**Privacy Policy** 

Please read this document carefully.

Last updated 04/27/2023

**Privacy Policy** 

### Version updated on April 2023

Hi! If you want to understand how Teachable and the other companies in Hotmart Company collect, store, use, share, and delete your personal data, you're in the right place. Depending on your activity on the Platform, some special rules may apply to you. So read the information below carefully.

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Teachable, and all the companies in Hotmart Company, are concerned about your privacy and are committed to preserving it. The processing of personal data related to your use of the services provided by Hotmart Company is described in this Privacy Policy, which should be read together with the Teachable <u>Terms of Use</u> and of the other companies in their business group, to the extent that you have a relationship with the respective companies.

Please read this Privacy Policy carefully before using the services offered by Hotmart Company, as the conditions outlined below are applicable to the processing of your personal data by the entities of Hotmart Company.

This Policy may be modified at any time, so it is important that you always review its terms. When substantial alterations are made to this Policy, you will be informed by email if you are a User registered on the Teachable Platform or with the services provided by Hotmart Company. This Policy and its respective updates prevail over any prior proposals, contracts, understandings or agreements, whether verbal or written, that may have existed between you and any one of the companies of the Hotmart Company, especially concerning privacy or personal data.

### Overview

 A. This Privacy Policy establishes the rules on (a) how and to what ends your personal data can be processed by Hotmart Company, (b) with whom these data can be shared, and (c) how the Users can manage their personal data. It applies to the use or access to the Platform or other services offered by Hotmart Company through any of their sites (including, but not limited to, <u>teachable.com, hotmart.com and</u> <u>enotas.com.br</u>) and their subdomains, as well as through other sites, interfaces or applications in which companies of Hotmart Company make their resources available, including

those applications on cell phones, tablets or other electronic devices.

B. To facilitate the reading of this Policy, we offer a <u>Glossary</u>, which gives the meaning of expressions beginning with capital letters in the Hotmart Company Terms, as well as in this or in other Policies of companies of Hotmart Company. Furthermore, it is important that you understand the specific meanings of the expressions below used in the context of protection of privacy and highlighted in the Terms, in this Policy or in other Policies of Hotmart Company companies without capital letters:

"Personal data", in the singular or in the plural, means any information that identifies the User or which makes their identification possible. So as generic as this may appear, personal data may be any information that identifies you directly or any information which functions as a piece in a puzzle that leads to your identification.

"Processing", as well as the verb "process", means any operation done with personal data, such as that which refers to the collection, production, receiving, classification, use, access, copying, transmission, distribution, processing, filing, storage, deletion, evaluation, control, modification, communication, transfer, diffusion or extraction.

"HotPay Services", Hotmart Company may allow their partners (such as financial institutions, payment institutions responsible for

the issuing of cards under the license of major credit card companies, the major credit card companies and correspondent banks) to offer their services in an aggregated form such as, for example, the provision of the Card to the Users, offered only to Users located within Brazilian territory. If the User opts for the Card, there may be terms and conditions of these partners that you must fulfill. These partners are mentioned in the <u>Policy of the</u> <u>Hotmart Card for Brazil.</u>

"Creator Content", When using Teachable Services (as defined in Teachable's Terms of Use), a Creator may upload, submit, or otherwise provide content to the Teachable Platform ("Creator Content"). The Creator is the owner of their Creator Content, and the sole Controller of any personal data included in their Creator Content ("Creator Data"). Teachable processes Creator Data on behalf of the Creator at the Creator's direction. Teachable is a Processor, as defined in the <u>Data Processing Agreement</u> and under applicable law, of Creator Content and Creator Data.

"Student Data", To connect Creators and Students and enable Creators to provide services to their Students, Teachable provides Creators with access to a limited set of personal data of Students enrolled in their services ("Student Data") as specified in this Privacy Policy. Teachable and Creators may each use Student Data for their own business purposes, at all times subject to the terms of the Data Processing Agreement, our Terms of Use, and our Privacy Policy. Teachable and Creators are each independent Controllers, as defined in the Data Processing

Agreement and under applicable law, of Student Data collected by Teachable that is accessed by or transferred to Creators.

