



# hownow

## Privacy Policy – Product

| Version | Version Date | Additions/Alterations                      | Initials |
|---------|--------------|--|----------|
| 1       | 24.05.2021   | First published                            | KS       |
| 2       | 12.05.2023   | Updated in line with business              | KS       |
| 2.1     | 12.05.2023   | Reviewed - no changes                      | KS       |
| 2.2     | 13.02.2024   | Updated in line with business requirements | KS       |

### Overview

This Privacy Policy applies to your use of the HowNow Digital Learning Platform as a Customer of Wonderush Limited (HowNow), including the use of our mobile applications. The policy applies to the data HowNow processes on behalf of our Customers ("Customer Data") in our capacity as a processor.

HowNow processes Customer Data under the direction of our Customers and has no direct control or ownership of the Personal Data we process. The Customer is responsible for complying with any regulations or laws that require providing notice, disclosure, and/or obtaining consent prior to transferring the data to HowNow for processing purposes.

### What data do we collect?

In order for us to provide the services agreed as per our Commercial agreement with our Customers, we typically collect the following Personal Data related to their Users:

- Name
- Email Address
- IP Address
- Job Role
- Start Date (Optional)
- Company ID number (Optional)
- Location (Optional)
- Department/Team (Optional)

## **How is this data used by HowNow?**

This data is used by HowNow as follows:

- Automate the onboarding/offboarding of the Users. (Optional)
- Generate content recommendations and suggestions based on User data – for example, training maybe recommended based on User's Job Role.
- To send platform notifications to Users based on their activity.
- To provide technical support when requested.

*Please note that any information received from Google APIs that is used and transferred by HowNow apps to any other apps will adhere to [Google API Services User Data Policy](#), including Limited Use requirements.*

## **How is this data used by Customers?**

As a Customer, you will use this data to share content and assign learning opportunities to your Users on the HowNow Digital Learning Platform. You will also track progress and completion metrics, compliance and engagement of your Users. HowNow does not control the content shared or the relevant User access to content on the platform – this is managed by the Customer. All data related to User engagement belongs to the Customer and will be used, disclosed and protected according to their privacy policies.

## **Data Transfer**

Although the data we collect from you is stored in the European Economic Area ("EEA"), data processed by the third parties ("sub-processors") to provide services to you as per our Commercial agreement may be transferred outside of the EEA. We will take all reasonable steps to ensure that our sub-processors meet the requirements of our Privacy Policy.

## **Data Retention**

The data collected is retained in accordance with our Licencing Terms and Conditions. The data is retained for as long as you remain an active Customer. The data will be deleted upon your written request or following the termination or expiry of the Commercial agreement.

## **User Rights**

Users have the right to request access or deletion of their individual data held or processed on our learning platform. They can make this request either via the in-platform chat support where it will be escalated to our DPO or they can send this request directly to our DPO at **dpo@gethownow.com**.