

## Privacy Statement

### IP Address

When you call up a website on your browser, your current IP address is transmitted through your browser. Because this IP address is dynamic, sofatutor cannot trace this IP address back to you.

sofatutor saves users' IP addresses in order to prevent improper usage and improve our products. More detailed information about this is provided below.

### Cookies

Cookies are small files that can be saved from a website onto your computer. These files contain information that can be retrieved by the website the next time you visit said website. For example, cookies may contain details for identifying registered users in order to ensure secure communication with a website.

You can adjust your browser settings to prevent cookies from being stored on your computer. However, if you choose to do so, you will not be able to use sofatutor services to their full extent.

### Provided Data

sofatutor does not pass on the personal details you provide to us to third parties, insofar as this is not expressly stated in this Privacy Statement or you have not expressly approved of this data transmission.

### Payment Information

When you pay using a credit card, the payment information you provide is transmitted on behalf of sofatutor from 1&1 Internet AG's ipayment payment portal to the payment provider Postbank P.O.S. Transact GmbH (Credit Card Payment). sofatutor does not have direct access to the payment information you provide, but we do receive the last four digits of your credit card number as well as your card verification code from ipayment. P.O.S. Transact GmbH uses the information you provide to charge the cost of your subscription to your credit card on behalf of sofatutor.

Your payment information is only transmitted via encrypted connections.

sofatutor and ipayment both delete your payment information if you cancel your subscription or provide new payment information.

As of February 2, 2018, all direct debit or credit card payments from new sofatutor customers are processed via Stripe, a payment system service provided by Stripe Payments Europe Ltd., on behalf of sofatutor GmbH. Payments related to previous sofatutor contracts (i.e., renewals) will continue to be processed through ipayment and the aforementioned services, until you personally alter your payment data. Your payment data is transmitted only via encrypted connections. For more information, please consult Stripe's privacy statement at <https://stripe.com/us/privacy>.

When you pay using PayPal, PayPal sends us your email address and billing data after you have authorized this method of payment. sofatutor has no access whatsoever to the payment information associated with your PayPal account.

### Videos

We save information on which videos you watch when you are logged into your account so that we can provide you with viewing recommendations, show you your recently watched videos, and offer other, similar functionalities.

### Test Packages

If you have signed up for a sofatutor Test Package, we will save information on the subjects you have selected in a cookie on your computer so that we can provide you with the corresponding videos free of charge.

### Newsletter

We use the email address you provide for concluding the contract to provide you with additional information about sofatutor and recommend sofatutor products that could be of interest to you since they are similar to the product you have already purchased. You can opt out of receiving this information when you conclude your contract by unticking the 'Receive Newsletter' box. You can also opt out of receiving this information at any time by sending an email to [help@sofatutor.com](mailto:help@sofatutor.com).

sofatutor uses the providers Sendgrid (based in the US) and optivo (based in Germany) to send newsletters and offers via email. User names and email address are saved on these providers' servers. These providers may not use personal data for any purpose other than sending emails on behalf of sofatutor.

### Chat

The direct chat function for communicating with tutors or Support team members through our website is made technically possible by olark der habla Inc., a service provider based in the US. As part of enabling this service, olark forwards data on our logged-in users to our internal and external employees.

sofatutor can also commission third parties to provide support via chat. When doing so, general data on the user that is transmitted via the browser, such as data regarding which browser is being used, as well as additional customer data on logged-in customers (username, email address, and the subject/topic of the video in question) are transmitted so that we can provide support as efficiently as possible.



## Recording Your Registration

Right after you register with sofatutor, when you call up the next page your browser also sends a request to our American advertising partners Google AdWords, Bing Ads, and Facebook Ads as well as our German advertising partners Belboon, affilinet, and TVSMILES. In doing so, your browser communicates directly with our partners. This allows these partners to check whether a cookie has been saved due to previous interaction with the respective partner's advertising, and also lets them inform us of the number of registrations or purchases resulting from our users' interactions with this advertising.

## Third Parties/Advertising Partners

When you use sofatutor without being logged in as a registered user, our advertising partners Google AdWords (based in the US), ad4mat (based in Germany) and Facebook (based in the US) record this usage. In other words, when you call up the sofatutor page, your browser sends a request to these third parties. In doing so, your browser communicates directly with the respective third party. This third party receives your IP address through this communication and can save cookies on your computer. These cookies only contain information indicating that you are interested in sofatutor, so that you will see sofatutor ads (such as ones announcing special deals) on these advertising partners' pages. sofatutor does not access these cookies from these third parties, and also does not transmit any personal data to these advertising partners.

You can see our advertising partners' privacy statements at:

<https://www.google.de/intl/de/policies/privacy/ads/>

<https://www.ad4mat.net/de/datenschutzinfo.php>

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

## Web Analysis Services

sofatutor uses various web analysis services to review and improve our products. These services collect data on your usage behavior, browser, and settings. This information cannot be traced back to you, either by the web analysis service providers or by sofatutor.

These are the services we use:

**Google Analytics:** sofatutor uses Google Analytics, a Google Inc. service, to analyze and improve our products. Google Analytics uses cookies (small text files) saved on your computer to enable analysis of your sofatutor usage. The information about your sofatutor usage created by the cookies is transmitted to and saved on a Google server located in the US. sofatutor uses IP anonymization for Google Analytics. This means that Google shortens your IP address before it is transmitted through a member state of the European Union or a signatory state to the EEA Treaty, so that third parties cannot trace your IP address back to you. We can also use the data collected through Google Analytics to activate particularly relevant advertising for defined user groups (for example, visitors to a certain page on us.sofatutor.com) on other websites via Google AdWords. When doing so, we cannot identify individual users.