### 1. PERSONAL DATA PROCESSED BY HOTMART COMPANY

Personal Data. The personal data processed by Hotmart Company ("User account Data" and "Creator account Data") may vary, in accordance with each one of the respective companies and their processing of personal data practices, as well as depending on the type of interaction of the User with the Platform or with each of Hotmart Company.

These personal data may be collected directly from the User, obtained from third parties or collected automatically.

The personal data may involve, by way of example: (a) registration information, such as email, full name, address, telephone, cell phone, social security number, ID number, driver's license number, profile photo, and passport; and (b) bank information, such as name of financial institution at which the User has a bank account, account number, type of account, branch, IBAN and credit card data, including the name of the holder, expiration and CVV code.

Below is a list of the personal data collected by Hotmart Company, shown in categories and different forms of collection for ease of understanding.

• <u>1.1 Personal Data collected directly from the User</u>. Hotmart Company may collect personal data directly from you, when

you, for example, set up an account, initiate a process of purchase directly via checkout and/or interact with Hotmart Company through any means, including by our chatbot.

- <u>12 Interaction "offline"</u>. Hotmart Company may collect personal data when you interact with them by means other than access through the Platform, such as, for example, your registration data or your image when you participate in an event organized by Hotmart Company or an event organized by a third party whose activity is contractually linked to Hotmart Company.
- <u>1.3 Optional fields</u>. The Platform provides certain fields for optional completion. These fields are marked as optional and have the purpose of improving the personalization of content provided to the User. The information you enter in these fields will be collected by Hotmart Company.
- <u>1.4 Public data</u>. Hotmart Company considers some personal data as public, because they may be seen by any person, within or outside of the Platform, including if this person does not have an account on the Platform. The information is considered as public data that you enter in the fields marked as "public data". You, other persons that use the Platform and Hotmart Company themselves may provide access or send public data to any person outside of the Platform. It is also possible to view, access, share once again or download public data through tools of third parties, as well as search

mechanisms, APIs and offline media, or through applications, sites and other Services of Third parties.

- <u>1.5 Personal data obtained from third parties</u>. Hotmart Company may have access to certain personal data through third parties, whether they be registration or bank information. This happens, for example, when, due to compliance with legal or regulatory obligation, Hotmart Company needs to consult databases maintained by third parties that enable the analysis of credit restrictions, anti-fraud analyses and other analyses of risk management integrated into the Platform. Hotmart Company also collects registration information through third parties when you sign up, connect to or log in to the Platform through a Third Party Service (for example, Facebook). Hotmart Company may also have access to the registration information through third parties for enrollment in events, surveys, publicity campaigns and other activities organized by these third parties, whose activity is contractually linked to Hotmart Company.
- <u>1.6 Personal Data collected automatically to access the</u> <u>Platform</u>. Personal data is collected automatically when you access the Platform, even if you do not have an account on the Platform. This information may include that given as examples below.
  - <u>1.6.1 Transaction payment information</u>: an instrument of payment used; date and time of the transaction; the

amount of the payment; date of expiry of the instrument of payment; billing postal code; IBAN information, address and other details related to the payment transaction.

- <u>1.6.2 Access or use information</u>: pages and content you view; searches by ads; frequency of use of the Platform; information about your browser; connection data; purchase history and browser history.
- <u>1.6.3 Device information and log data</u>: details on how you accessed and used the Platform (including links accessed); IP address; dates and times of access; hardware and software information; device information; device event information; exclusive identifiers (for example, Hotmart ID); fault data; cookies data and the pages you viewed or interacted with before and after accessing or using the Platform.
- <u>1.6.4 Cookies, pixels, and similar technologies</u>, as described in the Cookies Policy.
- <u>1.6.5 Participation in Creator content</u>. When you sign on to a course, Coaching service or use or access to other Creator content, we collect personal data relating to your participation in Creator content, such as courses you have enrolled on, test results, your progress and certifications.

