

# **Privacy Policy of GAIA Insights GmbH**

GAIA Insights GmbH knows that You care how information about You is collected, used, shared and stored. We appreciate that You trust us to do so carefully and sensibly, and within the framework of legal regulations. With this policy, we inform You about what data we collect from You and how we use it.

For external links to third-party content or other websites, despite careful content control, GAIA Insights does not accept liability or responsibility for any privacy policies, practices and/or procedures of other such websites, since we do not initiate the transmission of this information, or select or change the addressee of the transmitted information or the transmitted information itself. Therefore we encourage all users and visitors to be aware when they leave our Websites and to read the privacy statements of each and every website that collects personally identifiable information.

#### 1. General

The use of our Websites is generally possible without providing personal information. If personal data such as Your name, address or e-mail address is collected on our Websites, You provide this information voluntarily (for example when you ask us to send you promotional material or to enter into a contract with us), unless specified otherwise. We will not disclose or share this data with third parties without Your explicit consent. Associates or business partners of GAIA Insights (such as coaches, experts and clients) who are under obligations of confidentiality and privacy not less strict than those set out herein will not be regarded as third parties.

We expressly point out in this context that there may be security vulnerabilities or gaps when transmitting or transferring data online or electronically (for example in the case of communication by e-mail). As a result, complete protection of such data from access by third parties is not possible.

#### 2. Collection and Storage of Personal Data

- (a) Every time You access our Websites, the internet browser used on Your device (computer, laptop, tablet, smartphone etc.) automatically transmits information to the server of our Websites, which is temporarily stored in log files on the server. User-specific data will be collected without Your intervention and stored until automatically deleted, such as:
  - If necessary the IP address of the requesting computer, as well as device ID or individual device identifier and device type;
  - Name of any retrieved file and volume of data transferred, as well as date and time of retrieval:
  - Message about successful call;

- Requesting domain (origin of your request, from which You came to our Websites);
- Description of the type of browser used and if applicable the operating system of Your terminal and the name of Your access provider:
- The name and URL of the referring website if the website was accessed via a link and, additionally, the search term if it was accessed via a search engine;
- Location information, including location data from Your mobile device. Please note that on most mobile devices, You can control or disable the use of location services in the mobile device's settings menu;
- Cookies (small text files stored locally on Your device and web browser, e.g. a computer or smartphone when you access the Websites). Please note You can configure Your browser to inform You about the placement of cookies, so You can decide in each instance whether to accept them, allow exceptions, or reject them in general. You can also use the cookie banner to disable or set preferences on which cookies may apply to You. Rejecting cookies can restrict the functionality of our Websites.

This data will not be associated with specific people. The data is not combined with data from other sources, and in no case we use the collected data for the purpose of drawing conclusions about You. We reserve the right to check this data retroactively if we have specific reason to believe that it is being used unlawfully.

- (b) When concluding any contractual relationship of any kind on our Websites, if You register to use certain products and/or services that we offer or by using various functionalities of GAIA Insights Websites and online tools such as commenting, ordering or program registration, we ask You to provide us with certain personal data, including:
  - Data that personally identifies You, such as your natural name, email address or LinkedIn profile;
  - Other personal data that may be used when You purchase our products and/or services (for example our Programs) and which we need to deliver what You have requested, such as your billing and/or credit card information, company name, phone number, location or time zone:
  - Other personal data which we are legally obliged or authorized to collect and process and which we need for your authentication, identification or verification of the data we collect.

Please rest assured that we shall only collect personal information that You knowingly and willingly provide by way of completed forms (such as contact, booking or newsletter subscription forms), surveys, questionnaires and emails.

#### 3. Purpose and Use of Information Collected

Our legitimate interest for the collection of automatic/connection data is based on the following purposes:

- To ensure a smooth connection and comfortable use of the Websites:
- To enable the use of our content;
- For the internal management of the Websites (e.g. system security and stability, and technical administration);
- To assist in the operation of our Websites;

- To provide, maintain and optimize quality service (e.g. statistics collection, measuring the number of visitors to our Websites);
- For further administrative purposes (e.g. to tailor information on the Websites to target groups).

Our legitimate interest for the collection of personal data You provide to us is based on the following purposes:

- To ensure delivery of the products and/or services You need and request;
- To answer any queries You have about GAIA Insights and notify you of any changes to our Websites;
- To provide information You have requested (e.g. subscriptions, Program registration confirmation and further details on a Program, forgotten password);
- To keep you informed about other possible products and/or services that may be available to You from GAIA Insights and our Websites;
- To contact You with regards to completing surveys and/or questionnaires related to your opinion of current and/or potential future products and/or services that may be offered.

We may deem it necessary to follow websites and/or pages that our users may frequent in an effort to gleam what types of services and/or products may be the most popular to customers or the general public.

We do not now, nor will we in the future, sell, rent or lease any of our visitor or customer lists and/or names to any third parties. We will make no commercial use of the information, unless this is done with Your expressed prior consent.

We may disclose Your personal information, without prior notice to You, only if required to do so in accordance with applicable laws and/or in a good faith belief that such action is deemed necessary or is required in an effort to:

- Remain in conformance with any decrees, laws and/or statues or in an effort to comply with any process which may be served upon GAIA Insights and/or our Websites;
- Maintain, safeguard and/or preserve all the rights and/or property of GAIA Insights and/or our Websites; and
- Perform under demanding conditions in an effort to safeguard the personal safety of users of the Websites and/or the general public.