**Webtrekk:** sofatutor uses Webtrekk, a Webtrekk GmbH service. Webtrekk GmbH has been certified for Web Controlling Software data protection by TÜV Saarland. Part of the certification process involved conducting an on-site audit of Webtrekk's office in Berlin as well as of the hosting location — Webtrekk's tracking data collection and processing were reviewed for compliance with data protection and security regulations. Webtrekk collects data through requests sent from your browser to Webtrekk when you call up a page. Webtrekk thoroughly anonymizes your IP address and deletes it after processing.

**convert:** sofatutor uses the American service provider Convert Insight's convert service to conduct (A/B) tests on improvements to sofatutor.com. These tests involve showing a randomly selected group of our users possible site changes so that they can test these out. When they do so, a request is sent from their IP address to convert in order to collect information about their usage of the website for statistical purposes.

**unbounce:** sofatutor uses unbounce, a Canadian service, to keep interested parties well informed of our products and to help us continually improve our products. unbounce hosts some of our advertising campaigns on individual pages and provides sofatutor with an evaluation of interested parties' interactions with these campaigns. Your browser communicates directly with unbounce when you click on these campaigns so that your IP address can be transmitted and cookies can be saved on your computer.

**Scout and New Relic:** sofatutor uses American services Scout and New Relic to review sofatutor.com functions. A connection is established between these services and your browser, and a temporary cookie is created to analyze data such as the time it takes for certain parts of the site to load. Scout and New Relic send sofatutor a summarized evaluation of this data in such a way that sofatutor cannot trace the data back to individual users. Information about individual calls is only transmitted in cases where the site loads particularly slowly. Even in these cases, sofatutor cannot identify the user in question, or can only identify the user in question if he or she was logged into our site or if a problem occurred while personal data was being transmitted. Sofatutor does not transmit any additional user data to Scout and New Relic.

**Bugsnag:** sofatutor uses Bugsnag, a service provided by the American company Bugsnag Inc., to resolve sofatutor.com functionality errors and problems. In the case of an error, sofatutor transmits the IP address calling the site, user setting data (such as the browser being used), details on the site where the error has occurred, and data entered on said site to Bugsnag so that the error can be evaluated, categorized, and analyzed.

**wywy:** sofatutor uses the service wywy to evaluate our advertising performance. Your browser communicates directly with wywy so that your IP address can be transmitted and cookies can be saved on your computer. If you would like more detailed information about this, or you do not want your data to be transmitted, visit <http://wywy.com/wywy-opt-out>.

**MouseStats:** We occasionally use a MouseStats service to make our products more user-friendly. MouseStats is located at 1 Research Drive, Dartmouth, B2Y 4M9, Canada. Their web analysis service provides the mouse movements, mouse clicks, scrolling movements, and keystrokes (apart from ones used to enter personal data) for a given page. As is typical for external resources, your IP address is transmitted to this third party. However, it is only shown to us in anonymized form. You can prevent this data collection in advance at any time by clicking [here](#). Further information about MouseStats data protection is available [here](#).

## Social Networks

sofatutor uses various social network services. This involves establishing a direct connection between you and the respective US-based service so that said service receives your IP address and information about the site you are currently visiting. Since sofatutor is not included in this direct connection, we have no



influence upon the collected data and can only inform you of this data collection to the best of our knowledge. sofatutor does not transmit any additional data to these networks.

**Facebook Like button:** When you're logged into Facebook, Facebook associates information regarding your calling up the website with your Facebook profile. For example, you can click on this button to recommend our videos, blog posts, and magazine articles to your Facebook friends. You can find Facebook's Privacy Statement here: <https://www.facebook.com/about/privacy/your-info-on-other>

**Google +1 button:** Google only saves and processes, by their own admission, data collected through the +1 button if you're a logged in as a member. You can find further information about the +1 button and Google's data policy here: <https://www.google.com/intl/de/+/policy/+1button.html>

**Twitter:** If you're a Twitter user, you can share our articles by clicking on 'Tweet Article' or 'Tweet'. Further information about Twitter's data policy is available at: <https://twitter.com/privacy>

## Customer Surveys

sofatutor uses the services of Qualaroo and SurveyMonkey to provide a pop-up customer survey that appears at the end of the purchase process. As you complete this survey, your browser communicates directly with Qualaroo (based in Germany) or SurveyMonkey (based in the US). sofatutor does not transmit any additional data as a matter of principle, and receives a statistical evaluation of survey results that does not contain any personal details. In the case of some surveys, sofatutor transmits your customer number. However, Qualaroo and SurveyMonkey cannot use this number to acquire any personal details — the number is only provided so that sofatutor can associate the answers you provide with your customer account. When it comes to these kinds of surveys, you will be expressly notified before you submit your answers that we will associate these answers with your account.

## Criminal User Behavior

In the event of reasonable suspicion of a criminal offence, such as the fraudulent provision of a third party's bank account information, the data required for prosecution will be transmitted to the prosecuting authorities.

## Your Rights

You can request information about or, if desired, the deletion, locking, or correction of your data that has been saved by us or third parties working on our behalf at any time, without incurring any costs (apart from the costs of communication, such as phone bills or postage). You can assert your rights by sending an email to [datenschutz@sofatutor.com](mailto:datenschutz@sofatutor.com) or a letter to sofatutor GmbH, Customer Service, Gruenberger Strasse 54, 10245 Berlin, Germany. You can also submit an objection to anonymized data collection in the same way — when you do so, we will inform you of the next steps.

## Changes to These Provisions

Changes to legal requirements or our services may necessitate adjustments to this privacy statement. You can always view the currently applicable data protection provisions at <https://us.sofatutor.com/legal/privacy-statement>.