- <u>1.7 Creators' payment information</u>. We use third party payment gateways to process payments made through the Platform. For payments processed by the native payment gateways of some of Hotmart Company, third parties provide us with information related to the payment status of your account, with you having to link your payment account to the Platform to receive your payments. When linking to your account, we receive certain information related to your payments, including the type of your payment card and its last 4 digits, your postal code, country of origin, date of expiration, and your email address associated with the type of payment. Besides this, we collect certain personal information for tax purposes, which may include your full name, address and registration number. Our outsourced payment gateways are independent and have their own privacy policies. For further information on how your payment data is processed and stored, we recommend that you analyze the privacy policies of the payment gateways.
- <u>1.8 Participation in Creator content</u>. When you enroll in a course, Coaching service or use or access other Creator content, we collect personal data relating to your participation in Creator content, such as courses you have enrolled on, test results, your progress, and certifications.

# 2. WHAT ARE THE PURPOSES OF PROCESSING YOUR PERSONAL DATA

- <u>2.1. Purposes of the processing of User Personal Data</u>.
  Hotmart Company may use the personal data for the following ends:
  - 2.1.1. Providing and developing the Platform:
    - Linking your account on the Platform with third-party social networks
    - Personalizing the Platform according to browser experience
    - Making analyses and studies related to behavior, interest, and demography
    - Improving the Platform
    - Filing purchase history
    - Updating registration
    - Sending messages, updates and account notifications
    - Carrying out User support activities
    - Permitting the User to publish their content
    - Publicizing User content through the means available on the Platform

• 2.1.2. Supplying and optimizing publicity and marketing

### activities

- Registration for events
- Sending newsletters
- Sending communications by email, SMS, or phone recordings
- Sending educational materials or eBooks
- Carrying out media campaigns focused on advertising and promotions
- Manually sending lists with media outlets (Facebook and Google)
- Sending communications, such as email marketing, remarketing and other advertising campaigns through media channels
- Analyzing browsing behavior for optimization of the Platform and the offering of products and services
- 2.1.3.Enabling HotPay Services
  - Communicating linked to payment, for example, such as the sending of transactional emails

- Participating in the arrangement with credit card companies
- Issuing electronic currency
- Accrediting and issuing payment instruments
- Managing payment account
- Converting physical currency into electronic currency
- Transferring of funds
- Applying the conditions of the terms of use of credit card and other policies involving the Hotmart Card
- 2.1.4. Maintaining a secure environment
  - Authenticating through the Platform
  - Verifying the authenticity of the data and documents supplied, including through processing and crossverification
  - Sending communications
  - Carrying out activities of fraud prevention analysis, security incidents and abuse on the Platform

- Guaranteeing physical security of Hotmart Company buildings
- Verification of registration
- Verification of content
- <u>2.1.5. Purposes of processing Visitor's Personal Data</u>. We may collect personal data of visitors to the Platform for the following purposes:
  - Media campaigns focused on advertising and promotions
  - Sending communications, such as email marketing, remarketing, and other advertising campaigns through media channels
  - Analyzing your browsing behavior on the Platform
  - Registration for events
  - Sending newsletter
  - Sending communications by email, SMS or phone recordings
  - Sending educational materials or eBooks

### 3. LEGAL BASES OF PROCESSING

<u>3.1. Legal Bases</u>. The processing of personal data by Hotmart Company is always founded on a legal basis provided for in the applicable legislation. The legal bases used by Hotmart Company may vary depending on the context of processing, and include the following:

