

A. Responsible Entity for Data Processing

The responsible entity for the processing of personal data in accordance with the provisions of the General Data Protection Regulation (GDPR) is:

Berlitz Deutschland GmbH
Hahnstrasse 68–70
60528 Frankfurt am Main, Germany
Phone: +49-69-666-089-0
Website: www.berlitz.de
E-mail: info@berlitz.de

Our Data Protection Officer: datenschutz@berlitz.de

This Privacy Policy informs you about the scope of the processing of your personal data (hereinafter "data").

B. Data Processing

We process data as part of our services. The data processing also includes disclosure by transmission. Data is also transferred to countries outside the EU/EEA area.

For data transfers to the USA, an adequate level of data protection is ensured by the use of EU standard contractual clauses.

When data is transferred to other third countries, an adequate level of data protection is ensured by the use of EU standard contractual clauses or in the form of an EU Commission adequacy decision for the country concerned.

The data concerned, processing purposes, legal bases, recipients, and transfers to third countries are listed below.

a) Data Processing While Carrying Out All Services

We process your name and contact details to identify you as a customer and to contact you. When you use our services, we also process your attendance or usage data, initial level assessment, learning progress, and survey results. For courses for children and adolescents, we also collect the year of birth in order to identify the corresponding program.

In the case of a service relationship billed on one's own behalf, we also process your address data and other data required for billing.

The data processing is carried out on the basis of **article 6, paragraph 1(b), of the GDPR** to fulfill the contract.

If you have been registered as a participant by your employer, the attendance or usage data, initial level assessment, learning progress, and survey results will be transmitted to your employer at the request of the employer. If your employer so wishes, additional data, such as department, cost center, position, and contact person on the employer's side, may be processed in order to improve the administration of the courses by the employer. This information is transmitted by your employer.

The legal basis for the transfer to your employer is the execution of your employment relationship in accordance with **article 88, paragraph 1, of the GDPR** and **article 26 of the German Federal Data Protection Act (BDSG)** in connection with the protection of our legitimate interests from the fulfillment of our contractual obligations with your employer in accordance with **article 6, paragraph 1(f), of the GDPR**.

If you consent, certain services may be executed through a virtual classroom. In this case, we use Zoom Video Communications Inc., San Jose, California, USA.

With the use of Zoom, various data is processed. The scope of the processed data depends upon the (optional) information the student provides while using Zoom.

Registration is not required, but the student may choose to register. In that case, name and e-mail address are processed.

Further information about the student (name, telephone number, e-mail address, password, profile picture) and metadata (topic, description of the students' IP addresses, device/hardware information) may be affected.

If you choose to connect by telephone, additional information regarding inbound and outbound telephone numbers, country name, start and end times, and, if applicable, call detail records, i.e. the device's IP address, may be processed.

If you, the student, use the chat, question, or survey functions of the service, your text input and data from your microphone and camera are processed.

In order to provide technical support, data regarding the students' Internet connection and the hardware used is processed.

The processed data is transmitted to a Zoom server in the USA. An adequate level of data protection is ensured by the use of standard contractual clauses between Zoom Video Communications Inc. and Berlitz Languages Inc. and between Berlitz Languages Inc. and Berlitz Deutschland GmbH.

The data processing is carried out for the fulfillment of the contract in accordance with **article 6, paragraph 1(b), of the GDPR**.

b) Programming Courses for Children and Adolescents

For the provision of our programming course offers, we use the services of external partners, who, on our behalf, process data (i.e. participant name, attendance, and activities) arising within the scope of our programming courses.

The data processing is carried out for the fulfillment of the contract in accordance with **article 6, paragraph 1(b), of the GDPR**.

c) Kids' Camp

Within the scope of participation in the Kids' Camp, we also process health data (e.g. illnesses or allergies) in order to ensure comprehensive care during the camp stay. This data processing is carried out with the explicit consent of the parents or guardians in accordance with **article 9, paragraph 2(a), and article 8, paragraph 1, sentence 2, of the GDPR**.

d) Berlitz Virtual Classroom

To ensure your learning success (extensive follow-up and the possibility to make up for missed lessons in group training), recordings of the lessons are made. In this case, we process the following data from you: video data, if your camera is turned on, audio data, and students' contributions in the chat window.

In order to provide this service, we use group-internal service providers for the administrative handling and execution of the lessons, to whom we provide the above-mentioned data. Data is also transmitted to the USA. Ensuring an adequate level of data protection is guaranteed by the EU Commission's standard data protection clauses. The data processing is carried out for the fulfillment of the contract in accordance with **article 6, paragraph 1(b), of the GDPR**.

e) CyberTeachers and Phone-/Skype Lessons

If you use our CyberTeachers and/or Phone-/Skype Lessons services, we use internal service providers for the administrative handling and execution of the lessons, to whom we transmit the data mentioned under B(a). Data is also transmitted to third countries. The use of standard EU contractual clauses will ensure an adequate level of data protection. The data processing is carried out for the fulfillment of the contract in accordance with **article 6, paragraph 1(b), of the GDPR**.

f) Cultural Navigator® and Cultural Orientation Indicator®

In addition to the data mentioned in B(a), we also process your location and your job function. Furthermore, the validity period of your license is stored. Upon your employer's request, this data will also be transferred to your employer.

