Privacy Policy

This document explains the manner and the basis on which we process your personal data when you contact us or use one of our services.

You shall learn, among others:

- why we may process your data;
- the purpose we process it;
- whether you are required to provide us with your data;
- how long we store it;
- whether there are other recipients of your personal data;
- whether we process your data outside the European Economic Area;
- whether we process your data in an automated manner, including the information whether we profile it.

The first part of the Privacy Policy contains the information that we must provide to everyone, regardless of the purpose of data processing.

The second part contains the information for a person who: browses our website, sends us a message by completing the contact form in the tab 'Contact', requests a conversation with us, or chats with us using the functionality available in the lower right corner of the page (pop-up with a phone or cloud symbol), contacts us by writing or calling with the use of our contact details (phone number, email address) provided on the website or obtained in another way, arranges a presentation of the Thulium System with us.

The third part contains the information for a person who subscribes to our newsletter.

The fourth part contains the information for a natural person representing or acting on behalf of the Subscriber who accepts the Terms and Conditions of the Thulium Communication Application Service, thereby entering into a relevant agreement with us and who has obtained the rights of the Owner on the terms specified in the above-mentioned Terms and Conditions. The fourth part also contains the information for a natural person representing or acting on behalf of the Partner who accepts the Terms and Conditions of the Thulium Partner Program, thereby entering into a relevant agreement with us.

The fifth part contains the information for the User within the meaning of the Terms and Conditions of the Thulium Communication Application, who has been granted access to the Thulium System in connection with the agreement concluded between us and the Subscriber.

The sixth part contains the information for a person—a representative of our potential client - who we contact using the data from publicly available sources, such as LinkedIn or company websites, exclusively related to business activities.

The seventh part contains information for a User within the meaning of the Thulium Academy Terms and Conditions who has been granted access to the Platform for the purpose of completing the Courses that enable more effective use of the Thulium System.

Information on the processing of your personal data as a candidate for employment in our team is available here (Information on the processing of your personal data as a participant in the recruitment process).

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Part I. General information

Contact details of the controller of your personal data

We, Thulium sp. z o.o., with the registered seat in Krakow (30-705), at ul. Stanisława Klimeckiego 4, entered in the Register of Entrepreneurs of the National Court Register under KRS [National Court Registry] number: 0000409650, with NIP [Tax Identification Number] 6783144527, are the controller of your personal data. For all matters relating to the processing of your personal data, you can contact us by email at: kontakt@thulium.pl

Data Protection Officer

In order to ensure protection of personal data, we have appointed Maciej Bednarek as a Data Protection Officer. The officer can be contacted at dpo [@] thulium.pl

Where do we obtain your personal data?

The personal data we collect through our website or in connection with provision of our services comes directly from you. This happens when:

- You browse our website.
- You send us a message using the contact form available on the website.
- You request a call or start a chat using the pop-up available in the lower right corner of our website.
- You contact us by phone or email using the contact details available on the website or obtained in another way (e.g., during a business meeting or conference).
- You arrange a presentation of the Thulium System with us.
- You subscribe to our newsletter.
- You enter into an agreement with us by accepting the relevant Terms and Conditions.
- You use the Thulium System as an authorized User.

We may also process your data when you provide it to us yourself, e.g., by handing over your business card in order to establish business cooperation.
We may collect the personal data we process from publicly available sources, primarily from your professional profile on LinkedIn. In this regard, we only use basic data to contact you in order to establish business cooperation.

What rights do you have in relation to the personal data processing?

Below we present your rights related to the personal data protection and the fact that we process your data. The rights you have in a specific situation depend on the purpose and basis for which we process personal data.

The right of access to data

You have the right to obtain the information about the personal data we store about you. When you submit a request for access to your data, you will receive the information about the processing of your personal data, including, in particular, the purposes and legal basis for the processing, the scope of the data held, the entities who the personal data is disclosed to as well as the planned date of its deletion.

The right to rectification

You have the right to have your personal data rectified and/or completed without undue delay. It is our responsibility to ensure that our mutual communication is based on accurate, complete and up-to-date

data.

The right to restrict processing
You have the right to request that we restrict the processing of your personal data if you question accuracy of the your data stored by us if the processing is without legal basis or if you have objected to its processing.

The right to deletion

You have the right to request to delete your personal data stored by us unless keeping the data is necessary to ensure freedom of expression, freedom of access to information, compliance with legal obligation, for reasons of public interest, for establishment or defense of legal claims or for enforcement of the legal rights.

