

PRIVACY STATEMENT - 2LEARN

1 WHY THIS PRIVACY STATEMENT?

Every person (hereafter the “User”) who visits or uses the website [<http://www.vettube.eu> / www.neoanimalia.be / www.neoanimalia.eu] discloses a certain amount of personal data. The personal data is information which allows 2LEARN to identify you as a natural person, regardless of whether we actually do this. You are identifiable as soon as it is possible to create a direct or indirect link between one or more data and you as a natural person.

With this Privacy Statement, we want to inform you as well as possible about the way in which we collect your personal data and about the purposes for which we use those personal data.

We only use and process your personal data in accordance with the Privacy Law and the other applicable regulations. Every reference in this Privacy Statement to the ‘Privacy Law’ is a reference to the *Belgian Act of 8 December 1992 on Privacy Protection in relation to the Processing of Personal Data*. Every reference to the Regulation is a reference to the *Regulation of 27 April 2016 on the Protection of Natural Persons with regard to the Processing of Personal Data and on the Free Movement of such Data (GDPR)*.

By using our Website, the User declares having read this Privacy Statement and explicitly agrees to the possible collecting and processing of personal data as described in this document. 2LEARN reserves the right to modify this Privacy Policy at all times. Every substantial change will be clearly communicated towards the User. We advise you to consult this document regularly.

2 WHO IS RESPONSIBLE FOR THE PROCESSING OF PERSONAL DATA?

2.1. DATA CONTROLLER

With regard to our website [<http://www.vettube.eu> / www.neoanimalia.be / www.neoanimalia.eu], 2LEARN is considered to be the data controller of your personal data. 2LEARN decides alone or in cooperation with others which personal data are being collected as well as the purposes and the technical and organisational means with regard to the processing of those personal data.

Contact details:

2Learn SA (hereafter “2Learn” and “Us”)

Grand-Route 63/5

B-5380 Hingeon

Belgium

BTW BE : 0811 635 523.

E-mail : info@2learn.pro

Tel. : +32 (0)81 24 50 90

2.2. DATA PROCESSOR(S)

2LEARN is free to rely on data processors. A data processor is the natural or legal person who processes your personal data upon request and on behalf of the data controller. The processor is required to ensure the security and confidentiality of the data. The processor shall always act on the instructions of the data controller. In any case, your personal data will only be used in order to perform the services for which we rely on our processors.

2LEARN relies on the following categories of "processors":

- Web development agencies and hosting companies;
- External payment service providers;
- Target audience analysis and statistical analysis services.

3 ON WHAT LEGAL GROUNDS ARE MY DATA PROCESSED?

In accordance with the Regulation we process personal data on the following legal grounds:

- On the basis of the execution of the contract agreed upon with you and on the basis of your permission for everything relating to the use of our website and the provision of our services;
- On the basis of the execution of the contract and on the basis of our legal obligations for everything relating to the management of the contractual relationship and invoicing.;
- Based on your permission to share your information with our business partners;
- Based on your explicit consent to the sending of promotional offers (direct marketing).

4 WHICH PERSONAL DATA ARE BEING PROCESSED?

2LEARN commits to only collect and process your personal data which are necessary for achieving the purposes pursued by 2LEARN. A list of the personal data that are processed by 2LEARN can be found here:

- Surname, first name and contact details;
- Email address and password;
- Phone number;
- Occupation, status and sector of activity;
- School;

- Serial number of veterinarians;
- National registration number;
- Date of birth;
- Gender;
- Nationality;
- Language;
- Bank details;
- Information about your connection (IP address, location, etc.).

Other personal data may be collected at a later date, for example when you call upon our support service or in the event of questions or complaints. The amount of data collected depends on the behaviour of the User on the website.

We also use cookies in order to recognise the User and to offer the User a personalised user experience, to remember technical choices (e.g. language choices), and to detect and correct any errors which might be present on the Website. For more information concerning the use of cookies, we kindly refer you to our Cookie Statement.

5 FOR WHICH PURPOSES ARE MY PERSONAL DATA BEING USED?

2LEARN collects your personal data for the sole purpose of offering every User of our a safe, optimised and personal user experience. The processing of your personal data is thus essential for the proper functioning of the website and the provision of the associated services. If these data are missing, are incorrect or incomplete, 2LEARN reserves the right to suspend or cancel certain operations.