As part of the Cultural Orientation Indicator®, we offer you the opportunity to analyze your own working preferences and cultural imprint. If you use this online tool, we also process the data you provide (language, role, location, sex, nationality, age group, and information on preferences in the work environment) in an evaluation.

In order to provide this service, we use group-internal service providers for the administrative handling and execution of the lessons, to whom we provide the above-mentioned data. An adequate level of data protection is ensured by the agreement to standard EU contractual clauses. The data processing is carried out in accordance with **article 6, paragraph 1(b), of the GDPR**.

If you decide to share the analysis with other users, the related data will be processed on the basis of your consent in accordance with **article 6, paragraph 1(a), of the GDPR**.

g) Berlitz Seminars eLearning

If you make use of our Berlitz Seminars eLearning offer, we process in addition to the data listed in B(a) further personal details (i.e. sex, address, telephone number, identification number), provided you make these available.

With use of Berlitz Seminars eLearning, additional data about your learning history and progress are processed. This data is processed in order to allocate and use personalized content, to document learning progress, to monitor training measures, and to make responses to interactive activities possible. In addition, data processing occurs in order to inform the participant about upcoming e-learning modules, completed e-learning modules, and, if applicable, certificates through personalized e-mails.

For the provision of our course offers, we appoint contractors, to whom we transmit the stated data and who, on our behalf, process this data.

The data processing is carried out for the fulfillment of the contract in accordance with **article 6, paragraph 1(b), of the GDPR**.

h) Integration Courses and Professional Language Courses in Accordance with the German Language Promotion Regulations

Within the framework of our integration courses and professional language courses in accordance with the regulation for the promotion of the German language, we also process the following data from you: date of birth, nationality, native language, address, education history, identification number of the responsible body, passport number, copy of the residence permit if applicable, notification of benefits from the responsible body of the basic benefits, and your bank details. We transmit the data, as well as attendance or usage data, initial assessment, and learning progress results, to the Federal Office for Migration and Refugees and, if necessary, to the provider of the basic social security benefits.

Data processing is carried out in accordance with **article 6, paragraph 1(c), of the GDPR** to fulfill our legal obligations under **article 8 of the Integration Course Ordinance** and **article 4, paragraph 5, and article 26 of the Ordinance on the Job-Related Promotion of German as a Foreign Language (DeuföV)**.

If you decide to take an exam, we will provide the following information to our audit provider: name, date of birth, nationality, sex, native language, and passport number.

This data transmission is based on your consent in accordance with **article 6, paragraph 1(a), of the GDPR**.

i) AZAV Courses (Ordinance on Accreditation and Admission Employment Promotion)

Within the scope of our AZAV courses, we also process the following data from you: date of birth, nationality, native language, address, start date of seeking work, customer number of the employment agency, training history and future professional fields, suitability for successful participation in the training measure, and successful integration six months after the end of the training measure.

Data processing is carried out in accordance with **article 6, paragraph 1(c), of the GDPR** in conjunction with **articles 183, 318, and 81 of the SGB III (German Social Code)** to fulfill the legal obligations.

C. Duration of Data Storage

We only store personal data for as long as necessary for the purposes for which they are processed. This is generally two years after the end of your course. If legal storage obligations have to be observed, the storage period for certain data can be up to ten years, irrespective of the processing purposes.

D. Your Rights as the Concerned Party

a) Information

Upon request, you will receive information about all the personal data that we have stored about you at any time and free of charge.

b) Correction, Deletion, Restriction of Processing (Blocking), Objection

If you no longer agree to the storage of your personal data or if it becomes incorrect, we will initiate the deletion or blocking of your data or make the necessary corrections (insofar as this is possible under the applicable law) upon instructions to this effect. The same applies if we are only to process data to a limited extent in the future.

c) Data Transmissibility

Upon request, we will provide your data in a common, structured, and machine-readable format, so that you can transfer the data to another person responsible if required.

d) Right of Appeal

You have the right of appeal to the competent supervisory authority: www.bfdi.bund.de/DE/Infotehk/Anschriften_Links/anschriften_links-node.html.

e) Right of the Revocation of Consent with Effect for the Future

You can revoke your consent at any time with effect for the future. Your revocation does not affect the legality of the processing until the time of the revocation.

f) Restrictions

Data for which we are not able to identify the person concerned, if anonymized for analysis purposes, for example, is not covered by the above rights. Information, deletion, blocking, correction, or transfer to another company with regard to this data may be possible if you provide us with additional information that leads to an accurate identification.

g) Exercising Your Rights

For questions regarding the processing of your personal data, information, correction, blocking, objection to or the deletion of data, or a request to transfer the data to another company, please contact datenschutz@berlitz.de.