

Taxatic Privacy Notice

Introduction

This Privacy Notice (hereinafter - the **“Privacy Notice”**) regulates relationships between Teemy LLC, a Delaware registered company, USA – **“Taxatic”** or **“We”**, **“Our”**, **“Us”** and its individual and corporate Customers and website visitors – the **“Data Subjects”** or the **“Data Subject”**, or **“You”**, **“Your”**,

in relation to the processing of the Data Subjects’ personal data collected in the course of:

(1) applying for and attending Taxatic’s courses, either online or offline, such as those titled **“International Tax Basics”**, **“International Tax Structuring Basics”** and other courses and services later developed by Us (the **“Services”**);

(2) accessing and browsing Taxatic’s website at: www.taxatic.school (the **“Website”**); or

(3) in other ways and as part of other courses, programs, activities and services later offered, developed, and launched by Taxatic.

“General Data Protection Regulation” or the **“GDPR”** shall mean the Regulation of the European Parliament and of the Council (EU) 2016/679 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation). For the purpose of Our personal data compliance, the UK equivalent of GDPR and privacy laws of other EU countries which are not parties of the EEA, shall also be included into the GDPR scope and the Data Subjects from these countries will be treated as those from the GDPR zone.

“Personal data”, **“processing”**, **“possessor”**, **“disposer”**, **“controller”**, **“processor”**, **“pseudonymisation”**, **“profiling”**, **“restriction of processing”**, **“consent”** and other notions if used in the Privacy Notice shall be given the meanings set out in GDPR.

“Customer”, **“Instructor”** shall be ascribed the meanings given to them by the Terms of Service or a separate services agreement concluded between the parties.

“Website Visitor” shall be the Data Subject given the meaning described throughout the Privacy Notice.

What this section tells You about: We present You with substantial data processing tables (data processing records). These tables can provide You with insights on what data is collected and processed about You in every scenario, who can access this data, on which legal ground, for what purpose and what storage term for the data is

Please proceed to the next page

Data Processing Tables

Table No. 1

<p style="text-align: center;">Website Visitor's Data</p> <p style="text-align: center;">the Website Visitor may be either a first-time visitor, a prospective Customer or an existing Customer</p>					
Type of data	Legal ground	Aim/Purpose	Disposers	Transfer	Storage term
Data received automatically: IP address, geolocation, session id, device operating system, ID in Telegram, device resolution, browser (useragent) and other data of this kind	Protection of Our legitimate interests	To correctly display the webpage in the user's browser; prevent unlawful actions of visitors attacks, hacking	(1) Automattic Inc.; (2) software developers, web designers, business partners, consultants, and managers can access the data in the event of fixing bugs or for the purpose of getting aggregated statistical data; (3) Telegram Messenger Inc.	EU, USA	As long as the data is necessary/used
Name, surname, country of residence, contact details (email, phone number), ID in Telegram, courses being applied for, desired language of instruction, indication of corporate or individual status of the applicant, number of students applying for courses, payment details	Necessity to enter into a contract; legitimate interests	To reply to queries, communicate, arrange pre-contractual negotiations and communication; prevent unlawful actions; assess Your professional fitness/legibility to enroll in a particular course	(1) Automattic Inc.; (2) Zoom Video Communications Inc.; (3) Google LLC; (4) Microsoft Corporation; (5) business partners, consultants, managers, teachers, professors; (6) accountant, attorney, payment provider, bank; (7) Dropbox Inc.; (8) Telegram Messenger Inc.	EU, USA	As long as the data is necessary/used for conclusion of the contract, legitimate interests

