

Schedule 3

User Privacy Notice: Version 3. Effective 19.06.2025.

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
www.sixtylearn.com

For specific privacy related questions or to contact our Data Protection Officer please send an email to: support@sixtylearn.com.

2. Our Learning and Onboarding Platform & further information

Your employer has purchased access to our online Learning and Onboarding Platform, which combines technology and tailored content to support onboarding, health & safety, skills development, and ongoing professional growth. Your employer decided who gets access and how you will be able to access the Learning and Onboarding Platform.

In this User Privacy Notice, we provide information about how we handle your personal data when you use our Learning and Onboarding Platform, and how we process your personal data on behalf of your employer.

This Privacy Notice also applies to the use of the Learning and Onboarding Platform via a demo account, or any other type of account.

You may also find useful:

- User Agreement
- General Privacy Notice
- Cookie Policy

3. Why we process your data

We process your personal data for the following purposes:

3.1. Learning and Onboarding Platform

- Provide access to the Learning and Onboarding Platform
- Creating PDF progress reports & certificates
- Ensuring and improving the security of the Learning and Onboarding Platform

- Helping your employer with the rollout of the Learning and Onboarding Platform in your organisation
- Sharing insights about your onboarding with your employer
- Sharing insights about your use of the Learning and Onboarding Platform with your employer
- Sharing insights about your professional development with your employer
- Sharing insights about your employment experience with your employer
- Adapting the Learning and Onboarding Platform to your personal preferences
- Improving our products

3.2. Communication with you

- Sending you:
 - o Access links to our onboarding and training content
 - o Nudges and reminders
 - o Personal messages
 - o Research requests or questionnaires
 - o Other messages or requests related to the provision of our Learning and Onboarding Platform.
- Handling your customer support requests and questions.

4. Personal data that we process

There are 3 categories of personal data that we can process from you:

4.1. Getting started with Sixty

We require the following personal data to give you full access to Sixty, including all features:

- Name
- Workplace and/or personal email address
- Phone number (optional)
- Password (hashed)
- User ID (a pseudonym provided by your employer)

Depending on the way your company implements the Learning and Onboarding Platform within your organisation, we may not need all these types of personal data. You can ask your employer which login method is used and what personal data is precisely shared with us.

In case your employer invites you via email, you will get an invitation from notifications@sixtylearn.com. This email contains an activation link for your account. We hash your password and store it on our system. We will use your email address and/or phone number as an identifier when logging into our website.

4.2. Using Sixty

When you complete our training, use our feedback collection tool, or use our nudge tool, we generate personal data about:

- Your learning progress:
 - o Your answers and responses
 - o Duration of use
 - o Progress

- Results
 - Date of account activation
 - Contents of feedback collected.
- Your web sessions:
 - Log times
 - Browser
 - Operating system
 - IP address.

4.3. Communicating with you

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

5. Lawful basis for processing

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

5.1. Performance of a contract

We process your personal data because of the User Agreement with you. The processing of your login information, progress data, nudges, and feedback happens for this reason. We also process your data to provide you with the customer support, answer any questions you may have, or provide any other assistance that you request.

5.2. Legitimate interests

We process the information to get you started with Sixty (see 4.1) (provided by yourself or your employer) based on the legitimate interest in order to allow you to access our Learning and Onboarding Platform. We also use your personal data to maintain and increase the security of our Learning and Onboarding Platform. We may also share some progress data and other information about Learning and Onboarding Platform usage with your employer for your employer's insights, but never more than indicated in this Privacy Notice.

6. Protecting your data

We aim to protect your personal information through a system of organisational and technical security measures. Part of our security measures are, for example, encryption, segregation of duties on the need to know basis, and backups.

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 and Onboarding Platform from within a secure environment.

7. Your Rights and how to exercise them

You have rights related to your personal data that we have about you:

7.1. Right to access your personal data and the right to data portability

- You can get information or copies of the personal data that we process about you.
- You can download your Learning and Onboarding Platform data using the “My Progress Report” button in the “Profile” section of your account. Alternatively, contact support@sixtylearn.com to request your Learning and Onboarding Platform data.

7.2. Right to rectify your personal data

- In case the personal data we process about you is inaccurate, you can rectify or correct it. You can modify your name, last name, email address, and phone number yourself via the Learning and Onboarding Platform.

7.3. Right to delete your personal data

- You can delete your personal data from the Learning and Onboarding Platform by contacting your employer to request to delete your account. Please note that in case you exercise this right, your employer may invite you to the Learning and Onboarding Platform again.
- If you have only received an invite to the Learning and Onboarding Platform but have not activated your account, please contact your employer to delete your personal data from our Learning and Onboarding Platform.
- If you have another deletion request, please reach out to us.
- Your personal data will be deleted after 5 days. During these 5 days you can change your mind and prevent deletion.

7.4. Right to restrict our processing of your personal data

- In certain circumstances, you can ask us to limit the use of your personal data. Contact us to exercise this right.

7.5. Right to object to our processing of your personal data

- In certain circumstances, you can object to the processing of your personal data. Contact us to exercise this right.

7.6. Right to withdraw your consent

- You can withdraw your consent at any time
- If you want to withdraw your consent, please contact us at support@sixtylearn.com

7.7. Other requests

- You can always contact us with questions regarding your rights or any other questions. We reserve the right to ask you to verify your identity before fulfilling your request.
- If you are not satisfied with the way we handle your complaint, you can contact the local data protection authority.

8. Sharing your personal data

Your personal data related to the use of the Learning and Onboarding Platform is stored and processed within the European Economic Area (EEA). Read further regarding transfer outside of EEA, if applicable to you. We share your personal data with the following parties as needed.

- **Your employer.** We never share your phone number with your employer, or any other parties using the Learning and Onboarding Platform. All responses and data are visible to your employer team through the analytics dashboard. An employee with the Admin role has access to the following information:
 - o Your identifier, such as your name, email address
 - o Onboarding activity, such as playlists you have completed, have started and are yet to receive, survey questions answered.
 - o Learning activity, such as playlists you have completed, have started and are yet to receive, number of nudges set and completed, details of nudges in progress, number of individual pieces of feedback collected, survey questions answered, content of feedback collected.
- **Our service providers.** We use third-party providers, for example, to automate the sending of SMS and Emails. When we select a provider, we make sure that these service providers are contractually obliged to only use your personal data for the purposes requested by us.

Your data may be stored outside of the EEA in case you reach out to us via an email, or telephone. We make sure to set up appropriate safeguards to ensure safe transfer of such personal data, including but not limited to Standard Contractual Clauses.

9. Retention Periods

Generally, your personal data related to the use of the Learning and Onboarding Platform is deleted 12 months after our contract with your employer ends. If you leave your company while our contract with your employer is still active, your employer is responsible for deleting your account and your personal data.

If you have access to a Demo Account, we delete your account and all the linked personal data after the trial period ends.

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. If we make any material changes, we will actively inform you. The most recent User Privacy Notice is always available on our Learning and Onboarding Platform. You can find it in the footer of the 'Login' or 'Profile' page. The effective date is at the top of this document.