

Privacy Statement

Version: June 2024

Responsible body & data protection officer

The responsible party for the collection, storage, processing and use of your personal data is sofatutor GmbH, Grünberger Straße 54, 10245 Berlin, e-mail: support@sofatutor.com.

Our data protection officer is available as a contact person for data protection-related inquiries and concerns:

sofatutor GmbH
Data Protection Officer
Grünberger Straße 54
10245 Berlin, Germany
E-Mail: dataprotection@sofatutor.com

General Information

We process personal data of visitors, prospects, customers and users of our platforms (including in particular our learning platform at www.sofatutor.co.uk and our mobile app) for the purpose of providing the online offers, their contents and functions, the provision of contractual services, communication with users, for marketing, advertising and market research and for technical security measures. Depending on the type and scope of your use of the platforms, contact, contract, payment and usage data, as well as metadata regarding access to our websites, are processed.

In accordance with Article 13 UK GDPR, we inform you of the legal basis of our data processing. If the legal basis is not expressly stated in this Privacy Statement, the following applies: The legal basis for obtaining consent is Article 6(1) point (a) and Article 7 UK GDPR, the legal basis for processing for the performance of our services and implementation of contractual measures as well as responding to inquiries is Article 6(1) point (b) UK GDPR, the legal basis for processing to fulfil our legal obligations is Article 6 (1) point (c) UK GDPR, and the legal basis for processing to protect our legitimate interests is Article 6 (1) point (f) UK GDPR. In the event that vital interests of the data subject or another natural person require the processing of personal data, Article 6 (1) point (d) UK GDPR serves as the legal basis.

If, in the course of our processing, we disclose data to other persons and companies (processors or third parties), transmit it to them or otherwise grant them access to the data, this will only be done on the basis of legal permission, if you have consented, if a legal obligation provides for this or on the basis of our legitimate interests. If we commission service providers to process data, this is done on the basis of a so-called data processing agreement, Article 28 UK GDPR.

Under no circumstances will we sell your data or make it available to third parties without a legal basis.

If we process data in a third country or do so in the context of using third-party services or disclosing or transferring data to third parties, this will only be done if it is done to fulfil our (pre-)contractual obligations, on the basis of your consent, due to a legal obligation or on the basis of our legitimate interests. Subject to legal or contractual permissions, we only process data or have data processed in a third country if special requirements are met in accordance with Article 44 et seq. UK GDPR. This means, for example, that processing takes place on the basis of special guarantees, such as the officially recognised determination of a level of data protection corresponding to the EU or compliance with officially recognised special contractual obligations (so-called "standard contractual clauses"), if necessary in conjunction with further protective measures.

We store your data for as long as you have an active business relationship with us. After termination of this business relationship, we retain the information of the contractual relationship required by commercial and tax laws for the legally determined periods. Of course, we will also delete personal data at your request if we no longer need it for the fulfilment of the contract and we are not subject to any retention obligations. Detailed information on your rights can also be found below in the section "Your rights as a data subject".

Security & Encryption

We take appropriate technical and organisational measures to ensure a level of protection appropriate to the risk, taking into account the state of the art, the costs of implementation and the nature, scope, circumstances and purposes of the processing, as well as the varying likelihood and severity of the risk to the rights and freedoms of natural persons. The measures include, in particular, safeguarding the confidentiality, integrity and availability of data by controlling physical access to the data, as well as access to, entry into, disclosure of, assurance of availability of and segregation of the data. Furthermore, we have established procedures to ensure the exercise of data subjects' rights, deletion of data and response to data compromise. We already take the protection of personal data into account during the development and selection of hardware, software and processes, in accordance with the principle of data protection through technology design and through data protection-friendly default settings. The security measures include in particular the encrypted transmission of data between your browser and our server.

We also use providers such as Stripe Payments Europe, Limited (Ireland) to prevent fraud and abuse as well as combat it. This involves collecting identifying information about the devices that connect to Stripe services and using it for fraud detection.

