

PRIVACY POLICY

Version 2.0 — Last updated: 2 July 2026 (replaces version dated 30 September 2022)

1. Who we are

This Privacy Policy explains how **VASCO CAVALHEIRO IT SERVICES SRL**, a private limited company under Belgian law with registered office at Square Ambiorix, 1000 Brussels, Belgium, trading as OnlineCourseHost.com (“OnlineCourseHost.com”, “we”, “us”), collects and processes personal data. For all questions about this Policy or your data, contact us at helpdesk@onlinecoursehost.com.

2. Who this Policy applies to — two different roles

Where we are the controller (this Policy applies): if you visit onlinecoursehost.com, create an account, use our platform as a course creator, contact our support, or receive our emails, we decide how and why your personal data is processed, and this Policy describes that processing.

Where we are a processor (this Policy does not apply): if you are a student, subscriber or contact of an online academy operated by one of our customers (a course creator), the creator — not us — is the controller of your personal data. We process it only on the creator’s behalf, under our Data Processing Agreement. For information about how your data is used, please consult the privacy notice of the academy you signed up with. If you send us a privacy request concerning a creator’s academy, we will forward it to the creator without undue delay.

3. What personal data we collect

- **Account data:** name, email address, password (stored hashed), account settings, and the information you add to your creator profile.
- **Billing data:** plan, purchase and invoice details. Payments are processed by our payment providers (Stripe, PayPal); full payment card data is processed by them directly and is not stored by us.
- **Usage data:** log data and device information generated when you use the Services (IP address, browser type, pages visited, timestamps), used for security and service operation.
- **Support data:** the content of your communications with our support team, processed through our helpdesk tool (Help Scout).
- **Marketing data:** your email address and engagement with our newsletters and product emails, if you have subscribed or are a customer.
- **Cookies and tracking data:** as described in Section 8, subject to your consent choices in the cookie banner.

4. Why we process your data and on what legal basis

- **To provide the Services (contract, Art. 6(1)(b) GDPR):** operating your account and academy, processing payments, providing support.
- **Marketing (consent or legitimate interest, Art. 6(1)(a)/(f) GDPR):** sending newsletters and product updates to subscribers and customers. Every marketing email contains an unsubscribe link; you can opt out at any time.
- **Analytics and advertising (consent, Art. 6(1)(a) GDPR):** measuring site usage and advertising performance through the tools listed in Section 8, only where you have consented via the cookie banner.
- **Security and service improvement (legitimate interest, Art. 6(1)(f) GDPR):** preventing abuse, securing the platform, diagnosing problems and improving features.
- **Legal obligations (Art. 6(1)(c) GDPR):** accounting, tax and other statutory requirements.

5. Who we share data with

We do not sell personal data. We share it only with service providers who process it for us, under data protection agreements:

- **Google Cloud Platform** — hosting and infrastructure (EU/US, EU-U.S. Data Privacy Framework certified).
- **Amazon Web Services** — email delivery (EU/US, DPF certified).
- **Stripe and PayPal** — payment processing (they process payment data directly, as described in Section 3).
- **Help Scout** — customer support communications (US, DPF certified).
- **Google Analytics, Google Ads and Meta (Facebook)** — analytics and advertising measurement, only with your cookie consent (Section 8).
- **Zapier / Pabbly** — integrations, only where enabled.

We may also disclose personal data where required by law or to protect our legal rights.

6. International transfers

Where personal data is transferred outside the European Economic Area (in particular to the United States), we rely on an adequacy decision — including the EU-U.S. Data Privacy Framework for certified providers — or on the European Commission’s Standard Contractual Clauses.

7. How long we keep your data

We keep account data for as long as your account exists, and thereafter only as long as required for statutory retention periods (for example accounting and tax law) or the defence of legal claims. Data in backup systems is deleted automatically through the expiry of our backup cycles. When an account is deleted, deletion is carried out through the verified deletion process described in our Terms, and residual backup copies are removed within 90 days.

8. Cookies and tracking

On your first visit, a cookie banner asks for your consent before any non-essential cookies are set. We use:

- **Essential cookies** — required for the site and platform to function (no consent needed).
- **Analytics** — Google Analytics, to understand how visitors use our site (consent required).
- **Advertising** — Google Ads conversion tag and the Meta (Facebook) pixel, to measure our advertising (consent required).

You can change or withdraw your consent at any time via the cookie settings on our site, and you can also control cookies through your browser settings.

9. How we protect your data

We apply technical and organisational security measures appropriate to the risk, including encryption in transit (TLS), encryption at rest on our cloud infrastructure, role-based access controls, automated weekly database backups with a 28-day retention and 7-day point-in-time recovery, and a mandatory two-step verified process for any account deletion or reset. These measures are described in more detail in Annex 2 of our Data Processing Agreement.

10. Your rights

Under the GDPR you have the right to access, rectify and erase your personal data, to restrict or object to its processing, to receive it in a portable format, and to withdraw any consent at any time (without affecting processing before the withdrawal). To exercise any of these rights, email

helpdesk@onlinecoursehost.com; we respond within the statutory deadlines. Note that for data held in a creator's academy, your request will be forwarded to the creator as controller (Section 2).

You also have the right to lodge a complaint with a supervisory authority — our lead authority is the Belgian Data Protection Authority (**Autorité de protection des données / Gegevensbeschermingsautoriteit**, www.dataprotectionauthority.be) — or with the authority of your habitual residence.

11. Children

The Services are intended for users aged 18 and over. We do not knowingly collect personal data from minors. If you believe a minor has provided us with personal data, contact us at helpdesk@onlinecoursehost.com and we will delete it.

12. Changes to this Policy

We may update this Policy from time to time. For material changes we will notify registered users by email before the changes take effect; for minor changes, the updated "Last updated" date serves as notice. Prior versions are archived and available on request.

13. Contact

VASCO CAVALHEIRO IT SERVICES SRL

Square Ambiorix, 1000 Brussels, Belgium

helpdesk@onlinecoursehost.com

End of Privacy Policy — Version 2.0, effective 2 July 2026. The prior version (30 September 2022) has been archived and is available on request.