- <u>3.1.1. Consent</u>. When the User accepts the processing of personal data, for example, when agreeing to receiving advertising or survey communications. This consent may be cancelled at any time by the User.
- <u>3.1.2. Compliance with legal or regulatory obligation</u>. When a Hotmart Company is obliged to process personal data due to a legal or regulatory determination, for example, such as when a Hotmart Company stores access records for the purposes of compliance with legislation on money laundering prevention.
- <u>3.1.3. Execution of Contract or procedures related to the</u> <u>Contract</u>. When the processing of personal data is necessary for the execution of a contract signed between a Hotmart Company and the data subject, or when necessary for procedures preliminary to the contract, for example, such as when we need to process your payment data at the time when you purchase on the Platform.
- <u>3.1.4. Exercising regular rights in a judicial, administrative or</u> <u>arbitral process</u>. When there is the need to process personal

data due to judicial, administrative procedure, or arbitral action.

<u>31.5. Legitimate interest</u>. When a Hotmart Company decides to proceed with the processing of personal data after a careful analysis involving the evaluation of the purpose and need of the processing the User and the expectation of the User in the processing of Personal Data. This legal basis is used when, for example, Teachable sends out a newsletter related to the User's interests, considering their interaction with the Platform to help in the support and promotion of Hotmart Company activities. In this case, Hotmart Company always allows the User the option to cancel the receiving of these communications.

# 4. PROCESSING OF PERSONAL DATA BY HOTMART COMPANY IN THE NAME OF THIRD PARTIES

 <u>41 Processing of Personal Data at the Request of Third</u> <u>Parties</u>. There is personal data processed by Hotmart Company at the request of third parties. Hotmart Company processes these personal data according to rules formalized with these third parties through written contracts. For example, the Creator may request, through the Platform, additional personal data from the Buyer ("Creator Data"). The types of Creator Data may vary depending on the specific orientation of the Creator.

- <u>4.2 Processing of Personal Data relating to HotPay Services</u>. Hotmart Company may also process certain personal data in the name of third parties when you opt to use HotPay Services. In transactions relating to Hotmart Card, Hotmart Company may collect the card number, the name of the holder, expiry date, CVV code, CPF (ID number) and payment transaction information in the name of a partner payment institution and from the credit card company.
- <u>4.3 Responsibility for the Processing of Personal Data by</u> <u>Third Parties</u>. The third parties referred to in the previous items are also processing agents responsible for the personal data in the context of offering their products and services.
   Particularly the third parties may be the Creators whose responsibilities and attributions are established in the Data Processing Agreement.
  - 4.3.1 In particular, the User who opts for the Hotmart Card, despite not having direct contact with the credit card company or the Hotmart partner payment institution, has a contractual link with these third parties and therefore is also linked to the terms of use and to the privacy policies applicable to these third parties.

### 5. RETENTION PERIOD OF PERSONAL DATA

 <u>5.1 Processing Period</u>. The personal data is processed by Hotmart Company until at least one of the circumstances described below is reached:

- Achieving the purpose of processing.
- The personal data is no longer necessary or pertinent to achieve the specific desired purpose.
- The end of the Contract with the User, for any reason.
- Exercising the right of revoking consent by the User, when the processing of personal data was done on the grounds of this legal basis.
- Penalization applied by the body responsible for taking care of, implementing and oversight of fulfillment of the legislation applicable, or by other competent bodies.
- <u>5.2 Conservation of Personal Data</u>. In certain situations, Hotmart Company may conserve the personal data residually even after the circumstances of the end of processing of personal data, due to compliance of a legal or regulatory obligation, or even in circumstances in which there is a legitimate purpose of Hotmart Company. In these cases, the personal data will be stored in a secure place with restricted access and for the time necessary to comply with the legal or regulatory obligation, or until the end of the legitimate purpose of Hotmart Company.
  - 5.2.1 The periods of conservation of the personal data are different and depend on the type of information and the objectives for which we use the information. For more

details on the period of retention of a given category of personal data, please contact our Data Protection Officer.