Access Data & Hosting

Each time you access a website, your browser transmits the IP address assigned to you at that time, as well as other metadata relating to the access (e.g. browser and operating system used, date and time of access, page or file accessed). The corresponding data is stored by us due to our legitimate interest in monitoring and ensuring the functionality of our platforms, as well as the evaluation and optimization of our offers. However, a conclusion on your person is not possible for sofatutor due to a dynamic IP address.

For the operation of our online offers, we use infrastructure and platform services, computing capacity, storage space and database services, security services as well as technical maintenance services of our hosting service provider Amazon Web Services EMEA SARL (Luxembourg). In doing so, we, or our hosting provider, process contact data, content data, contract data, usage data, meta data and communication data of customers, interested parties and visitors of this online offer in order to provide our contractual service.



Cookies

Cookies are small files that can be stored on your computer by a website. These files contain information that can be retrieved by the website when you make a new request.

We use cookies to make our website user-friendly and to provide certain settings and functionalities. The legal basis is your consent, contract fulfilment or our legitimate interest.

For registered users, for example, identification information is stored in cookies so that communication with a website can take place in a protected manner. If you are interested in a free test at sofatutor or when you are on our platform, we store information on your computer, e.g. in a cookie, about the subject combination you have selected in order to display the relevant information to you.

You can prevent the storage of cookies through your browser settings. In this case, however, the use of sofatutor's services is limited.

User account & registration

For the comprehensive use of sofatutor a user account is necessary. For this purpose, an email address and a password must be provided during registration and additional personal information is stored by us in order to fulfil our contractual obligations.

Contract & Payment Data

When creating a subscription, we collect personal data such as your billing address, as well as payment data for contract processing.

When paying by credit card, our payment provider Stripe Technology Europe Limited (Ireland) collects the data directly. sofatutor does not have direct access to the credit card data entered by you, but receives the credit card number shortened to the last four digits and the card verification number. Stripe uses the data transmitted to you on behalf of sofatutor to charge you.

When paying via Paypal (Europe) S.à r.l. et Cie, S.C.A. (Luxemburg) or Amazon Payments Europe, S.C.A. (Luxemburg), your email address and billing data will be transmitted to us after your corresponding authorization from Paypal or Amazon Pay. sofatutor does not have any access to your payment data stored at Paypal or Amazon Pay.

The transmission of payment data only takes place via encrypted connections.

Usage Data, Videos & Exercises

When you use our platforms, we store various details about your usage behaviour and learning activities, e.g. which videos you watch as a logged-in user, which exercises have been completed and what learning progress has been made. This data is used, among other things, to provide you with recommendations for videos, your most recently viewed videos and exercises, and similar functionality.

sofatutor has a legitimate interest in collecting the usage data of the platform and providing the aforementioned functionalities to our users. We also remunerate some of our video producers depending on how many users have viewed the videos of the respective producer, how many videos these users have otherwise viewed and what the respective user has paid for his subscription. To do this, we need to store the videos you have watched. In addition, we need this data in order to be able to track your use of our offer to prevent misuse, for example, through the unauthorised saving of videos.

If a user account has been linked to a learning group, such activities that were collected in the course of interaction with the content assigned by a teacher are also displayed within the user account. Thus, sofatutor also processes and assigns to the user such usage data that was or is collected in the context of the learning groups at the instigation of the teacher. This is technically necessary to enable the linking of learning group and usage account and this ensures that uniform information regarding activities is displayed both in the learning group area and in the sofatutor profile.

Communication, Support & Chat

We use various communication channels to be available for you or to get in touch with you. In particular, you can contact us by telephone, by e-mail or by chat via our website. In each case, the data you provide and, if applicable, your telephone number, email address or IP address are stored by us in order to be able to process your inquiries.

We use the Helpscout service from Help Scout PBC (USA) to process your inquiries by e-mail and to map our FAQ page. We can use an AI-based assistance tool from Helpscout to help us answer your inquiries. Every response generated is checked by our employees before it is sent to you. No automated decision-making takes place.