Please proceed to the next page

Table No. 2

Business-to-Customer Scenario

where You are acting as Our individual Customer

Type of data	Legal ground	Aim/Purpose	Disposers	Transfer	Storage term
<p>Name, surname, country of residence, contact details (email, phone number), courses being applied for, desired language of instruction, indication of individual status of the applicant, number of students applying for courses</p>	<p>Necessity to enter into a contract; contract performance; legitimate interests in some instances</p>	<p>To address You, assess Your professional fitness/legibility to enroll in a particular course, accept, confirm and serve Your orders, respond to Your questions etc.</p>	<p>(1) Automattic Inc.; (2) Zoom Video Communications Inc.; (3) Google LLC; (4) Microsoft Corporation; (5) business partners, consultants, managers, teachers, professors; (6) accountant, attorney, payment provider, bank; (7) Dropbox Inc.</p>	<p>EU, USA</p>	<p>As long as the data is required under the contract, limitation period, legitimate interests, or legal requirements</p>
<p>Age, picture (IMG, PDF), Curriculum Vitae or reply to the following questions: 1) Please specify your university education and field of study (Law, Accounting, Economics, Business etc.); 2) What is your latest university degree earned (Bachelor, Master, PhD, no degree); 3) Please specify name of the university (of your latest graduation); 4) Please indicate the year of your latest graduation;</p>	<p>Necessity to enter into a contract; contract performance; legitimate interests in some instances</p>	<p>To address You, assess Your professional fitness/legibility to enroll in a particular course, accept, confirm, and serve Your orders, respond to Your questions etc. (provide the Services)</p>	<p>(1) Automattic Inc.; (2) Zoom Video Communications Inc.; (3) Google LLC; (4) Microsoft Corporation; (5) business partners, consultants, managers, teachers, professors; (6) accountant, attorney, payment provider; (7) Dropbox Inc.</p>	<p>EU, USA</p>	<p>As long as the data is required under the contract, limitation period, legitimate interests, or legal requirements</p>

Business-to-Customer Scenario

where You are acting as Our individual Customer

Type of data	Legal ground	Aim/Purpose	Disposers	Transfer	Storage term
5) Please provide the information about your current employment (particularly your name, country, field of work, and your current role at this work)					
Information created as a result of using Our Services	Necessity to enter into a contract; contract performance; legitimate interests in some cases	For serving Customers; remembering preferences, creating anonymized or personalised statistical data	(1) Automattic Inc.; (2) Zoom Video Communications Inc.; (3) Google LLC; (4) Microsoft Corporation; (5) business partners, consultants, managers, teachers, professors; (6) accountant, attorney, payment provider; (7) Dropbox Inc.	EU, USA	As long as the data is required under the contract, limitation period, legitimate interests or legal requirements
Payment details	Necessity to enter into a contract; contract performance; legitimate interests in some cases	For issuing invoices, processing payments, resolving payment requests and claims	(1) Google LLC; (2) Microsoft Corporation; (3) business partners, consultants, managers, teachers, professors; (4) accountant, attorney, payment provider, bank; (5) Dropbox Inc.	EU, USA	As long as the data is required under the contract, limitation period, legitimate interests, or legal requirements
Name, surname, country of residence, contact details (email, phone number), image	Consent	For distributing marketing emails, newsletters about	(1) Google LLC; (2) Microsoft Corporation;	EU, USA	Until consent is withdrawn

Business-to-Customer Scenario

where You are acting as Our individual Customer

Type of data	Legal ground	Aim/Purpose	Disposers	Transfer	Storage term
courses being applied for, desired language of instruction, indication of individual status of the applicant, number of students applying for courses and information created as a result of using Our Services		Our events, proposals, new courses and other occurrences; tag You on Facebook in connection with some event	(3) business partners, consultants, managers, teachers, professors; (4) Dropbox Inc.; (5) Facebook Inc.		

Table No. 3

Business-to-Business Scenario

where You are the Data Subject of Our Customer



Please note that in this scenario, as a rule, We don't interact with You directly in respect of Your personal data processing if You are an employee or the like in the company engaging Us. You should contact your possessor instead

Type of data	Legal ground	Aim/Purpose	Disposers	Transfer	Storage term
Your name, surname, country of residence, contact details (email, phone number), courses being applied for, desired language of instruction, number of students applying for courses	Determined by Your possessor	Determined by Your possessor Usually, the purpose is to address You, assess, accept and serve the Customer's orders, answer the Customer's questions etc. (provide the Services)	Upon Your possessor's instruction: (1) Automattic Inc.; (2) Zoom Video Communications Inc.; (3) Google LLC; (4) Microsoft Corporation; (5) business partners, consultants, managers, teachers, professors; (6) accountant, attorney, payment provider; (7) Dropbox Inc.	EU, USA	Determined by Your possessor
Information created as a result of using Our Services	Determined by Your possessor	Determined by Your possessor Usually, the purpose is to serve the Customers, remember preferences, create anonymized or	Upon Your possessor's instruction: (1) Automattic Inc.; (2) Zoom Video Communications Inc.; (3) Google LLC;	EU, USA	Determined by Your possessor

