

PRIVACY POLICY

1. OVERVIEW

Lørn AS (hereinafter "Lørn", "we" or "us") is a Norwegian platform offering knowledge-based podcasts and courses within various topics to you as a private customer or personnel of a business customer (hereinafter the "Customer" or "you").

Lørn acts as the data controller for any processing of personal data in connection with providing you information on our webpage, and providing you with a user profile which offers you access to our products and services (hereinafter the "Services").

This privacy policy (hereinafter the "Privacy Policy") describes how we process your personal data, and what rights you have pursuant to Norwegian data protection regulations, including the General Data Protection Regulation (GDPR), and the Norwegian Personal Data Act.

2. WHEN, WHY AND WHAT TYPE OF DATA DO WE COLLECT?

2.1. General

We process your personal data to be able to provide you with our Services. When you visit our webpage, sign-up for newsletters and when you create a user profile and use our products, we process the following personal data:

- IP address, and information regarding your visit;
- Any comments left in the contact form as a visitor;
- Contact information (such as name, user name, address, phone number, photos and e-mail);
- Payment details and purchase history;
- Education or work place;
- Communication with us;
- Any information regarding personal preferences that you choose to share with us; and
- Information regarding any podcasts you have listened to and any courses you have signed up for.

We collect and process this personal data to be able to provide you with a contractual service (ref. GDPR art. 6(1) letter b), to uphold our legitimate interest in providing you with the best experience possible in relation to our webpage information and provided services, and to uphold our legitimate interest in processing any legal claims (ref. GDPR art. 6(1) letter f), as well as for compliance with our legal obligations (ref. GDPR art. 6(1) letter c).

We do only process your personal data to the extent that it is necessary for the performance of our Services. Below we have listed all our specific purposes, including how we collect your personal data, what categories of personal data we typically process, as well as the legal basis for such processing.

2.2. Website

We collect certain information from your computer or internet connection when you visit our website and use our digital services, such as your IP-address, date and time of your visit, duration of your visit, content of your request (such as the specific site/page you visit), the website you were referred from, which pages you visit on our website, your internet service provider, your browser type and version, as well as your operating system.

We collect this information to uphold our legitimate interests in being able to display our website to you, measuring and improving the performance of our digital channels, as well as marketing our products and services (ref. GDPR art. 6(1) letter f).

2.3. Creating an account and using our products and services

When you or your employer register for a user account on our platform, Lørn.University, and when you log in to this account to access our podcasts and courses, we process personal data about you. Such personal data includes your name and user-name, address, e-mail, phone number, photos, company information, payment information, purchase history, communication with us, information regarding any podcasts you have listened to and any courses you have signed up for, as well as any other personal information you choose to provide us with or which you have provided to your employer for this purpose.

We process this personal data to be able to provide you with the contractual service (ref. GDPR art. 6(1) letter b), and to uphold our legitimate interest in providing you with the best experience possible in relation to our products and services (ref. GDPR art. 6(1) letter f). In some cases, we are also compelled to process your personal data for compliance with a legal obligation, such as compliance with the Norwegian Bookkeeping Act (ref. GDPR art. 6(1) letter c), or to uphold our legitimate interest in processing any legal claim (ref. GDPR art. 6(1) letter f).

2.4. Contact form

You may wish to contact us with questions or requests. When you contact us, either by filling out our contact form or my other means, you may provide us with information about you or your company. Upon doing so, we collect the information provided by you, such as: name, e-mail, phone number, company information, your location, as well as any other information that you enter into the form.

We collect this information to be able to carry out our contract with you (ref. GDPR art. 6(1) letter b) or to uphold the legitimate interest we have in replying to your requests or questions (GDPR art. 6.1 f).

2.5. Newsletters and service updates

[If you subscribe to our newsletter and information on our service updates, we collect your name and e-mail address. If you are an existing customer or user, we may also send you any necessary information even though you do not expressly subscribe.

The legal basis for sending such e-mails to our existing customers is to uphold our legitimate interest in following up our customers by providing relevant news and relevant information about our services (ref. GDPR art. 6(1) letter f, see also the Norwegian Marketing Act art. 15(3)). If you are not an existing customer or user, the legal basis for sending such e-mails would be your express consent (ref. GDPR art. 6(1) letter a).

Anyone receiving the information items above can easily opt out using the link included in our e-mails.]

2.6. Applying for a position with us

You are welcome to apply for a position with us. If you decide to do so, we will ask you to provide certain categories of personal data:

- Basic information: e.g. name, date of birth, sex and nationality;
- Contact information: e.g. your address, e-mail and phone number;
- Qualifications: e.g. your CV, application, diplomas and transcripts of records, language knowledge, courses, certifications and any other information you provide us with in your application or interviews with us;
- Background information: e.g. information provided to us by your references, which we either collect through official sources or through references you provide us with; and
- Our assessments: i.e. assessments and comments we make in relation to our internal assessment of your application.

You provide us with such personal information, as well as any other information that you might choose to share with us in this respect, on a voluntary basis. We will collect and process this information in order to respond to your application and to consider whether to enter into an employment contract with you (ref. GDPR art. 6(1) letter b). We will delete the information related to your application as soon as it is no longer relevant for this purpose.

2.7. Visits to our social media pages

When you visit our social media pages, such as our Facebook and LinkedIn pages, the social media providers will collect and process your personal data and use cookies. For information about how these providers use your personal data, we recommend that you read their privacy policies.

2.8. Support

When you submit a support ticket to us, we will collect and process your name and contact details, as well as your description of the problem you are experiencing.

We collect and process this information to be able to provide you with a service according to our contract (ref. GDPR art. 6(1) letter b) and to uphold our legitimate interest in improving our service to you (ref.

