

Toshi Academy

PRIVACY POLICY

This Privacy Policy outlines the legal framework governing the collection and processing of personal data («personal identifiable information» or «information») by Take Profit s.r.o. («Toshi Academy», «Company», «we» or «us») provided by you («Customer» or «user»). As a company based in the Czech Republic, we process personal data in compliance with the General Data Protection Regulation («GDPR») and applicable Czech data protection laws, including Act No. 110/2019 Coll., on Personal Data Processing. The intent of this Policy is to address any concerns any Customer or visitor may have with regards to their data privacy and security and to emphasize the commitment of the Company to ensure sufficient privacy safeguards are in place.

We ask that you read this Privacy Policy («the Policy») carefully as it contains information about how we collect information from you, what we do with it and how you can control our use of the information.

INFORMATION COLLECTION

We may collect personally identifiable information (i.e. your name, postal address, telephone numbers, email address, date of birth and payment details) from you when you either submit an account registration form on any platform (Desktop or mobile) controlled by Toshi Academy, complete a request for information on any platform (Desktop or mobile), email or write to us requesting information, services or customer support. You will also be required to create a unique username and unique password for your account. This information is required in order to access our Services.

We may also receive personally identifiable information from you when you use our products and services or from our business partners, such as browser and cookie information (for more information about how we use cookies and similar tracking technologies on the Website, please refer to our Cookie Policy). In addition, we may also collect your IP address and technical information relating to the device you are accessing our websites from. We do not collect any personally identifiable information when you are on our site before you login or submit the form in the contact us area. We only use personally identifiable information to fulfil your requests for information or to render products or services to you. Should you choose to withhold the requested information, we may not be able to provide you with our Services.

We may also monitor your use of our website. This may include, but is not limited to, monitoring how many times and which pages you visit and the originating domain name of a user's internet service provided. This information helps us to build a profile of our Customers. Some of this data will be aggregated or statistical, which means that we will not be able to identify you individually.

INFORMATION USE

We collect and process the information with high regard to providing and maintaining the quality of our Services to you but also in order to protect and improve your experience at Toshi Academy. We process your personal data on the following legal basis:

- Consent: for marketing communications and certain optional features.
- Contractual necessity: to provide the services you have requested.
- Legal obligations: to comply with applicable legal and regulatory requirements.
- Legitimate interest: to monitor and improve our services.

Toshi Academy may collect the following information:

- A record of all internet communications and details of your visits to our Websites;
- Technical information relating to the device, such as device identifier, and browser you use to access our Websites;
- Communications with us or our employees, for example emails;
- Information regarding your location, including IP address;
- Any additional information you submit through the website for example in comment sections or in response to quizzes and questionnaires;

Third parties provide us with services to help us decide whether to accept transactions from you by assessing your method of payment and the devices you use to visit our website. This does not only protect you but also us. These third-party services perform checks to determine whether the device or chose method of payment has been identified with fraudulent or abusive transactions in the past, e.g. reported identity theft or credit card fraud.

INFORMATION SHARING AND DISCLOSURE

We will not sell your personally identifiable information to anyone. We will send personally identifiable information about you to other companies or people only when:

- We have your consent to share the information;
- We need to share your information to provide the Service you have requested;
- We need to send the information to companies who work on behalf of our company to provide a service requested by you;
- We are required to respond to regulatory or court orders or legal process; or
- We find that your actions on our Website violate the Terms, or any of our usage guidelines for specific services.

In order to provide the information or services you have requested from us, we may transfer or store your personally identifiable information on computer equipment or in offices that are located outside the European Economic Area (EEA). Any such transfer will be conducted in compliance with GDPR requirements, ensuring appropriate safeguards are in place to protect

your data, as outlined below under 'Storage of Personal Data'. To ensure a good quality of service we may monitor and record any communication you have with us whether in writing, by phone or by electronic mail. We recommend that with the exception of your name and username, you do not send us personal information by e-mail. Any information which you transmit to us is transmitted at your own risk.

ACCESS TO YOUR INFORMATION

You have the right to ask for a copy of your individual information that is being processed. In this case, Toshi Academy will provide the requested information without delay and at the latest within one month of receipt of a valid request. Should however a request be unfounded or excessive, Toshi Academy is in its right to:

- Charge a reasonable fee considering the administrative costs of providing the information; or
- Refuse to respond, provided we offer justification for such refusal.

In the event where you need to rectify your personal data, Toshi Academy will respond within a month and make the appropriate changes. Should you wish to either rectify or require a copy of your personal information, you must submit a request explaining what information you seek to acquire along with proof of identity to info@toshi-academy.com.

MARKETING

Toshi Academy reserves the right to process personal data for marketing purposes and in certain limited circumstances to provide this to our third-party partners for the purpose of marketing Toshi Academy Services and approved partner Services to you. We request your consent to market to you when you first fill out the form. You can choose not to receive marketing/promotional material at any time by clicking the unsubscribe link from promotional material being received or by contacting us at info@toshi-academy.com. If you have opted out of marketing from us, we will take all reasonable steps to ensure you no longer receive promotional material about Toshi Academy. This may affect your eligibility for certain promotions.

STORAGE OF PERSONAL DATA

The data we collect from you may be transferred to, and stored at, a destination outside the EEA. It may also be processed by staff operating outside the EEA who work for us, or for one of our suppliers. This includes staff engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your Personal Information, you agree to this transfer, storing or processing. Toshi Academy will take all steps reasonably necessary to ensure your data is treated securely and in accordance with this privacy policy. Some of our external third parties are based outside the EEA, so their processing of your Personal Information will involve a transfer of data outside the EEA. Whenever we transfer your Personal Information out of the EEA to third parties, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- we will only transfer your Personal Information to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission; or,
- where we use certain service providers, we ensure they adhere to specific contracts approved by the European Commission which give your Personal Information the same protection it has in Europe.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your Personal Information, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your Personal Information, we will use strict procedures and security features to try to prevent unauthorised access. We retain your personal information for as long as is necessary to fulfil the purpose for which it was collected. We may retain your personal information for longer if it may be the subject of a legal claim, or may otherwise be relevant for future litigation. When your data is no longer needed for these purposes, we will securely delete or anonymise it.

GENERAL INFORMATION

We reserve the right to change the Privacy Policy including altering the purposes for which we process your Personal Information. If we consider it appropriate to make any such change, the Privacy Policy will be updated and posted on our Website. Your continued use of the Website will constitute acceptance of those changes. If we make any material or substantial changes to this Privacy Policy we will use reasonable endeavours to inform you by email, notice on the Website or other agreed communications channels.