

## General Privacy Notice: Version 1. Effective 01.06.2023

### 1. About us

The controller of your personal data is Sixty Learn Ltd, (jointly with its subsidiaries, where applicable), established in the United Kingdom and registered with Companies House (Company Number 13880720). Where reference is made in this Privacy Notice to “we”, “us” or “Sixty”, this refers to Sixty Learn Ltd. and its subsidiaries, as applicable.

Our contact information:

Sixty Learn Ltd  
20 Commerce Road,  
Lynch Wood,  
Peterborough  
PE2 6LR  
United Kingdom  
[hello@sixtylearn.com](mailto:hello@sixtylearn.com)  
[www.sixtylearn.com](http://www.sixtylearn.com)

For specific privacy related questions or to contact our Data Protection Officer please send an email to: [hello@sixtylearn.com](mailto:hello@sixtylearn.com).

### 2. Introduction

In this General Privacy Notice, we provide information about how we handle your personal data when you visit us at [www.sixtylearn.com](http://www.sixtylearn.com), register for our online and in-person events, get (direct) marketing updates from us, such as newsletters or are a part of a marketing campaign, such as a giveaway.

This General Privacy Notice does not cover:

- Cookies and other technologies:
  - o See our Cookie Notice at the footer of our website [www.sixtylearn.com](http://www.sixtylearn.com)
- Our web-application based learning platform:
  - o If you have an account on our web-application based learning platform, or have access to our training or assessments in any other way, you can find more information on privacy at the footer of the web-application at [www.app.sixtylearn.com](http://www.app.sixtylearn.com)

### 3. Why we process your data

We use your personal data for several different purposes. Please note that depending on your interaction with us, not all purposes will apply. In short, our purposes are centred around marketing & operating our business. More specifically, we might use your personal data for the following purposes:

- Managing our website
  - o Sharing general information about us on our website
  - o Securing and improving our website
- Providing materials
  - o Providing you with downloadable materials
  - o Offering registration forms for our events
- Communication with you
  - o Responding to your requests by telephone or email
  - o Managing your (potential) commercial relationship with us (for example sending a personal message or material that may be of interest to you)
  - o Reaching out to you via newsletters or promotional emails
- Organising events or competitions

#### **4. Personal data that we process**

The personal data we process depends on the purpose

##### **4.1. Managing our website**

Based on your cookie preferences, when you visit the website, we also register your IP address, web-browsing behaviour, and whether and how you interact with our website. We use different methods to collect such information, including cookies. For more information on how we collect personal data when you visit our website, and to update your cookie preferences, please see our Cookie Notice (link available in the footer of our website).

##### **4.2. Providing materials on Sixty**

Based on your activity on our website, for example in case you choose to download any materials or register for any events, we might also process your:

- Name (first, middle, last)
- Email
- Phone number
- Company's name, size and branch
- Job function
- Language preference
- Any other information you provide in the fields as necessary.

##### **4.3. Communication**

When you reach out to us via phone, email, or a contact form, we process personal data about you in order to help you with your request, in particular: name, telephone number, email address, and the information that you may have shared with us.

If you are our contact person for your employer (who is our (potential) client or supplier), we also process your job title, your employer's name, branch and company size.

In most cases, you have provided this data yourself by downloading our materials, registering to our events, or otherwise staying in touch with Sixty. We may combine the information that you provided with other information sources, for example lead enrichers, or public data about your employer.

When you sign up to get our newsletter, we process the following:

- Name (first, middle, last)
- Email
- Phone number
- Company's name, size and branch
- Job function
- Language preference
- Newsletter opt-in.

You can always opt-out of communication. In that case, we will ensure you will no longer be contacted.

#### **4.4. Organising giveaways**

Some giveaways may be hosted via our website [www.sixtylearn.com](http://www.sixtylearn.com). In other cases, you be able to be part of giveaways and promotions in person. For giveaways and promotions, we process (at most) the following personal data:

- Name
- Telephone
- Email
- Address.

With your participation for the giveaway, you may also have an option to subscribe to our newsletter. Subscribing to the newsletter is optional and does not influence your chances at winning the prize.

#### **5. Lawful basis for processing**

We rely on the following lawful basis when processing your personal data:

##### **5.1. Consent**

In some cases, we rely on your specific consent to process certain personal data, such as for sending you a newsletter. You may withdraw your consent at any time by, for instance, clicking a footer at the end of the newsletter sent to you, or by contacting us at [hello@sixtylearn.com](mailto:hello@sixtylearn.com).

## 5.2. Performance of a contract

In some cases, we process your personal data for the performance or the preparation of a contract with you. This will be the case when you participate in a giveaway, and when you request a demo account, or contact us with a question.

In certain cases, registering for a marketing activity (e.g. an event) may be considered an agreement that requires us to process certain personal data about you in order to allow your participation.

## 5.3. Legitimate interests

We will process your personal data if this is necessary for our legitimate interest in relation to:

- Our business operations (and their optimization)
  - o In particular, when you are our contact person for the use of the Learning Platform or one of our suppliers
- Managing of (potential) commercial relationship
- Securing and improving the website
- The optional fields on the website forms.

We keep the data of the users who clicked “unsubscribe”, or “do not contact me”, or otherwise opted out from marketing communication with us in order to ensure that such people are no longer contacted by us.

## 6. Protecting your data

We aim to protect your personal information through a system of organisational and technical security measures.

We have implemented appropriate technical and organisational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure.

We therefore cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will not be able to defeat our security, and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access our website and learning platform within a secure environment.

## 7. Your rights and how to exercise them

You have rights related to your personal data:

- Right to access and right to data portability;
- Right to rectify your personal data
- Right to delete your personal data
- Right to restrict processing of your personal data
- Right to object to our processing of your personal data
  - o In particular, you always have the right to object to our processing of your personal data for purposes of direct marketing.
- Right to withdraw your consent.

To exercise your rights or ask specific privacy related questions, please reach out to [hello@sixtylearn.com](mailto:hello@sixtylearn.com). If you are not satisfied with the way we handle your complaint or request, you can make a complaint to the data protection authority.

## 8. Sharing your personal data

Naturally, we limit sharing your personal data as much as possible. However, sometimes it is necessary to share your personal data. We may share your personal data:

- With our service providers, including a client relationship management system and marketing system processors.
- If you would like to know more about this, please contact us at [hello@sixtylearn.com](mailto:hello@sixtylearn.com).

## 9. Retention periods

Different types of personal data have different types of retention periods. Below you will find a table with the different retention periods. Some general guidelines:

- If a piece of personal data falls within multiple categories, the personal data will be stored according to the longest retention period
- After a retention period runs out, we will delete your personal data
- These retention periods below are the maximum periods for keeping your personal data
- Sometimes there are reasons why we will delete your personal data earlier, for instance if the personal data is no longer relevant.

<b>Reason for storing data</b>	<b>When data is removed</b>
Managing our website	See our Cookie Notice
Giveaways	After the giveaway ends
Newsletters	When you unsubscribe. Your data will be added to an opt-out list
Downloading material from our website	3 years after our last contact moment with you
Communication	3 years after our last contact moment with you
Attending events	3 years after our last contact moment with you

## **10. Profiling**

We do not use your personal data for automated decision making.

## **11. Changes to the Privacy Notice**

We may change this Privacy Notice from time to time. The most recent version of this Privacy Notice is always available on our website. You can find it in the footer on every page. If we make any material changes, we will share this via our website. The effective date is at the top of this document.