### 6. SHARING OF PERSONAL DATA

- 6.1 Hotmart Company only shares personal data with third parties in the circumstances described below. Hotmart Company does not sell or disclose the personal data collected for monetary purposes. These third parties sign a written contract with Hotmart Company and are aware of their responsibilities at each stage of the processing, principally of the duty to implement security measures that meet the requirements of the contract and of the legislation applicable.
  - <u>6.1.1 User Consent</u>. When you give your consent, we share your information as described at the time of the consent
    for example, such as authorizing the sending of personal data to third parties to enable participation in events.
  - <u>61.2 Compliance with the law, prevention of damages and security</u>. When there is a need to share personal data with third parties in order to (a) prevent fraud (for example, such as money laundering risk analyses), which may involve automated decisions; (b) verifying a list of Users with restrictions; (c) authenticating documentation sent; (d) enabling a support service; (e) avoiding illegal

activities; (f) proceeding matters of disputes between Users; (g) proceeding matters of internal investigations relating to any conduct which may violate the rules of the Terms or of the Policies of Hotmart Company.

- <u>61.3 HotPay Services</u>. The personal data may also be shared with third parties when the User, in any way, makes use of the HotPay Services, in particular when the User opts for the Hotmart Card. The personal data, including the card number, will be shared with the credit card company and with the partner payment institution of Hotmart Company. This sharing is for the purposes of processing payment, providing the card services, preventing, detecting and investigating any fraud or restriction lists, facilitating in resolution of disputes involving reimbursement or chargeback.
- <u>6.1.4 Between Companies of their Business Group</u>. The sharing of personal data may occur between the parent companies, subsidiaries, affiliated companies or ones under common control of Teachable, or any companies of Hotmart Company, to enable the Services of Hotmart Company, to generate administrative efficiencies and to facilitate the use of various services by the same User.
- <u>6.1.5 Service Providers</u>. Your personal data may be shared with third parties involved in the activities of financial, accounting, legal advice, non-profit activities and

potential investors, as well as third parties involved in the provision of data backup, cloud computing services providers or to carry out analytic studies.

- 6.1.6 Sharing User's Information with Creators. When you participate with Creator content, Hotmart Company will share certain information with the Creator to allow the Creator to supply the services to you. This information includes: (a) information of the account, such as your name and email address; (b) payment information , such as the amount paid, your address and other billing information, but never the complete number of your credit card; (c) your IP address; (d) information on your participation in the content of the Creator, including your enrollments, progress, results of tests and certificates; (e) any message you have exchanged with the Creator through the Platform.
- <u>6.1.7 Sharing Information of the Creator with Users</u>. When you use the Services of Hotmart Company to publish Creator content, information contained in your Creator content will be visible to the Users which have access to the Creator content. For example, when you publish your bio on the sales page, personal data from your bio will be visible to the people who visited the sales page.
- <u>6.1.8 With Integrated Services</u>. When you decide to integrate third party services on your Platform, your

personal data will be shared with these third parties. We recommend that you read the terms of use and privacy policies of these third parties to understand how they collect, use and share your personal data.

- <u>6.1.9 With Business Partners</u>. Sometimes we make partnerships with third parties to offer events, promotions, competitions and other programs. To take part in these offers, you may be requested to provide your email address and other personal data.
- <u>6.1.10 With Advertisers and Data Analytics Providers</u>. We may share your Personal Data with advertisers, advertising networks and providers of data analytics through cookies or other technologies.
- <u>6.1.11 With Affiliates</u>. We may share your personal data with our parent company, with affiliates or with other companies under common control. We may also share your personal data when transacting part or all of our business, such as the sale of a business unit, acquisition, merger, consolidation, or in the event of bankruptcy or judicial recovery.
- <u>6.1.12 With Governmental, Police Authorities or the</u> <u>Judiciary</u>. Hotmart Company may be obliged to share your personal data with governmental, police authorities

or with the judiciary, whenever necessary to comply with a judicial order or request from the respective authority.