Business-to-Business Scenario

where You are the Data Subject of Our Customer



Please note that in this scenario, as a rule, We don't interact with You directly in respect of Your personal data processing if You are an employee or the like in the company engaging Us. You should contact your possessor instead

Type of data	Legal ground	Aim/Purpose	Disposers	Transfer	Storage term
		personalized statistical data	(4) Microsoft Corporation; (5) business partners, consultants, managers, teachers, professors; (6) accountant, attorney, payment provider; (7) Dropbox Inc.		
Information about the Customer's representative to enter into the contract with Taxatic and for Taxatic to render the Services (full name, address, contact details, representative's role etc.)	Necessity to enter into a contract; contract performance; legitimate interests	To process, sign, and perform the contract with a particular Customer; issue an invoice	(1) Automattic Inc.; (2) Zoom Video Communications Inc.; (3) Google LLC; (4) Microsoft Corporation; (5) business partners, consultants, managers, teachers, professors; (6) accountant, attorney, payment provider; bank; (7) Dropbox Inc.	EU, USA	As long as the data is required under the contract, limitation period, or legal requirements
Your name, surname, country of residence, contact details (email, phone number), courses being applied for, desired language of instruction, number of students applying for courses, information	Consent	For distributing marketing emails, newsletters about Our events, proposals, new courses and other occurrences; tag You on	(1) Google LLC; (2) Microsoft Corporation; (3) business partners, consultants, managers, teachers, professors; (4) accountant, attorney, payment provider;	EU, USA	Until consent is withdrawn

Business-to-Business Scenario

where You are the Data Subject of Our Customer



Please note that in this scenario, as a rule, We don't interact with You directly in respect of Your personal data processing if You are an employee or the like in the company engaging Us. You should contact your possessor instead

Type of data	Legal ground	Aim/Purpose	Disposers	Transfer	Storage term
created as a result of using Our Services		Facebook in connection with some event	(5) Dropbox Inc.; (6) Facebook Inc.		

Disposers and the Personal Data Processed by Them

What this section tells you about: We provide You with more clarifications as to what disposers We engage for running the Website, interacting with You, assessing, accepting and performing Your orders, and delivering the Services to You

For maintaining the Website, responding to Your questions, holding negotiations, performing Our commitments and delivering the Services to You, We currently use the following disposers:

- 1) Automattic Inc. Located at: 60 29th Street #343, San Francisco, CA 94110, United States of America;
- 2) Google LLC. Located at: 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA;
- 3) Microsoft Corporation, Located at: One Microsoft Way, Redmond, WA 98052-6399, USA;
- 4) Zoom Video Communications Inc. Located at: San Jose Headquarters, 55 Almaden Boulevard, Suite 400, 500, 600, San Jose, CA 95113;
- 5) Dropbox Inc. Located at: 1800 OWENS STREET, SUITE 200 SAN FRANCISCO CA 94158;
- 6) Facebook Inc. Located at: 1601 Willow Road, Menlo Park, CA 94025, USA;
- 7) Telegram Messenger Inc. Headquarters address: 71-75 Shelton Street Covent Garden, London, United Kingdom.

Automattic Inc.

Automattic Inc. features, among other products and services, the platform for website building and hosting which is used by Taxatic. When You access and browse the Website, Automattic Inc. may receive and process:

information that web browsers, mobile devices, and servers typically make available, including the browser type, IP address, unique device identifiers, language preference, referring site, the date and time of access, operating system, and mobile network information. Automattic Inc. also collects information about the actions that users perform on a site using their WordPress.com or Jetpack services — in other words, who did what and when (e.g., [WordPress.com username] deleted “[title of post]” at [time/date]).