Our telephone system for handling customer inquiries is operated via the service Aircall SAS (France). When you contact us or we contact you by phone, your phone number is recognised by Aircall and linked to Helpscout through an integration so that our staff can see the communication history.

The function of direct chat with tutors on our website is technically enabled by the Olark service of Habla Inc (USA). In this context, the data of logged-in users is forwarded by Olark to our staff (internal and external).

In addition, we offer a personal introduction to our website. For this, you can make an appointment by providing the necessary information such as name, email address, telephone number, choice of learning subjects and grade level of your child. We use a tool from the provider Appointlet, LLC (USA) to book appointments. One of our guides will then contact you by phone and conduct the tour together with you. We make this call with the help of the provider Aircall SAS (France). Only if you give us your explicit consent, your call will be recorded for training purposes only and deleted after one year.

sofatutor can also assign freelancers to take care of the chats and provide personal introductions. For this purpose, general user data transmitted by the browser, such as the browser used, as well as further customer data for logged-in customers (user name, e-mail address and the subject/topic of the current video) are transmitted in order to be able to help you as well and as quickly as possible.

Customer Surveys & Ratings

sofatutor uses the services SurveyMonkey (USA) and Hotjar (Malta) to survey customers through a pop-up after the purchase process. In doing so, your browser communicates directly with the services. In a few cases, sofatutor transmits a user ID to SurveyMonkey or Hotjar, but this does not allow SurveyMonkey or Hotjar to draw any conclusions about your person. sofatutor receives an evaluation of the answers from the aforementioned services.

sofatutor has a great interest in documenting the satisfaction of our customers through independent surveys and to use this information for further improvements. Therefore, on our behalf, the service eKomi of eKomi Holding GmbH (Germany) determines the satisfaction of our customers through surveys by email.



Email Communication and Advertising

We use the email address provided by you when creating a user account or when concluding a sofatutor subscription in order to contact you regarding our respective contractual relationship and to be able to send you all important and further information that is of interest to you on the one hand.

On the other hand, we use your email address to inform you about products and other sofatutor offers in which you have a presumed information interest. This also applies to the advertising of our paid offer if you have initially only selected access to our free offer by creating a user account. You can object to the use at any time by sending a message to the email address below or by clicking on the unsubscribe link in the email without giving any reasons.

sofatutor uses the providers Episerver GmbH (Germany) and SendGrid of Twilio Inc. (USA) for sending offers and information by email. In this regard, email addresses, names, and other information regarding your interaction with our emails are stored on servers of these providers. However, personal data may not be used by these providers for purposes other than sending emails on behalf of sofatutor.

Under certain circumstances, we may also use your contact data that we have collected in the course of entering into a contractual relationship with you in order to be able to inform you by mail about offers, for example, if the term of your subscription is coming to an end or has already expired, or if you have cancelled or revoked your subscription within the free trial period.

In addition, we conduct general analyses of existing customers in order to obtain a better picture of our customer base and, if necessary, to potentially approach new, similar customers based on this. For this purpose, we sometimes use external providers, with each of whom special contracts are concluded for the protection of your data.

You can object to the use of your personal data for the aforementioned marketing purposes at any time free of charge with effect for the future by sending an email to dataprotection@sofatutor.com.

Web Analysis & A/B Testing

sofatutor uses various web analytics services to review and improve its offering. These are partly integrated via the Google Tag Manager, which enables the administration of the services. The Tag Manager itself does not set any cookies and does not collect any personal data - except for the IP address, which is technically necessary for the execution of the Tag Manager. The services collect information about your usage behaviour, the browser you use and settings. This information can neither be linked to your person by the web analytics services nor by sofatutor.