The right to information

If you have exercised your right to rectification, deletion or restriction of data processing, we will notify all recipients of your personal data of rectification, deletion or restriction of processing unless this is impossible or involves disproportionate effort.

The right to data portability

You have the right to obtain a copy of the data you have provided to us, which will be sent to you or a third party in a structured, standard format that is machine-readable. If you request that this data be sent to another data controller, this will be done if technically possible. This right applies only to situations where we process your data on the basis of your consent or in connection with performance of the contract.

The right to object

If your personal data is processed on the basis of our legitimate legal interest, you have the right to object to further processing at any time. We will consider your request pursuant to the rules set out in the regulations.

The right to withdraw the consent

If your data is processed on the basis of consent, you have the right to withdraw it at any time, with future effect. This will not affect lawfulness of the data processed so far.

The right to lodge a complaint with a supervisory authority

If the processing of your personal data violates data protection regulations or if your data protection rights have been violated in any other way, you can lodge a complaint with a supervisory authority. The competent supervisory authority in Poland is the President of the Personal Data Protection Office in Warsaw. Before exercising your right to lodge a complaint, we encourage you to contact us first so that we can clarify any doubts you may have.

Processing of the request

If you submit a request to exercise a particular right, we will respond to your request within one month of its reception. If we need to extend this period, we will inform you of the reasons for extension.
The response to your request will be sent to the email address from which you sent the request, and in the case of requests sent by post, by regular mail to the address you provided unless the content of the letter indicates an intention to receive feedback by email (in which case you should provide your email address).

Links to other websites

Where we provide links to websites other than ours, this Privacy Policy does not apply and does not describe the manner this entity processes your personal data. We encourage you to review the relevant

privacy policies of these entities on their websites.
The above information applies primarily to references to YouTube, Facebook, and LinkedIn, as well as to references to Chat GPT, Google Gemini, Claude or Perplexity.

Changes to the Privacy Policy

The Privacy Policy is subject to periodic review and update, as necessary. Below you can see the changes made so far.

September 2022

We have published a new version of the Privacy Policy where we describe in detail the processing operations that take place in connection with functioning of our website and the services we provide.

November 2023

We have supplemented Part II of this Policy with necessary information about data processing in connection with the launch of Fireflies.Ai Corp's AI voice assistant for online business meetings.

November 2024

We have updated particular legal bases for processing, purposes, data recipients and information about data transfers. We have added information regarding the recording of online meetings and telephone calls.

October 2025

We have added Slack Technologies LLC to the list of recipients, removed the outdated address of the UODO headquarters and introduced provisions relating to data processing for the purpose of verifying abuse of the Trial Period by Subscribers.

March 2026

We have updated the list of recipients in Part IV of the Privacy Policy to include Survicate S.A., headquartered in Warsaw.

November 2026

We have updated certain legal bases for processing, purposes, recipients of personal data and information on data transfers. We have added Part VII of the Privacy Policy, which describes the rules for processing personal data within the Thulium Academy.

Part II. Data processing via communication channels

Below, we present the rules for personal data processing that apply when you browse our website, send us a message via the contact form, request a call or start a chat, contact us using the contact details provided on the website or obtained in another way (e.g., a business meeting) or arrange a presentation of the Thulium System with us.

For what purposes do we process your data?

We process your personal data to answer your questions, present functionality of our Thulium System, present a cooperation offer and take further steps towards concluding a contract. If you talk to us on the phone, whether it is an outgoing or incoming call, we may record it temporarily to make sure we are providing you with the best service.
The specific purpose of data processing depends on the nature of your message to us.

The legal basis on which we process your data

The legal basis for your personal data processing is:

- Your consent expressed by sending us a specific question via the contact form, using the contact details available on the website or obtained in another way, functionality of the call request or chat start;
- Your consent expressed by arranging a presentation of the Thulium System with us, expressed by ticking the appropriate checkbox;
- Your consent expressed by continuing a telephone conversation, which is recorded;
- The necessity of activities aimed at concluding an agreement in the scope of presenting an offer and communication aimed at concluding a contract.

How long do we process your data?

We will process your data until you withdraw your consent and within the scope of activities aimed at concluding a contract, for duration of the conversations or negotiations. We will process recorded telephone conversations for up to 12 months.

Who is the recipient of your personal data?