### 7. INTEGRATION AND THIRD PARTY

- 71 You may permit that our Platform interacts with third party services (such as Facebook, Google, Zoom). The information you allow to be accessed by us depends on each service and may be affected by the privacy configurations that you and the others with whom you are connected establish when using the services. Third party services are operated, controlled and maintained by third parties, who have no relationship with us. We recommend that you read the terms of use and privacy policies of the respective third parties to understand how your personal data is collected, used and shared by them with us or with other third parties.
  - 7.1.1 Hotmart Company, in certain cases, may link services of third parties to the Platform by means of application programming interface (APIs), for example, such as the YouTube API. These third party services do not fall within the scope of the services of Hotmart Company and do not form part of the Platform, and are subject to different terms and conditions, such as the <u>YouTube Terms of Service</u> and the <u>Google Privacy Policy</u>. Hotmart Company is not responsible for these services and, when you interact with them, you are providing them with your personal data directly.

### **8. INTERNATIONAL TRANSFERS**

- <u>8.1 International Transfers</u>. Hotmart Company may transfer your personal data to countries other than that where you are located. Hotmart Company adopts the measures required by law, when such exists and is applicable, to ensure the protection of these personal data. In jurisdictions where the legislation or regulation in effect has no specific criteria or clear rules for international transfers of personal data, Hotmart Company will adopt good practices to protect your personal data, signing contracts with the receiving parties of the respective information that establish measures in accordance with the rules of the place where the personal data were collected initially.
- 8.2 In jurisdictions where Standard Contractual Clauses have already been approved by the competent bodies and represent proper documental safeguards to allow the international transfer of data to another jurisdiction, Hotmart Company will implement the respective Standard Contractual Clauses in their contracts with the receiving parties of personal data before making any international transfer.

### 9. RIGHTS IN RELATION TO YOUR PERSONAL DATA

 <u>9.1 Rights</u>: Depending on the law applicable to the processing of your personal data, you may have certain specific rights in relation to your personal information, which may be exercised through this <u>form</u>.

- A list of the applicable rights are given below:
  - <u>Confirmation of the existence of processing</u>. You have the right to ask us if we process your personal data, confirming the existence or otherwise of such processing.
  - <u>Access to the data</u>. You have the right to request a copy of your personal data processed by us, by electronic, secure and proper means or in hard copy, in accordance with your preference.
  - <u>Rectification</u>. You have the right to request the correction of your personal data that are incomplete, inaccurate or out of date.
  - Anonymization, blocking or exclusion. In cases where the processed data is unnecessary, excessive or not in accordance with the legislation, you have the right to request they are anonymized, blocked or even excluded.
  - <u>Portability</u>. You have the right to request the portability of your personal data to other content platforms, in the form of the regulation issued by the National Data Protection Authority, observing the commercial and industrial secrecy of Hotmart Company.

- Information on sharing. You have the right to request information about the public and private entities with which we share your personal data.
- Information on the possibility of denying your consent. You have the right to receive information on the possibility of not giving your consent, when the consent is the legal basis applicable to the processing of personal data, with the indication of the consequences of such denial.
- Revoking of consent. At any time, you have the right to easily and freely revoke the consent you have given previously. It is important that you know that the revoking of consent does not invalidate or make illegitimate the activities of processing of personal data that has been done prior to the date of the revoking.
- <u>Opposition to the processing</u>. In cases where the consent is not the legal basis applicable to the processing of your personal data, and when there is some non-compliance with the law on data protection, you have the right to request to oppose the processing, indicating your reasons for such. Hotmart Company will evaluate whether your opposition is justified or not, adopting the measures necessary to suspend the processing or inform the

grounds on which the processing is understood to be licit and permitted.

