiz acts as processor

Contact your employer's designated administrator for data subject requests. Some rights you may exercise directly via our platform (for example, you may see an option to edit your name in settings or option to download data).

Alternatively, you can always email us at dpo@goodhabitiz.com and we will coordinate with your employer or assist ourselves, where possible.



8. Sharing your Personal Data

8.1. Your employer. As a data processor, we share learning data with your employer, such as learning progress and completion data; analytics and usage reports. If you are an expert, a party who invited you to create a lesson may have access to lesson drafts.

8.2. Our sub-processors.

We share end-user data with our vetted processors as governed by our data processing agreements. Our primary sub processors are:

- **AWS:** Cloud hosting and infrastructure (EEA-based); including Anthropic (via AWS Bedrock): AI processing for content generation (does not retain data) and SES emailing service (via Amazon).

International transfers: All your data processed during the use of GoodHabitiz Experts remains in the EEA

9. Retention Periods

All user data is anonymized 12 months after the end of the contract with the customer, unless another term is agreed in such contract.

Certain data may be retained longer for us as data controller, for example, support tickets that are used for service improvements.

10. Profiling

We do not use personal data for automated decision making that would affect a data subject.

When we act as a data controller for analytical purposes, we may analyze usage patterns to improve our services, but this does not result in automated decisions affecting individual users.

11. Changes to the Privacy Notice

We may update this Privacy Notice from time to time. Material changes will be communicated actively. The most recent version is always available in our website footer.