If You have given us consent to process Your personal data for specific purposes, we process Your personal data within the scope of and based on this consent, unless we have another legal basis and we require such a basis.

#### 4. Rights to Information, Correction, Blocking and Deletion of Data

On request, we will be pleased to inform You whether and which personal data about You are stored, including the category, origin, any recipients of Your data and the purpose for which it is used.

You also have the rights to correct, block or delete such data, for example:

- To correct any incorrectly collected personal data or to complete incomplete data collected:
- To demand that we restrict the processing of Your data, provided that the legal conditions for doing so are met;
- To receive the personal data relating to You in a structured, common and machinereadable format or to request the transfer to another person responsible;
- To the so-called "right to be forgotten". You can request the deletion of your personal data from us, provided that the legal prerequisites exist. Regardless of this, Your personal data will be automatically deleted by us if the purpose of the data collection has been omitted or the data processing has been unlawful;
- To revoke Your consent to us at any time. As a result, we are no longer allowed to continue the data processing based on this consent for the future, and Your personal data will also be automatically deleted by us;
- To object to the processing of Your personal data at any time, provided that a right of objection is provided for by law.

If you have any questions about personal data or would like to exercise Your right of revocation or objection, you can contact us using the email address listed at the end of this Privacy Policy.

## 5. Transfer of Personal Data

As mentioned above, we only transfer Your data to third parties if:

- You have given Your express consent to this;
- This is necessary for the settlement of contractual relationships with you;
- There is a legal obligation to pass it on;
- Disclosure is required for asserting, exercising or defending legal claims and there is no reason to assume that You have a predominantly legitimate interest in not disclosing your data.

In these cases, however, the amount of data transmitted is limited to the minimum required. Data is processed and stored on servers of GAIA Insights or third party service providers, some of whom may be based outside of Switzerland. Accordingly, your personal data may be transferred to and processed in locations outside the country in which you are viewing the Websites, which may be within the European Economic Area or another country providing an adequate level of data protection in accordance with applicable law or the USA.

#### 6. Children Under Age of 13

GAIA Insights does not knowingly collect personal identifiable information from children under the age of thirteen (13) without verifiable parental consent. If it is determined that such information has been inadvertently collected on anyone under the age of 13, we shall immediately take the necessary steps to ensure that such information is deleted from our system's database. Anyone under the age of 13 must seek and obtain parent or guardian permission to use our Websites.

## 7. Duration of Data Storage

The data collected will be stored by GAIA Insights in electronic format as long as necessary for the performance of the contracts we have entered into, or as long as You have not exercised Your right to cancellation or Your right to transfer data to another company.

#### 8. External Applications on Our Websites

Social Media Platforms

Our Websites sometimes use social media plugins and/or make their platforms available to You (such as Facebook, Twitter, Instagram, LinkedIn and Vimeo), which may be recognized by their respective social icons or buttons on our Websites. Using these, visitors may be redirected to the respective social media networks in a new window, which may ask you to log in to Your account or profile. The platform operators may be able to associate the visit to our Websites with Your respective social media account or profile. We point out that we have no influence on the scope, content, processing and use of the collected or transmitted data by these respective platforms. For this information, as well as Your related rights and settings options for the protection of Your privacy, please consult the Privacy Statements of all such platforms before using them. GAIA Insights cannot be held responsible for personal information You share on social media platforms and we hereby release ourselves from any liability with regard to the data collection and storage of such third parties.

Web Analytics Collection Services

Our Websites will use your connection data for statistical purposes and to manage and improve the usability of the Websites by means of particular software or cookies (see clause 2 above).

## 9. Unsubscribe or Opt-out

All users and/or visitors to our Websites have the option to discontinue receiving communication from us and/or reserve the right to discontinue receiving communications by way of email or newsletters. To discontinue or unsubscribe to our Websites send an email that You wish to unsubscribe to <a href="mailto:info@gaia-insights.com">info@gaia-insights.com</a>. If You wish to unsubscribe or opt-out from any third party websites, you must go to that specific website to unsubscribe and/or opt-out.

# 10. Security

GAIA Insights shall endeavor and shall take every precaution to maintain adequate physical, procedural and technical security with respect to our offices and information storage facilities so as to prevent any loss, misuse, unauthorized access, disclosure or modification of the user's personal information under our control.

## 11. Changes to Privacy Policy

GAIA Insights reserves the right to update and/or change its Privacy Policy at any time due to the further development of its Websites and offers or due to changed legal or regulatory requirements. Your continued use of our Websites following the posting of any updates or changes to our Privacy Policy shall mean that You are in agreement and in acceptance of such changes. The current Privacy Policy can be viewed and printed on our Websites at any time using this link.

# 12. Contact Details of the Controller

We are pleased to help all concerned in connection with the handling of personal data and exercising their rights. If You have any questions or concerns regarding the Privacy Policy related to our Websites, please feel free to contact us at the following email or mailing address:

#### **GAIA Insights GmbH**

Email: info@gaia-insights.com

Mailing Address: GAIA Insights GmbH, St. Johanns-Ring 54, CH-4056 Basel, Switzerland