- <u>Complaint</u>. You have the right to file a complaint in relation to the processing of your personal data by Hotmart Company with the competent data protection authority. However, we hope that, before doing this, you will give us the opportunity to respond to any doubts or complaints you may have directly.
- Exclusion of data processed with consent. In cases where your consent is the legal basis for a given processing activity, you have the right to request the exclusion of these data, except where we continue to store the data as necessary for compliance with a legal or regulatory obligation, or for the defense of our interests in judicial, administrative or arbitral proceedings.
- 9.2 To speak with the person responsible for the personal data protection, get in touch using this <u>form</u>.
- 9.3 Whenever any Hotmart Company is acting in the name of third parties, and the User decides to seek satisfaction of their rights through a Hotmart Company, we may attend, in certain circumstances, to this request, if applicable.

- 9.4 If you wish to cancel the sending of newsletters, emails, telephone calls or SMS publicity, you may do this through the link provided in the communications themselves.
- **9.5** Teachable reserves the right to refuse to attend to requests that are manifestly unfounded and/or excessive.
- 9.6 All the rights above applicable in your jurisdiction may be exercised by you at any time, at no cost, except for the charging of a fee as permitted in accordance with the legislation or regulation in effect, and Hotmart Company undertakes to make their best efforts to attend to the requests transparently and in an agile manner.
- 9.7 To guarantee that the rights are being exercised by you or by your duly constituted legal representative, Hotmart Company may ask for the information or proof necessary of your identity, in order to avoid fraud and to guarantee your privacy, so that your personal data is not shared to those with no authorization for such.
- 9.8 We will attend to your requests within a reasonable period, in accordance with the applicable legislation, remembering that we shall only respond to some requests after having received the confirmations provided for above.
- 9.9 In certain cases, such as when your request is particularly complex or when we receive a high volume of requests at the

same time, our response may not be as quick as we would like it to be. On these occasions, we will always keep you informed and up to date with the progress of your request.

### **10. SECURITY**

- <u>101 Security Measures</u>. Hotmart Company employs security, technical and organizational measures necessary to protect the personal data processed. The efforts aim to mitigate the risk of the destruction, accidental or illegal loss, alteration, disclosure or unauthorized access or any other form of illegal or unauthorized processing. To this end, Hotmart Company has rigid controls of restricted access, based on levels of privilege, to the information technology systems to protect the personal data against any security incident. For more information, access the <u>Cybersecurity Policy</u>.
  - 10.1.1 Although Hotmart Company implement these measures to minimize the risk of security incidents and undue access, it is not possible to guarantee the absolute security of your data, especially against attacks perpetrated by ill-intentioned persons, who may be highly sophisticated and innovative, with techniques and methods unknown up to that point, even with the best information security tools.
  - 10.1.2 The security of your data will also depend on the adoption of reasonable measures by you in the use of your devices and software.

### 11. PROCESSING PERSONAL DATA OF CHILDREN

 <u>11.1 Personal Data of Children</u>. Hotmart Company does not collect nor consciously request personal data of children under the age of 13. If we become aware that personal data of a child under the age of 13 has been collected, we will cancel the account set up on the Platform and will exclude the personal data, only keeping personal data we have with the objective of avoiding any new attempt at registration.

### 12. CONTROLLER CONTACT INFORMATION

For Users located in the USA:

### Teachable, Inc. 470

Park Avenue South, 6th Floor

New York, New York 10016

For Users located in Brazil:

### Launch Pad Tecnologia, Serviços e Pagamentos Ltda.

Avenida Assis Chateaubriand, nº 499, Bairro Floresta

CEP 30.150-101

Belo Horizonte, Minas Gerais, Brazil

For Users located in the European Union:

### Hotmart B.V.

Spuistraat, 168

1012 VT

# Amsterdam, The Netherlands

## To speak with the DPO of Hotmart Company, use this form.

Join the more than 100,000 creators who use Teachable to share their knowledge. Easily create and sell courses, coaching, and digital downloads with our powerful yet simple no-code platform.

- Explore Company
- Features Careers
- Pricing Blog
- Examples Press
- Newsletter Partners
- teachable:hq
- Podcast

## Support

### Help Center

Privacy Policy

Terms of Use

**Content Guidelines** 

House Rules

Cookies Policy

Ethics Line

Accessibility



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