

## Privacy Quest Privacy Policy

Privacy Quest is a gamified privacy learning platform that offers privacy professionals a captivating and enjoyable learning experience.

### Data Controller Information:

Verilogy OÜ, [info@privacyquest.org](mailto:info@privacyquest.org)

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This Privacy Policy applies to **Privacy Quest**, which provides a platform to help privacy professionals level up their privacy skills.

To ensure transparency, this privacy policy ("**Privacy Policy**") governs how we will process personal data we collect or receive from or about you ("**you**") in the following use cases:

- When you visit our Privacy Quest website
- When you register to the waiting list and log in to our product
- When you set up your account and start playing
- When you provide us with feedback
- When we acquire your data from third-party sources
- When we use the personal data of our subscribers (e.g. contact details)
- When you interact with us on our social media profiles and our blog

### Table of contents:

1. Information we collect and how we process it
2. How we protect and retain your data
3. How we share your data
4. Additional information regarding transfers of personal data
5. Your privacy rights
6. Use by children
7. Interaction with third-party products
8. Log files
9. Analytic tools
10. How to contact us

# 1. Information we collect and how we process it

## When you visit our Website

### Personal Data:

- IP address
- Browser type
- Operating system
- referring URLs
- your use of our website, and other clickstream data.

### Source:

- We obtain the personal data directly from you
- We obtain personal data from third parties

### Purpose of Collecting:

- To provide certain features of the Website
- To enhance your user experience
- To understand and save your preferences for future visits
- To advertise to you on other sites
- To compile aggregate data about site traffic and site interaction so that we can offer better Website experiences and tools in the future

### Legal Basis:

- Legitimate interest (e.g. essential cookies)
- Consent

### Third Parties We Share Data With:

- Gitbook (hosting and CMS)
- Hetzner (cloud service provider)
- Poetic Metric (privacy-friendly analytics)
- Youtube

### Retention Period:

We delete any information collected during your session for 1 year.

**Consequence of Not Providing Data:**

- Certain Website features may not be available
- Cannot enhance your user experience
- Cannot understand and save your preferences for future visits
- Cannot advertise to you on other sites
- Cannot compile aggregate data about site traffic and site interaction so that we can offer better Website experiences and tools in the future.

**When you register to Privacy Quest Privacy Treasure Hunt ARG and log in to our product**

**Personal Data:**

- First name
- Last name
- Email address
- Session Information
- Company Name
- Usage Information
- Any other information that you provide us (e.g. in the context of support , optional)

**Source:**

- We obtain the personal data directly from you

**Purpose of Collecting:**

- To be able to create a user account/profile
- To be able to log in and use the service
- To perform activities within the product,
- To receive notifications and to collaborate within the product.
- To provide you with our services

**Legal Basis:**

- Processing is necessary for the performance of a contract to which the data subject is party or to take steps at the request of the data subject before entering into a contract.

- Legitimate interest (e.g. analyzing aggregate data).

#### **Third Parties We Share Data With:**

- Gitbook (Documentation and CMS)
- Cloudflare (security)
- Typeform (waitlist registration)
- Mailgun (email service provider)
- Digital Ocean (cloud service provider)
- Poetic Metric (privacy-friendly analytics provider)

#### **Retention Period:**

Until we no longer need the information and proactively delete it or you send a valid deletion request.

Please note that we may retain it for a longer or shorter period in accordance with data retention laws.

#### **Consequence of Not Providing Data:**

- You cannot create an account.
- You cannot log in
- You cannot use the service
- You cannot perform activities within the product
- You cannot receive notifications and to collaborate within the product.
- We cannot provide you with our services

### **When you interact with us on our social media profiles and our blog**

#### **Personal Data:**

- Unique ID
- Session Information
- Usage Information
- Operating System

#### **Source:**

- We obtain the personal data directly from you
- We obtain personal data from third parties

**Purpose of Collecting:**

- To help us show more targeted and relevant content
- To send weekly newsletters
- To gather analysis or valuable information so that we can improve our product
- To monitor the usage of our Service
- To advertise to you on other sites

**Legal Basis:**

- Legitimate Interest (marketing)
- Consent

**Third Parties We Share Data With:**

- Gitbook (Hosting and CMS)
- LinkedIn (Early Access Newsletter)
- Ghost (blog and CMS)
- Newsletter (Substack)

**Retention Period:**

Until we no longer need the information and proactively delete it or you send a valid deletion request.

Please note that we may retain it for a longer or shorter period in accordance with data retention laws.

**Consequence of Not Providing Data:**

- Certain blog features may not be available
- Cannot enhance your user experience
- Cannot understand and save your preferences for future visits
- Cannot advertise to you on other sites
- Cannot compile aggregate data about site traffic and site interaction so that we can offer better Website experiences and tools in the future.

This Privacy Policy and above mentioned processing activities can be updated from time to time and, therefore, we ask you to check back periodically for the latest version of this Privacy Policy. If we implement significant changes to the use of your data in a manner

different from that stated at the time of collection, we will notify you by posting a notice on our Website or by other means.

We may also use some other information like session and usage information for fraud detection and prevention and for security purposes. The above-mentioned personal data may also be used to comply with applicable laws, with investigations performed by the relevant authorities, for law enforcement purposes, and/or to exercise or defend legal claims.