Automattic Inc. may also collect and process other Personal data, please consult their privacy notice to get more information on this issue: <https://automattic.com/privacy/>.

Automattic Inc. may transfer the Personal data obtained and submitted through their services to their servers located in the United States. For the purpose of transferring the Personal data to third countries, including the United States, Taxatic relies on provisions set out in Article 44 of GDPR, depending on a specific event. We evaluated that the data transfers carried out by Our disposers will not interfere with personal lives of Our Customers and Website Visitors.

Google LLC

Products provided by Google LLC and used either on the Website or as a part of Our Services, currently cover:

- G Suite or Google Drive services;
- Google Meet; and
- Gmail service.

We use G Suite, Google Drive and the products and services maintained by this software tool, such as Google docs, Google sheets, Google presentations and others, to document communication with You, pre-contractual and contractual commitments, subject matter of Your orders, which courses You or the Company on whose behalf You are acting applied for, which courses You attended and completed, Your professional fitness and expertise to apply for Our courses, Our deliverables, Your feedback, recommendations and comments after attending the course lessons. In simple words, We use G Suite and Google Drive for any document and information workflows related with the Website and Services.

Google Meet serves as a communication tool for making calls and online meetings with You, with or without video. We can use Google Meet virtually for every client intake, for the taking of both pre-contractual and contractual steps prior to making any arrangements with You. Also, the foregoing tool may be used for contract performance, holding negotiations and discussions of issues, articulating Our responses to You, resolving of any misunderstandings and claims.

Gmail service is used for official corporate messaging with Our existing and prospective Customers, or the Website Visitors. Gmail can be utilized for sending You Our business proposals and offers, issuing invoices, delivering Our courses, educational materials, recommendations aimed at improving and facilitating Your skills and knowledge in the area of international taxation.

Google LLC may transfer the Personal data obtained and submitted through their services to their servers located in the United States. For the purpose of transferring the Personal data to third countries, including the United States, Taxatic relies on provisions set out in Article 44 of GDPR, depending on a specific event. We evaluated that the data transfers carried out by Our disposers will not interfere with personal lives of Our Customers and Website Visitors.

Microsoft Corporation

Microsoft Teams is used by Us for making calls and online meetings with You, with or without video. We can use Microsoft Teams virtually for every client intake, for taking both pre-contractual and contractual steps prior to making any arrangements with You. Also, the foregoing tool may be used for contract performance, holding negotiations and discussions of issues, articulating Our responses to You, resolving of any misunderstandings and claims.

Microsoft Office 365 applications package is used by Us as an offline tool to document communication with You, pre-contractual and contractual arrangements, subject of Your orders, Our deliverables, educational materials, recommendations aimed at improving and facilitating Your skills and knowledge in the area of international taxation.

Please consult the Microsoft privacy notice for more information on which data is collected and processed by Taxatic: <https://privacy.microsoft.com/en-us/privacystatement>.

Microsoft Corporation may transfer the Personal data obtained and submitted through their services to their servers located in the United States. For the purpose of transferring the Personal data to third countries, including the United States, Taxatic relies on provisions set out in Article 44 of GDPR, depending on a specific event. We evaluated that the data transfers carried out by Our disposers will not interfere with personal lives of Our Customers and Website Visitors.

Zoom Video Communications Inc.

We use the video conferencing tool provided by Zoom Video Communications Inc. to make calls and hold electronic meetings and negotiations, with or without video, with You.

Zoom collects and processes certain persistent identifiers and may set technical cookies for running their service. According to the Zoom privacy and cookie notices, they can collect and process:

Persistent Identifiers:

- Internet protocol (IP) addresses,
- Browser type,
- Internet service provider (ISP),
- Referrer URL,
- Exit pages, the files viewed on our marketing sites (e.g., HTML pages, graphics, etc.),
- Operating system, and
- Date/time stamp
- Approximate location (e.g., nearest city or town) Please see their [Cookie Policy](#) for more detail.