In detail, these are the following services:

Google Analytics - sofatutor uses Google Analytics, a service of Google Ireland Ltd (Ireland), to analyze and improve the offer. Google Analytics uses cookies, text files that are stored on your computer and enable an analysis of your use of sofatutor. The information generated by the cookie about the use of sofatutor is transferred to a Google server in the USA and stored there. sofatutor uses IP anonymization for Google Analytics. Your IP address is therefore shortened by Google before transmission in a member state of the European Union or a contracting state of the Agreement on the European Economic Area, so that a personal reference can no longer be established, even by third parties. We can also use the data collected by Google Analytics to place particularly relevant advertisements on other websites for certain user groups (e.g. visitors to a certain page of the platforms) via Google AdWords. It is not possible for us to identify individual persons in this process. You can revoke your consent to the collection and storage of data at any time with effect for the future by downloading and installing the browser plugin available under the following link

<https://tools.google.com/dlpage/gaoptout?hl=en>.

Amplitude - In order to make the functions of sofatutor even more user-friendly, we use the analysis platform of the company Amplitude Inc (USA). The service helps us to learn, for example, how our users get to an exercise task and thus to optimize this path. As is usual with external resources, your IP address and your User ID are transmitted to the third-party provider. The User ID does not contain any personal data.

Convert - For testing improvements on the platforms, sofatutor uses the convert service of Convert Insights Inc. (USA) (A/B tests). This involves randomly selecting a portion of our customers to display possible changes in order to test their popularity. A request is sent from your IP address to Convert in order to statistically record the behavior on the website.

Hotjar - sofatutor uses Hotjar, a service provided by Hotjar Ltd (Malta), to analyze and improve its services. Hotjar uses cookies, which are text files placed on your computer, to help the website analyze how users use sofatutor. The information generated by the cookie about the use of sofatutor is transmitted to a server in Ireland and stored there. Your IP address is shortened by Hotjar before transmission and thus anonymized, so that a reference to a person can no longer be established, even by third parties. The complete privacy policy of Hotjar can be found [here](#). If you do not wish your data to be collected by Hotjar, you can object to this [here](#).

Unbounce - In order to inform interested parties as well and helpfully as possible and to constantly improve the offer, sofatutor uses the service Unbounce of Unbounce Marketing Solutions Inc. (Canada). For promotions or advertising campaigns, individual pages are hosted by Unbounce and sofatutor receives an evaluation of the activities of the interested parties. Your browser communicates directly with Unbounce so that your IP address is transmitted and cookies can be set.

Scout - To check the functions of us.sofatutor.com, the service Scout of Zimuth Inc. (USA) is used. Data about the execution of the program code is collected in order to analyze in particular the loading times of individual page components. The evaluation of this data is transmitted to sofatutor in aggregate form and it is not possible for sofatutor to establish a relationship to individual users. Only for calls where problems such as a particularly slow loading time occur, information about individual calls is also transmitted. An identification of the user is not possible for sofatutor even in this case, only if you were logged in on our site. No further user data is transmitted by sofatutor to Scout.

Bugsnag - In order to correct errors and problems with the functionality of sofatutor.co.uk, sofatutor uses the service Bugsnag of Bugsnag Inc (USA). In the event of an error, the IP address, data on the user's settings (e.g. the browser used) and details of the page where the error occurred and the data entered are transmitted to Bugsnag for evaluation, categorization and analysis of the error.

Sentry - In order to check our code for errors and thus to be able to ensure the technical stability of our offer, we use the Sentry service of Functional Software, Inc (USA). For this purpose, information about your browser, terminal device and operating system as well as user ID is processed. You can find more information about this in Sentry's privacy policy [here](#).

Userlane - We use the service of Userlane GmbH (Germany) for the display of statements as part of the personal introduction on our website. Cookies are set for this purpose. Further information [here](#).

Marketing & Advertising Provider

sofatutor GmbH
Managing Directors: Stephan Bayer, Colin Schlüter, Arne Strawe
District Court Charlottenburg HRB 112531 B

Wise Payment Solutions
IBAN GB82 TRW1 2314 7055 3444 03
BIC TRWIGB22

Account number 55344403
Sort Code 23-14-70
VAT ID GB421731821



We use various external service providers and advertising networks to market our offer. The following applies to all tools: You can object to their use by making the appropriate setting in the cookie preferences.