The recipient of your personal data, i.e. an external entity that will participate in your data processing, will be our trusted subcontractors listed in Appendix no 2 of the Terms and Conditions of the Thulium Communication Application Service in the column “Website Users”.
The recipient may also be Slack Technologies LLC, Salesforce Tower 60 R801, North Dock Dublin, Ireland - an internal communication tool.

The nature of data provision

Providing your data is voluntary, but necessary to answer your questions or conclude a contract.

Other important information

Your data will not be subject to automated processing or profiling. During online meetings where we discuss potential terms of cooperation, we may use the AI voice assistant from Fireflies.AI Corp., which is used to record the meeting automatically and briefly and then provide a text summary of the meeting and established arrangements. Participation in the meeting means consent to the recording of the meeting for the above purpose. Once the summary has been created, the recording of the meeting is deleted. We may also use a video recording tool provided by Loom Inc. on similar terms as above. The use of tools from both of the above companies involves data processing outside the EEA, which takes place in the US and is based on participation of the above entities in the Data Privacy Framework Program.
Notwithstanding the above, as indicated above, we may record incoming and outgoing telephone calls. Our use of Slack means that data is transferred outside the EEA. Salesforce, the owner of this tool, processes data in the US, however, by participating in the Data Privacy Framework Program that is based on an EC decision issued to the US, it does this while ensuring an adequate level of security.

What are your rights?

Your rights are set out in Part I of this Privacy Policy.

Website visitors

Cookies

Like almost all websites, we also use cookies.

Cookies that serve to ensure the functionality, security and accessibility of the website are necessary for its proper operation. Thanks to these cookies, we know that you have accepted our Privacy Policy and Cookie Policy. We use these cookies on the basis of our legitimate interest.

Cookies used for statistical, marketing or preference purposes are optional, and we use them only on the basis of your consent.

For marketing, analytical and remarketing purposes, we use tools provided by suppliers such as: Google Ireland Limited (Google Analytics, Google Ads, YouTube), Google Cloud Poland sp. z o.o. (Google Cloud Platform, Gemini Enterprise Agent Platform), Meta Platforms Inc. (Facebook Pixel), LinkedIn Ireland Unlimited Company, Microsoft Ireland Operations Limited (Microsoft Ads, Clarity), Benhauer sp. z o.o. (Sales Manago).

You can read more about how we use cookies, their retention period and how to change your cookie preferences by clicking the CookiebotWidget icon in the bottom left-hand corner of the page.

Part III. Newsletter subscription

Below we present the rules for personal data processing that apply when you subscribe to our newsletter.

For what purposes do we process your data?

We process your personal data in order to provide you with marketing information about our services, news, promotions, offers that may be of interest to you as well as best practices in customer service.

The legal basis on which we process your data

The legal basis for your personal data processing is Your consent expressed by ticking the voluntary checkbox next to the relevant statement.

How long do we process your data?

We will process your data for duration of your consent until it is withdrawn. Withdrawal of consent will not affect lawfulness of the processing that has taken place so far.

Who is the recipient of your personal data?

The recipient of your personal data, i.e. an external entity that will participate in your data processing, will be our trusted subcontractors listed in Appendix no 2 of the Terms and Conditions of the Thulium Communication Application Service in the column “Website Users”.

The nature of data provision

Providing your data is voluntary, but necessary to receive commercial information in the form of the newsletter.

Other important information

Your data is not subject to profiling and is not processed outside the EEA.

What are your rights?

Your rights are set out in Part I of this Privacy Policy.

Part IV. Thulium Communication Application Service and Partner Program

Below we present the rules for personal data processing that apply when – as a natural person representing the Subscriber or Partner - you accept the Terms and Conditions of the Thulium Communication Application Service (you have the rights of the Owner pursuant to these Terms and Conditions) or the Terms and Conditions of the Thulium Partner Program, thereby entering into a

relevant agreement with us, being the owner of your own company or representing the Subscriber (Partner) on another basis (in particular, proxy, power of attorney).

For what purposes do we process your data?

We process your personal data as a person authorized to represent the Subscriber or Partner (in particular, a member of the Management Board, Plenipotentiary, Proxy) in connection with the conclusion of a specific agreement and the Owner's rights that you have while registering in the Thulium System or granting these rights to another User.
The purpose of processing of your personal data as a representative of the Subscriber is to fulfill our legal obligations, in particular accounting and tax obligations.
The purpose of your personal data processing is also our legitimate legal interest in marketing our own services, the need to consider complaints, establish, defend and pursue claims as well as create summaries, analyses and statistics for our internal needs.
When you talk to us on the phone, whether it is an outgoing or incoming call, we may record it temporarily to make sure we are providing you with the high quality of the service.