2LEARN commits to solely process your personal data for the following purposes:

- To offer the User the possibility to register on the website, to give the User access to his user profile and to allow the User to use the functionalities of the website;
- The follow-up and payment of your subscription;
- Managing all aspects of the contractual relationship between 2LEARN and the User;
- To offer the User a personalised service, in particular by providing support and following up complaints.
- Detecting fraud, error and criminal behaviour in order to protect the User.
- Sending newsletters and advertisements (direct marketing) if you have expressly agreed to this. In that case, you are free to withdraw your consent at any time.

6 WHO RECEIVES YOUR PERSONAL DATA?

Your personal data will in the first place be processed for internal use within 2LEARN. In addition to 2LEARN and the 2LEARN personnel, your personal data may be shared with:

- Our data processors (see point 2.2.);
- Some of our partners, such as associations, schools or organisations with whom we occasionally work, in order to offer you a discount or preferential rate;
- The government, in order to comply with our legal obligations, such as the Walloon Region for the allocation of training cheques/SME portfolio and the Order of Veterinarians for the transfer of Approved Training Points (French: "PFCC", Dutch: "EBP").

Your personal data may also be passed on to our business partners if you have expressly consented to this when registering on our website.

2Learn is a Belgian company. Nevertheless, your personal data may be processed and/or passed on to countries outside the European Union. 2Learn will ensure that all transmissions of personal data take place in accordance with the Regulation.

7 HOW LONG DO WE STORE YOUR PERSONAL DATA?

Your data is stored as long as necessary to achieve the ends pursued. They will be erased from our database as soon as they are no longer necessary for the ends pursued or if you validly exercise your right to erasure.

8 WHAT ARE MY RIGHTS?

8.1 Guarantee of a legitimate and secure process of your personal data

Your personal data are always processed for the legitimate purposes explained in point 5. They are collected and processed in an appropriate, relevant and non-excessive manner, and are not kept longer than necessary to achieve the intended purposes.

8.2 Right to access

If you can prove your identity, you have the right to obtain information about the processing of your data. Thus, you have the right to know the purposes of the processing, the categories of data concerned, the categories of recipients to whom the data are transmitted, the criteria used to determine the data retention period, and the rights that you can exercise on your data.

8.3 Right to rectification of your personal data

Inaccurate or incomplete personal data may be corrected. It is primarily the responsibility of the User to make the necessary changes in his "user area" himself, but you can also request us in writing.

8.4 Right to erasure (or "right to be forgotten")

You also have the right to obtain the erasure of your personal data under the following assumptions:

- Your personal data are no longer necessary for the intended purposes;
- You withdraw your consent to the processing and there is no other legal ground for processing;
- You have validly exercised your right of opposition;
- Your data has been illegally processed;
- Your data must be deleted to comply with a legal obligation.

The deletion of data is mainly related to visibility; it is possible that the deleted data are still temporarily stored.

8.5 Right to limitation of processing

In certain cases, you have the right to request the limitation of the processing of your personal data, especially in case of dispute as to the accuracy of the data, if the data are necessary in the context of legal proceedings or the time required to 2LEARN to verify that you can validly exercise your right to erasure.

8.6 Right to object

You have the right to object at any time to the processing of your personal data for direct marketing purposes. 2LEARN will stop processing your personal data unless it can demonstrate that there are compelling legitimate reasons for the processing which prevail over your right to object.

8.7 Right to data portability

You have the right to obtain any personal data which you have provided us in a structured, commonly used and machine readable format. At your request, this data may be transferred to another provider unless it is technically impossible.

8.8 Right to withdraw your consent

You have the right to withdraw your consent at any time, for example when you have given your consent for direct marketing purposes, as well as for the transfer of your data to our business partners or for sending newsletters.

9 HOW TO EXERCISE MY RIGHTS?

If you wish to exercise your rights, you must send a written request and proof of identity by registered mail to 2Learn SA, Grand-Route 63/5, 5380 Hingeon (Belgium) or by email to info@2learn.copro. We will respond as soon as possible, and no later than one (1) month after receipt of the request.

10 POSSIBILITY TO LODGE A COMPLAINT

If you are not satisfied with the processing of your personal data by 2LEARN, you have the right to lodge a complaint with the competent Data Protection Authority (for Belgium: <https://www.privacycommission.be/>).

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