Advertising providers (Google Ads (USA), Bing Ads (USA), Facebook Ads (USA), Outbrain (USA), YouTube (USA), TikTok Ads (Ireland and the UK), Podsights (USA)) are integrated when using the platforms without being logged in as a registered user. Thus, when you access the platforms, a request is sent to these third-party providers. Your browser then communicates directly with the respective third-party provider. The provider learns your IP address and can store cookies on your computer. These cookies only contain the information that you are interested in our platform, so that advertising for sofatutor, such as special offers, can be delivered to you on websites of the partners of these advertising providers. sofatutor itself does not access cookies of third-party providers and does not transmit any personal data to these advertising providers.

Also, after logging in to sofatutor, a request is sent to our advertising partners. Your browser then communicates directly with our partners. This allows them to check whether a corresponding cookie is stored on your computer due to previous interaction with advertising of the respective partner and then inform us about the number of registrations/purchases.

The privacy policies, as well as the configuration of the interest-based advertising of the advertising providers can be viewed at the following links:

<https://policies.google.com/technologies/ads>

<https://privacy.microsoft.com/privacystatement>

<https://www.facebook.com/about/privacy/>

<https://www.outbrain.com/legal/amplify-terms#privacy-policy>

<https://www.tiktok.com/legal/privacy-policy-us?lang=en>

<https://podsights.com/privacy-policy>, <https://podsights.com/optout>

Facebook Conversion API: We use the Facebook Conversion API, a server-side event tracking tool, on our website. It is a data interface through which we transmit data about your behavior on our website to Facebook for evaluation and thus display ads to you that match your user behavior on our website. Usage data (e.g. web pages visited, interest in content, access times) as well as meta/communication data (e.g. device information, IP addresses) are processed. Your data will not be passed on to third parties. However, we work together with Facebook to create user statistics. In the process, data may also be processed in the USA. As a basis for this data processing, we use the standard contractual clauses approved by the EU Commission. Provider: Meta Platforms Ireland, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland. Information on data protection can be found [here](#).

Criminal Behavior of Users

The data required for criminal prosecution will be forwarded to law enforcement agencies if there is a reasonable suspicion of a criminal offence, such as fraudulent disclosure of the account details of a third person.

Information for applicants

If you would like to apply for a job with us and use the application form on our website, we will need your first and last name, email address, telephone number and CV. Optionally, you can provide us with a photo, cover letter or additional information such as references. You can also apply to us through other channels such as email. We manage the data you submit in an applicant database offered by the service provider Recrutee B.V. (Netherlands), with whom we have concluded a data processing agreement for this purpose, irrespective of how you submit your documents.

We need to collect and process your data in order to manage your application. The data you provide will only be used in this regard. We will only add you to our talent pool with your consent. In this case, the legal basis for the storage is your consent, which you can revoke at any time.

If you have not consented to a longer storage period as explained above, we will delete your data after the application process has been completed, as soon as it no longer needs to be stored for our legal defence. Should the application process be positive and we hire you, the duration of the storage of your data will be based on the statutory retention obligations.

User Rights

Under the UK GDPR you have the right to

obtain confirmation as to whether data relating to you is being processed and to obtain information about this data and further information and a copy of the data;

request that the data concerning you be completed or that incorrect data concerning you be corrected

demand that data concerning you be deleted without delay or, alternatively, to demand restriction of the processing;

obtain the data concerning you that you have provided to and to request that it be transferred to other data controllers; and

to complain to the UK data protection regulator (the "ICO") about how we have used your personal data. You can find more information here:

<https://ico.org.uk/your-data-matters/raising-concerns/>

Changes to this Privacy Policy

In the event of a change in legal regulations or in our service, it may become necessary to adapt this data protection declaration. The current version of the data protection provisions can be viewed at any time here <https://sofatutor.co.uk/legal/privacy-statement>.