The legal basis on which we process your data

The legal basis for the processing of your personal data is the necessity to perform an agreement to which you are a party or in which you represent a Subscriber or Partner.
The legal basis for processing is also the obligation to comply with tax regulations as well as our legitimate legal interest in conducting marketing or analytical and statistical activities. The legal basis is your consent to our use of tools from Fireflies.AI Corp. or Loom Inc. to record the course of a conversation or meeting. The legal basis may also be your consent if you have agreed to marketing contact by telephone or electronic means.
The legal basis is also your consent expressed by continuing the telephone conversation with our Customer Service Office, which is recorded.
The basis for processing is also a legitimate legal interest that is the right to pursue claims or defend against claims as well as the ability to verify the Subscriber's abuse within the scope of use of the Trial Period.
The legal basis for processing is also your consent to receive a customer satisfaction survey in electronic form.

How long do we process your data?

We will process your data for duration of the agreement and, after its termination, for the period resulting from legal provisions or for the pursuit of legitimate interests, including: to secure and pursue any claims of the Subscriber (Partner) or defending against them until the expiry of the limitation period for these claims (i.e., for a period of 3 years after termination of the agreement/until the end of the calendar year after the expiry of 3 years from termination of the agreement and in the case of verification of the Subscriber's abuse of the Trial Period - 3 years from the end of the Trial Period).
We will process your personal data in order to fulfill legal obligations arising, among others, from provisions of the Accounting Act for a period of 5 years from the beginning of the year following the financial year in which the operations, transactions, and proceedings were finally completed, repaid, settled or expired.
We will process the data for duration of the consent until it is withdrawn.
We will process recorded telephone conversations for up to 12 months.
Completed customer satisfaction surveys will be stored for 6 months.

Who is the recipient of your personal data?

The recipient of your personal data, i.e. an external entity that will participate in your data processing, will be our trusted subcontractors listed in Appendix no 2 of the Terms and Conditions of the Thulium Communication Application Service in the column “Persons authorized to represent the Subscriber (Owners)/Partner.”
Depending on the needs, the recipient of your data may also be an entity providing legal and accounting services to us.

Your data will also be shared with Survicate S.A. to the extent necessary for the purpose of delivering the customer satisfaction survey.
Fakturownia sp. z o.o. will also be a recipient of your personal data, to the extent necessary to issue corrective invoices.

The nature of data provision

Providing your data is a contractual obligation. Failure to provide the data necessary to conclude the agreement will make it impossible to perform this action.

Other important information

Your data will not be subject to automated processing or profiling.
Your data may be processed outside the EEA. This happens when you participate in a meeting with us that we record using Fireflies tools AI Corp. or Loom Inc. The use of tools from both the above companies involves data processing outside the EEA, which takes place in the US and is based on participation of the above entities in the Data Privacy Framework Program.
Your personal data may be processed outside the European Economic Area (EEA). This occurs where we use tools provided by Anthropic Ireland Limited (Claude) or TypeSafe AI Inc. for the purposes of process automation and data analysis. The use of the tools of both of the above companies entails the processing of data outside the EEA, in the United States, on the basis of the participation of the above-mentioned entities in the Data Privacy Framework Program or on the basis of standard contractual clauses.
Your data may also be processed outside the EEA when we use tools to analyze the behaviour of Thulium System Users. This is based on the provider's participation in the Data Privacy Framework Program (MixPanel Inc.) or on an agreement containing standard contractual clauses (HotJar Ltd.).
Notwithstanding the above, as indicated above, we may record incoming and outgoing telephone calls.

What are your rights?

Your rights are set out in Part I of this Privacy Policy.

Part V. User of the Thulium Communication Application Service

Below, we present the rules for personal data processing that apply when you use the Thulium System as a User.

Which data do we process?

We process your data, such as: forename, surname, phone number and email address. We may process other data if you provide it to us (e.g. your voice in the case of the recorded phone call).
Furthermore, while you are using the services, the Thulium System automatically records specific information with the use of various technologies, such as:

- successful/unsuccessful login attempt,
- IP (if available),
- application ID,
- browser ID,
- session creation time,
- time of last session use (i.e. current time),
- license ID and information about the maximum number of accesses under the license,
- ID and name of the consultant

Where do we obtain your personal data?

We have received your basic contact details from your supervisor or employer in connection with conclusion of the agreement between us and the Subscriber, for the purpose of creating your User account and enabling you to use the Thulium System.

