

Privacy Policy

This is the Privacy Policy ('Policy') for the website http://www.ibr-network.com, which is run and provided by IBR Institute of International Business Relations GmbH, a company registered in Germany at Amtsgericht Stuttgart HRB 764590 with a registered office at Im Neuen Bühl 7, 71287 Weissach-Flacht. Email: service.centre@ibr-network.com ("IBR", 'we', 'us', 'our'). Our VAT number is DE 200575226. IBR has been exempted from VAT based on § 4 Nr. 21 a UStG (VAT law in Germany) in June 2023.

We understand that studying in one of our study programmes and becoming an alumnus involves significant trust on your part. We value your trust and make it a high priority to ensure the security and confidentiality of the personal information you provide to us. Please read this policy to learn about our privacy practices. By visiting this website, you are accepting the practices described herein.

1. Summary of our processing activities

Generally, IBR collects customer data either directly from you i.e., through our website or from publicly available sources. The following summary provides you with a quick overview of the processing activities that are undertaken on our website. You will find more detailed information under the indicated sections below.

- When you visit our website for informational reasons without setting up an account, no personal data will be processed to provide you with the website itself (see 3).
- In case you register for one of our study programmes further personal data will be processed related to your studies and becoming an alumnus (see 4, 5 and 6).
- Your personal data may be disclosed to third parties (see 9) that might be located outside your country of residence. We have implemented appropriate safeguards to secure your personal data (see 10) and retain your personal data only as long as necessary (see 11).
- Under the legislation applicable to you, you may be entitled to exercise certain rights regarding the processing of your personal data (see 12).

2. Definitions

- **Personal Data:** means any information relating to a natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, or an online identifier.
- **Processing**: means any operation which is performed on personal data, such as collection, recording, organisation, structuring, storage, adaptation or any kind of disclosure or other use.

3. Informational use of the website

When you visit our website for informational reasons, i.e., without registering for one of our study programmes, we do not collect any information about you.

4. Registration for one of our study programmes

To register for one of our study programmes, you have to set up an account. Regarding the registration of an account and its subsequent use, we process:



- Information (such as your name, country and email address) that is provided by registration.
 - Information in connection with an account sign-in facility (e.g. log-in and password details)
 - Communications sent by you (e.g., via e-mail, WhatsApp, or Telegram)

Whilst you are studying in our study programmes or being an alumni further data processing processes may take place. We will process the personal data you provide to:

- Identify you at sign-in
- Provide you with the information related to your studies or being an alumnus or which, you request.
- Administer your account.
- Communicate with you.

For this, the legal basis is Article 6 sec. 1 sent. 1 lit. b GDPR. Your personal data is, in the absence of exceptions within the specific services mentioned below, retained for as long as you are enrolled in one of our study programmes and wish to be an alumnus. After deletion of your account, your personal data will be erased 1 month later. Statutory storage obligations or the need for legal actions that may arise from misconduct within the services or payment problems can lead to a longer retention of your personal data. In this case, we will inform you accordingly.

5. Information about the specific uses that require registration

For the studying in one of our study programmes you have to set up an account as described under 4. Your customer account retains your personal data for your studies, being an alumnus and other activity. You can delete the personal data as well as the account in your account's settings. This processing is based on Article 6 sec. 1 sent. 1 lit. b.

By statutory law we are required to retain the provided financial data in relation to transactions (including address, payment, and order information) for 10 years. However, after 2 years we will restrict the processing of your personal data to comply with the statutory requirements and will not process the personal data any further. Regarding this, the retention of your personal data is based on Article 6 sec. 1 sent. 1 lit. c GDPR.

6. Automated decision making

We do not use your personal data for automated decision making which produces legal effects concerning you or similarly significantly affects you.

7. Analysis

For statistical analyses we don't use web analytics services to collect information about the use of this site.

8. Third Party Content and social media plug-ins

YouTube: We use YouTube service to play videos directly from our website. This processing is based on Article 6 sec. 1 sent. 1 lit. f GDPR and represents our legitimate interest to improve your website experience and to optimize our services. Your browser will directly communicate with YouTube, LLC: 901 Cherry Ave., San Bruno, CA 94066, USA. We do not have any influence on You Tube data



processing activities. Please check <u>YouTube privacy policy</u> for further information here. Here you can find information about your rights and privacy settings.

Links to third party websites: This website may contain links to third party websites. We are not responsible for the content and the data collection on respective third-party websites; please check the privacy policy of respective websites for information of respective websites' data processing activities.

9. Information sharing

Your personal data will only be disclosed to a third party to the extent necessary to fulfil our contractual relationship. Legal basis for the transfer of your personal data is Article 6 sec. 1 sent. 1 lit. b and f GDPR and represents our legitimate interest to implement our general terms and conditions of business or any other agreements concluded with you.

10. Security

We have reasonable state of the art security measures in place to protect against the loss, misuse, and alteration of personal data under our control. For example, our security and privacy policies are periodically reviewed and enhanced as necessary and only authorised personnel have access to personal data. Whilst we cannot ensure or guarantee that loss, misuse, or alteration of information will never occur, we use all reasonable efforts to prevent it. You should bear in mind that submission of information over the internet is never entirely secure. We cannot guarantee the security of information you submit via our website whilst it is in transit over the internet and any such submission is at your own risk.

11. Data retention

IBR will retain your data for as long as it is necessary to fulfil the purpose for which it was collected, the legal or business purposes of IBR, or as required by relevant laws.

When destroying customer data, IBR will take commercially reasonable and technically possible measures to make the personal information irrecoverable or irreproducible in accordance with the applicable laws and the data subject has the right to be forgotten.

12. Your rights

Under the legislation applicable to you, you may be entitled to exercise some or all the following rights:

- require (i) information whether your personal data is retained and (ii) access to and/or duplicates of your personal data retained, including the purposes of the processing, the categories of personal data concerned, and the data recipients as well as potential retention periods.
- request rectification, removal or restriction of your personal data, e.g. because (i) it is incomplete or inaccurate, (ii) it is no longer needed for the purposes for which it was collected, or (iii) the consent on which the processing was based has been withdrawn;
- refuse to provide and without impact to data processing activities that have taken place before such withdrawal – withdraw your consent to processing of your personal data at any time.



- object, out grounds relating to your particular situation, that your personal data shall be subject to a processing. In this case, please provide us with information about your particular situation. After the assessment of the facts presented by you, we will either stop processing your personal data or present you our compelling legitimate grounds for an ongoing processing; and/or
- take legal actions in relation to any potential breach of your rights regarding the processing of your Personal data, as well as to lodge complaints before the competent data protection regulators.
- require (i) to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and (ii) to transmit those data to another controller without hindrance from our side; where technically feasible you shall have the right to have the personal data transmitted directly from us to another controller.
- not to be subject to any automated decision making, including profiling (automatic decisions based on data processing by automatic means, for the purpose of assessing several personal aspects) which produce legal effects on you or affects you with similar significance.

You may (i) exercise the rights referred to above or (ii) pose any questions or (iii) make any complaints regarding our data processing by contacting us under the contact details set out below.

13. Contacting us

Please submit any questions, concerns, or comments you have about this privacy policy or any requests concerning your personal data by email to our service team at service.centre@ibr-network.com

14. Amendments to this Policy

We reserve the right to change this Policy from time to time by updating our website respectively. Please visit the website regularly and check our respectively current privacy policy. This policy was last updated on June 22nd, 2023.