For EU member state customers, Zoom has implemented “zero-load” cookies, which means that cookies will not be put onto a browser of such Data Subjects until after preferences have been set. Data Subjects that are detected via IP address as coming from a EU member state,

upon their first visit to the zoom.us website, will be presented with a cookie-pop up box that allows cookie preferences to be set. These cookie preferences can also be changed at any time in the future by visiting the cookie preferences link at the footer of any page on our website (only visible to visitors with EU IP addresses). Please see more at: <https://zoom.us/gdpr>.

Zoom Video Communications Inc. may transfer the Personal data obtained and submitted through their services to their servers located in the United States. For the purpose of transferring the Personal data to third countries, including the United States, Taxatic relies on provisions set out in Article 44 of GDPR, depending on a specific event. We evaluated that the data transfers carried out by Our disposers will not interfere with personal lives of Our Customers and Website Visitors.

Dropbox Inc.

Dropbox Inc. features the Dropbox product for storing, processing, sharing and collaboratively working with documents and other files. We can use Dropbox as a substitution to G Suite by Google LLC with the same purpose as G Suite.

Please consult the Dropbox privacy notice for more information on which data is collected and processed by this company: <https://www.dropbox.com/privacy>.

Dropbox Inc. may transfer the data obtained and submitted through the Dropbox product to their group of companies and servers located inside and outside of the United States.

Facebook Inc.

We may launch and run corporate social media pages or event pages, community pages on such a platform as Facebook. We can see and collect the Personal data You leave through this platform if You interact with Our content published in there by sharing Our posts, videos, commenting on them, reacting to such materials and by carrying out other actions in these social media.

Also, We can, upon Your prior consent, tag You and use Your Facebook profile in connection with a particular event You participated in or under other circumstances.

Please look up what kinds of data Facebook Inc. may collect and process about You: <https://www.facebook.com/policy.php>.

Telegram Messenger Inc.

We are currently running a Telegram channel named "Taxatic" through which We keep You updated on the latest and most significant news and issues unfolding and being discussed in the area of international and cross-border taxation. For the time being, the channel is being supported in Russian only.

As an owner, creator, and technical moderator of the channel, We can access Your IDs and other similar indicators purely for Our technical legitimate interests in operating the channel. However, We are not using these IDs and other indicators for other purposes, except where You choose to send Us a query or question and We will reply to You accessing and using Your IDs.

Please look up what kinds of data Telegram Messenger Inc. may collect and process about You: <https://telegram.org/privacy>.

Your Rights in Respect of the Data Processing

What this section tells You about: We explain what rights You have in relation of processing Your data under the GDPR and elaborate on the storage term

As part of accessing and using the Website and Our Services, You shall be entitled to certain rights stipulated by the GDPR, such as the rights laid down in Chapter 3. Please note that exercise of some of those rights may not be possible due to Our inability to carry out Your full identification or due to other circumstances.

Your Personal data will be stored for as long as:

- (1) The data is necessary to provide You the Services and make the Website with all supported features accessible to You (please see the Data Processing Tables above for more guidance on the storage periods);
- (2) The data has been deleted upon Your respective request;
- (3) We have been mandated or ordered to permanently delete the Personal data We have about You by the court order or a legitimate authority's request;
- (4) in other circumstances stipulated by applicable laws.

In addition to Your rights relating to the data processing above, You are entitled to file a complaint with a competent data protection supervisory authority.

Security of Processing and Breaches

We will make our best efforts for prevention of any personal data breaches. If We find out the personal data breach, We will start the procedure of assessing risks to Your rights and interests and if such risks are expected to be serious and they cannot be mitigated by taking technical and organizational security measures, We will communicate information about this breach to

You as soon as possible, meanwhile taking all reasonable measures and making all efforts possible to mitigate the adverse consequences.

Contacts and Amendments to the Privacy Notice

What this section is about: We provide You with explanations as to how We will implement changes to this Privacy Notice and what communication channel You can send your questions to

You are welcome to send Your queries and questions related with the Privacy Notice and processing of Your personal data to: privacy@taxatic.school.

Amendments to the Privacy Notice may be presented in the form of the updated document. We also can arrange the updates by archiving the previous versions of the document accessible in the electronic form on the Website. Please check the Privacy Notice regularly to stay up to date with Our data processing activities.