3. DO WE SHARE YOUR PERSONAL DATA WITH THIRD PARTIES?

We will not share your personal data with others unless you either give us your consent to do so (ref. GDPR art. 6(1) letter a), or if we have another legal basis to share your data, e.g. if it is necessary to provide you with a contractual service (ref. GDPR art. 6(1) letter b), if we are required by law to disclose your personal data (ref. GDPR art. 6(1) letter c), or it can be justified on the basis of our legitimate interest in doing so (ref. GDPR art. 6(1) letter f).

In relation to our customers holding an account with us, we share required personal data with our accounting provider, as well as Stripe (www.stripe.com) as our payment gateway.

When we use third party sub-contractors or service providers in order to provide our services, we will take appropriate legal precautions and corresponding technical and organisational measures in order to ensure that your personal data are protected in

accordance with applicable data protection law. Our service providers may be based in locations all over the world. This means that your personal data may be transferred outside the EU/EEA. If that is the case, we will implement appropriate security measures to protect your data such as agreements with EU standard contractual clauses.

4. HOW DO WE PROTECT YOUR PERSONAL DATA?

Both our data processors and we have implemented appropriate technical and organizational measures to ensure a sufficient level of security when processing your personal data and to prevent loss or unlawful processing. Such measures are, for example, internal routines, data processing agreements and IT-security procedures to verify access rights. We will also carry out data protection impact assessments when it is likely that processing of your data may result in a high risk with respect to your rights and freedoms in relation to your personal data.

5. HOW DO WE USE COOKIES?

Cookies are small text files that are saved on your hard drive and associated to your browser and which provide us with information. They serve to make our web-services more user-friendly and efficient. We use cookies and similar technology to store your website preferences, combat fraud and illegal activity, analyse our services, improving our website and to fulfil other legitimate purposes. For these purposes, we use both necessary cookies and functional cookies.

If you leave a comment on our web site you may opt-in to saving your name, email address and website in cookies. These are for your convenience so that you do not have to fill in your details again when you leave another comment. These cookies will last for one year.

If you visit our login page, we will set a temporary cookie to determine if your browser accepts cookies. This cookie contains no personal data and is discarded when you close your browser.

When you log in, we will also set up several cookies to save your login information and your screen display choices. Login cookies last for two days, and screen options cookies last for a year. If you select «Remember Me», your login will persist for two weeks. If you log out of your account, the login cookies will be removed.

If you edit or publish an article, an additional cookie will be saved in your browser. This cookie includes no personal data and simply indicates the post ID of the article you just edited. It expires after 1 day.

If you do not want cookies to be stored on your equipment, you can turn off cookies in your browser. However, our websites will have reduced functionality if you turn off cookies.

We also use Google Analytics for statistical purposes. These statistics use information about your visit and usage patterns on our website (such as how often you visit our website as well as what specific pages you visit, the length of your visit, your geographical location when visiting us and more). Google Analytics collects the IP-address you use on the date you visited our website and anonymize your data before sharing it with us. Google Analytics does not collect your name or other personal data. We do not combine information collected by Google Analytics and other personally identifiable information.

We use necessary, functional and analytical cookies (via Google Analytics) on our website. Some of those cookies are persistent, which means that they will be stored on your electronic device when you leave our website for a restricted period of time. For session cookies, those are deleted as soon as you leave our website.

You may opt out of collection and analysis of data collected through Google Analytics by downloading Google Analytics' opt-out browser add-on here: <https://tools.google.com/dlpage/gaoptout>.

If you have a Google Account, you may alter your personal advertisement settings here: <https://myaccount.google.com/?pli=1>.

You may find more information on Google's advertisement services here: <https://safety.google/privacy/ads-and-data/>.

You can also configure your browser settings for other type of cookies, for instance by refusing to accept cookies.

6. WHAT ARE YOUR RIGHTS?

You have several rights under the applicable data protection regulations. We have provided a list of the rights you can exercise in your relationship with us as a data controller below. If you wish to exercise your rights, please contact us and we will respond to your inquiry as soon as possible, but no later than a month after the receipt of your enquiry.

- **Access:** You have a general right of access to the personal data we have registered about you.
- **Rectification and erasure:** You have a general right to request that we should rectify any incorrect personal data about you and erase personal data about you. Please note that personal data that is essential to the customer relationship with us cannot be deleted, unless you also explicitly request termination of the customer relationship with us.
- **Restriction:** You have a general right to ask us to stop ("freeze") the processing of your personal data, e.g. where you are of the opinion that we process personal data about you illegally and you do not wish us to erase these data pursuant to our routines for such erasure until the matter has been clarified.
- **Data portability:** You have a general right to request transfer of your personal data in a common, machine-readable format.
- **Objection:** You have a general right to object to our processing of personal data about you if this is justified by special circumstances on your part.
- **Right to appeal:** If you do not agree with the way in which we process your personal data, you may submit an appeal to the Norwegian Data Protection Authority (Datatilsynet). We ask that you contact us beforehand, so that we may clarify any misunderstandings.
- **Withdraw your consent:** If our processing of personal data is based on your consent, you have the right to withdraw your consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

7. HOW LONG DO WE STORE YOUR DATA?

Your personal data will not be stored for longer than needed for the purposes mentioned in this Privacy Policy. This means that when our customer relationship with you is terminated, we will erase your personal data as soon as our purpose with processing such data is no longer relevant, unless we are compelled by law to store this data any longer.

8. DO WE KEEP THIS POLICY UP TO DATE?

Yes. We may amend this Privacy Policy from time to time. You will be notified if we make any significant changes. The most up-to-date version of our privacy policy is available on our website.

9. HOW CAN YOU CONTACT US?

Please contact us if you have any questions or comments or if you wish to exercise your rights. Our contact details are:

contact@learn.tech