Where do we process your personal data?

We process your personal data as a User authorized to use the Thulium System in connection with conclusion of the agreement by the Subscriber and the purpose of processing your data as an employee or associate of the Subscriber is proper performance of the agreement concluded between us and the Subscriber.
The purpose of your personal data processing is also our legitimate interest in the need to consider complaints, establish, defend and pursue claims as well as create summaries, analyses and statistics for our internal needs.
When you talk to us on the phone, whether it is an outgoing or incoming call, we may temporarily record it to ensure a high level of service quality.

The legal basis on which we process your data

The legal basis for your personal data processing is the legitimate interest of the Subscriber and Thulium to perform the agreement concluded by the Parties, but also to consider complaints, establish, defend and pursuing claims as well as create summaries, analyses and statistics for our internal needs.
The legal basis is your consent to our use of tools from Fireflies.AI Corp. or Loom Inc. to record the course of the conversation or meeting.
The legal basis for your data processing is also the legal obligation arising from Regulation (EU) 2022/2065 of the European Parliament and of the Council of October 19, 2022 (the so-called Digital Services Act), which requires to take action to verify the Illegal Content you have reported.
The legal basis is also your consent expressed by continuing the telephone conversation with our Customer Service Office, which is recorded.

How long do we process your data?

We will process your data for duration of the agreement and after its termination for the period resulting from legal provisions or for the pursuit of legitimate interests, including: to secure and pursue any claims of the Subscriber or to defend against them until the expiry of the limitation period for these claims (i.e. for a period of 3 years after the termination of the agreement/until the end of the calendar year after 3 years from the termination of the agreement).
We will process recorded telephone conversations for up to 12 months.

Who is the recipient of your personal data?

The recipient of your personal data, i.e. the external entity that will be able to participate in your data processing, will be our trusted subcontractors listed in Appendix 2 to the Terms and Conditions of Thulium Communication Application in the column “Users - Part V. Privacy Policy.”
Depending on our needs, the recipient of your data may also be an entity providing legal services to us.
The recipient may also be Slack Technologies LLC, Salesforce Tower 60 R801, North Dock Dublin, Ireland - an internal communication tool.
Your data may also be made available to public authorities or bodies, but only to the extent necessary to fulfill our legal obligations, in particular those arising from the provisions of the Digital Services Act.

The nature of data provision

Providing your email address and telephone number is a contractual obligation. Failure to provide this data will make the proper performance of the agreement impossible.

Other important information

Your data will not be subject to automated processing or profiling.
Your data may be processed outside the EEA. This happens when you participate in the meeting with us that we record using Fireflies tools AI Corp. or Loom Inc. The use of tools from both the above companies involves data processing outside the EEA, which takes place in the US and is based on participation of the above entities in the Data Privacy Framework Program.
Your personal data may be processed outside the European Economic Area (EEA). This occurs where we use tools provided by Anthropic Ireland Limited (Claude) or TypeSafe AI Inc. for the purposes of process automation and data analysis. The use of the tools of both of the above companies entails the

processing of data outside the EEA, in the United States, on the basis of the participation of the above-mentioned entities in the Data Privacy Framework Program or on the basis of standard contractual clauses.
Your data may also be processed outside the EEA when we use tools to analyze the behavior of Thulium System Users. This is based on the provider's participation in the Data Privacy Framework Program (MixPanel Inc.) or on an agreement containing standard contractual clauses (HotJar Ltd.).
Notwithstanding the above, as indicated above, we may record incoming and outgoing telephone calls.

Our use of the Slack tool means transfer outside the EEA. Salesforce, the owner of this tool, processes data in the US, however, by participating in the Data Privacy Framework Program existing on the basis of an EC decision issued to the US, it does this while ensuring an adequate level of security.

What are your rights?

Your rights are set out in Part I of this Privacy Policy.

Part VI. Processing of data for the purpose of marketing our own services

The following information applies to a person - a representative of our potential customer - who we contact using data from publicly available sources, such as: LinkedIn or company websites, exclusively related to business activities.

For what purposes do we process your data?

We process your initial contact details in order to contact you and find out whether you are interested in mutual cooperation.
If your answer is positive, we process your data in order to make you a cooperation offer.