## **How we protect and return your information**

We have implemented commercially reasonable technical, organizational, and security measures designed to protect your data. However, please note that we cannot guarantee that the information will not be compromised as a result of unauthorized penetration to our servers. As the security of information depends in part on the security of the computer, device, or network you use to communicate with us and the security you use to protect your user IDs and passwords, please make sure to take appropriate measures to protect this information.

Retention of your data. In addition to the retention periods mentioned above, in some circumstances, we may store your personal data for longer periods, for example (i) where we are required to do so by legal, regulatory, tax, or accounting requirements, or (ii) for us to have an accurate record of your dealings with us in the event of any complaints or challenges, or (iii) if we reasonably believe there is a prospect of litigation relating to your data or dealings.

## **How we share your data**

In addition to the recipients described above, we may share your data as follows:

- To the extent necessary, with regulators, courts, or competent authorities, to comply with applicable laws, regulations, and rules (including, without limitation, federal, state, or local laws), and requests of law enforcement, regulatory, and other governmental agencies or if required to do so by court order;
- If, in the future, we sell or transfer, or we consider selling or transferring, some or all of our business, shares, or assets to a third party, we will disclose your data to such third party (whether actual or potential) in connection with the previous events;
- If we are acquired by, or merged with, a third-party entity, or in the event of bankruptcy or a comparable event, we reserve the right to transfer, disclose, or assign your data in connection with the foregoing events; and/or
- Where you have provided your consent to us sharing or transferring your data (e.g., where you provide us with marketing consents or opt-in to optional additional services or functionality).

## **Additional information regarding transfers of personal data of European citizens**

Where we transfer your data outside of EU/EEA), we will obtain contractual commitments from them to protect your personal data. Some of these assurances are Standard Contractual Clauses for international transfers outside the EU.

## Your privacy rights

- The following rights (which may be subject to certain exemptions or derogations) shall apply to certain individuals (some of which only apply to individuals protected by the GDPR):
- You have a right to access personal data held about you. Your right of access may normally be exercised free of charge, however we reserve the right to charge an appropriate administrative fee where permitted by applicable law;
- You have the right to request that we rectify any personal data we hold that is inaccurate or misleading;
- You have the right to request the erasure/deletion of your personal data (e.g. from our records). Please note that there may be circumstances in which we are required to retain your personal data, for example for the establishment, exercise or defense of legal claims;
- You have the right to object, to or to request restriction, of the processing;
- You have the right to data portability. This means that you may have the right to receive your data in a structured, commonly used, and machine-readable format and that you have the right to transmit that data to another controller;
- You have the right to object to profiling;
- You have the right to withdraw your consent at any time. Please note that there may be circumstances in which we are entitled to continue processing your data, in particular, if the processing is required to meet our legal and regulatory obligations. Also, please note that the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal;
- You also have a right to request certain details of the basis on which your data is transferred outside the European Economic Area, but data transfer agreements and/or other details may need to be partially redacted for reasons of commercial confidentiality;
- You have a right to lodge a complaint with your local data protection supervisory authority (i.e., your place of habitual residence, place of work, or place of alleged infringement) at any time or before the relevant institutions in your place of residence. Please attempt to resolve any issues with us before you contact your local supervisory authority and/or relevant institution.
- You can exercise your rights by submitting a request here. Subject to legal and other permissible considerations, we will make every reasonable effort to honor your request promptly by applicable law or inform you if we require further information to fulfill your request. When processing your request, we may ask you for additional information to confirm or verify your identity and for security purposes, before processing and honoring your request. We reserve the right to charge a fee where permitted by law, for instance, if your request is manifestly unfounded or excessive. If your request would adversely affect the rights and freedoms of others (for example, would impact the duty of confidentiality we owe to others) or if we are legally entitled to deal with your request in a different way than initially requested, we will address your request to the maximum extent possible, all by applicable law.

## Deleting your account

Should you ever decide to delete your account, you may do so by submitting a request to [info@privacyquest.org](mailto:info@privacyquest.org). If you terminate your account, any association between your account and personal data we store will no longer be accessible through your account. However, given the nature of sharing on certain services, any public activity on your account before deletion will remain stored on our servers and will remain accessible to the public.

## **Use by children**

We do not offer our products or services for use by children and, therefore, we do not knowingly collect personal data from, and/or about children under the age of eighteen (18). If you are under the age of eighteen (18), do not provide any personal data to us without the involvement of a parent or a guardian. For the GDPR, we do not intend to offer information society services directly to children. If we become aware that you provide personal data in violation of applicable privacy laws, we reserve the right to delete it.

## **Interaction with third-party products**

We enable you to interact with third-party websites, mobile software applications, and products or services that are not owned or controlled by us (each a “Third Party Service”). We are not responsible for the privacy practices or the content of such Third Party Services. Please be aware that Third Party Services can collect Personal Data from you. Accordingly, we encourage you to read the terms and conditions and privacy policies of each Third Party Service.

## **Log files**

We use log files. The information inside the log files includes internet protocol (IP) addresses, type of browser, Internet Service Provider (ISP), date/time stamp, referring/exit pages, clicked pages, and any other information your browser may send to us. We use such information for security purposes and to analyze trends, administer the Website, track users' movement around the Website, and gather demographic information.

## **Contact us**

If you have any questions, concerns, or complaints regarding our compliance with this notice and the data protection laws, or if you wish to exercise your rights, we encourage you to first contact us at [info@privacyquest.org](mailto:info@privacyquest.org)