The legal basis on which we process your data

The legal basis for your personal data processing is:

- our legitimate interest - within the scope of basic contact details that you make publicly available on your professional profile on LinkedIn, on the website,or that you provide to us directly in another form. We have a legitimate interest in contacting you and offering you the opportunity to cooperate.
- Your consent to personal data processing expressed during telephone or email communication or via the LinkedIn portal, for your data processing in the future for the purpose of providing you with cooperation offers.
- The legal basis is your consent to our use of tools provided by Fireflies.AI Corp. or Loom Inc. to record the course of the conversation or meeting.

How long do we process your data?

We process basic contact details obtained directly from you or from publicly available sources only for the period necessary to establish contact, but no longer than 6 months.
If you consent to receiving cooperation offers from us, we will process your data until you withdraw your consent.

Who is the recipient of your personal data?

The recipient of your personal data, i.e. the external entity that will be able to participate in your data processing, will be our trusted subcontractors listed in Appendix 2 to the Terms of Service of Thulium Communication Application in the column “Potential Customers”.

The nature of data provision

Providing data is voluntary. However, please note that if you do not provide us with your data, we will not be able to establish cooperation.

Other important information

Your data will not be subject to automated processing or profiling. Your data may be processed outside the EEA. This happens when you participate in the meeting with us that we record using tools from Fireflies.AI Corp. or Loom Inc. The use of tools from both the above companies involves data processing outside the EEA, which takes place in the US and is based on participation of the above entities in the Data Privacy Framework Program.
Your personal data may be processed outside the European Economic Area (EEA). This occurs where we use tools provided by Anthropic Ireland Limited (Claude) or TypeSafe AI Inc. for the purposes of process automation and data analysis. The use of the tools of both of the above companies entails the processing of data outside the EEA, in the United States, on the basis of the participation of the above-mentioned entities in the Data Privacy Framework Programme or on the basis of standard contractual clauses.

What are your rights?

Your rights are set out in Part I of this Privacy Policy.

Part VII. Processing of data within the Thulium Academy

The information below applies to a User who uses our Platform, available at https://akademia.thulium.com/, to complete the Courses, which are intended to increase the effectiveness of use of the Thulium System.

For what purposes do we process your data?

The User's personal data is processed for the purposes of providing e-learning services, fulfilling legal obligations, handling complaints, sending marketing messages (where applicable), analysing the use of our services and improving our services.

The legal basis on which we process your data

The legal bases for processing the User's personal data are: necessity for the performance of the Access Agreement; compliance with obligations arising from legal provisions (fiscal obligations, DSA requirements); consent, in respect of marketing communications; and the legitimate interest of the controller, which is the conduct of marketing and analytical activities, defence against claims, pursuit of claims and handling of complaints.

How long do we process your data?

We will process your data for the duration of the Access Agreement and, after its termination, for the period resulting from legal provisions or for the pursuit of legitimate interests, including: for securing and pursuing any claims or defending against them, until the expiry of the limitation period for those claims (i.e. for a period of 3 years after the termination of the agreement / until the end of the calendar year in which the 3-year period from the termination of the agreement expires).

We will process your personal data in order to fulfil legal obligations arising, inter alia, from the provisions of the Accounting Act, for a period of 5 years from the beginning of the year following the financial year in which the operations, transactions and proceedings were finally completed, repaid, settled or became time-barred.

We will process data for the period of validity of the consent, until it is withdrawn.

Who is the recipient of your personal data?

The recipients of the User's personal data who participate directly in the processing of personal data connected with the provision of e-learning services are entities such as: LearnWorlds Ltd (the provider of the Platform), Certifier sp. z o.o. (the provider issuing certificates confirming completion of the Thulium Academy) and n8n GmbH (the provider of the process automation tool). Other entities which

may participate in an ancillary capacity in the processing of data are specified in Appendix No. 2 to the Terms and Conditions of the Application (column: Participants of the Thulium Academy, entry “YES”).

Nature of the provision of data

The provision of data is voluntary. Please note, however, that if you do not provide us with your data, we will not be able to conclude the Access Agreement with you.

Other important information

The processing of the User’s personal data directly connected with the provision of e-learning services takes place within the EEA, subject to the following reservation. Processing by LearnWorlds takes place within the EEA, whereas processing by LearnWorlds’ subcontractors takes place in the United States, with SCCs or the DPF applied. Other entities which may participate in an ancillary capacity in the processing of data and may process it outside the EEA on the basis of SCCs or the DPF are: Anthropic Ireland Limited, TypeSafe AI Inc., Fireflies.AI Corp. and Loom Inc.

What rights do you have?

Your rights are set out in Part I of this Privacy Policy.