

Important Note: This MOTI Privacy Policy forms an integral part of and should be read together with the Learner Profile User Agreement (UA).

1. INTRODUCTION TO THE MOTI PRIVACY POLICY

- 1.1 Sophia is owned, supported, commercialised, and administered by MOTI and is the controller of Personal Data obtained via the use thereof; meaning MOTI is legally responsible for deciding how and for what purposes your Personal Data is used.
- 1.2 Please read this MOTI Privacy Policy carefully as it contains important information on who MOTI is, how and why it collects, stores, uses and shares any information relating to you (your **Personal Data**) in connection with your use of Sophia. It also explains your rights in relation to your Personal Data and how to contact MOTI or a relevant GDPR Regulator in the event that you have a complaint.
- 1.3 MOTI collects and uses Personal Data about you. When MOTI does so, it is subject to the EU General Data Protection Regulation (**EU GDPR**) in relation to the Sophia Services it offers to Individuals and to its wider operations in the European Economic Area (**EEA**).
- 1.4 Given the nature of Sophia, MOTI does not expect to collect the Personal Data of anyone under 18 years old. If you are aware that any Personal Data of anyone under 18 years old has been shared on Sophia, immediately contact MOTI so that the Personal Data can be deleted.

2. ARRANGEMENT OF THE MOTI PRIVACY POLICY

This MOTI Privacy Policy is divided into the following sections:

- 2.1 What this Policy applies to.
- 2.2 Personal Data MOTI collects about you.
- 2.3 How your Personal Data is collected.
- 2.4 How and why MOTI uses your Personal Data.
- 2.5 Marketing.
- 2.6 With whom MOTI shares your Personal Data.
- 2.7 How long your Personal Data will be kept.
- 2.8 Transferring your Personal Data out of Cyprus and EEA.
- 2.9 Cookies and other tracking technologies.
- 2.10 Your rights.
- 2.11 Keeping your Personal Data secure.
- 2.12 How to complain.
- 2.13 Changes to this privacy policy.
- 2.14 How to contact MOTI.

3. WHAT THIS POLICY APPLIES TO

- 3.1 This MOTI Privacy Policy relates to your use of Sophia only.
- 3.2 Sophia may interface or be used together with other third party Approved Systems owned and operated by certain trusted Individuals and Organizations to facilitate the creation of your Learner Profile, the subsequent

management thereof, the delivery of the Sophia Services to you, the payment of prescribed Service Fees, the managing (invoicing, receipting, recording) financial transactions related to your use of Sophia and to maximize your effective use thereof. Such Approved Systems may also gather information about you in accordance with their own separate privacy policies. For privacy information relating to those Approved Systems, please consult their privacy policies as appropriate or request a copy of the same from MOTI.

4. PERSONAL DATA MOTI COLLECTS ABOUT YOU

- 4.1 The Personal Data MOTI collects about you depends on the particular activities carried out on Sophia. If you do not provide Personal Data asked for where it is required, it may prevent MOTI/Sophia from providing the Sophia services to you, may result in the sub-standard delivery thereof or may otherwise adversely affect the effective use of your Learner Profile on Sophia.
- 4.2 MOTI collects and uses this Personal Data for the purposes described in the section '**How and why we use your Personal Data**' below.
- 4.3 MOTI will collect and use the following Personal Data about you:
 - 4.3.1 Your name, address, Country of Residence and contact information, including email address and telephone number.
 - 4.3.2 Information to check and verify your identity, e.g., date of birth
 - 4.3.3 The name of your Linked Organisation.
 - 4.3.4 The name of any Individuals or Entities in the Target Industry in whom you are interested or affiliated to.
 - 4.3.5 Countries, other than your Country of Residence, in which you are interested.
 - 4.3.6 Your Job Role, characteristics thereunder relevant to your professional life and your self-evaluated competency level for each.
 - 4.3.7 Your gender if you choose to give this to MOTI.
 - 4.3.8 Your location data if you choose to give this to MOTI.
 - 4.3.9 Your billing information, transaction and payment card or other payment method information.
 - 4.3.10 Your bank account and payment details.
 - 4.3.11 Details of any information, feedback, or other matters you give MOTI by phone, email, post or via social media.
 - 4.3.12 Your account details, such as username and login details.
 - 4.3.13 Your activities on, and use of, Sophia.
 - 4.3.14 Your personal or professional interests.
 - 4.3.15 Your professional online presence, e.g., LinkedIn profile.
 - 4.3.16 Information about the services MOTI provides to you.
 - 4.3.17 Your contact history, purchase history and saved items.
 - 4.3.18 Information about how you use Sophia and technology systems.
 - 4.3.19 Your responses to surveys, competitions, and promotions.

5. HOW YOUR PERSONAL DATA IS COLLECTED

- 5.1 MOTI collects Personal Data from you directly, when you enter or send MOTI information, such as when you create (or have created for you) or use your Learner profile on Sophia or when you use any of our third party Approved Systems, when you send MOTI feedback, purchase, and use Sophia Services, post Learner Content to Sophia, redeem Rewards on Sophia and complete customer surveys or participate in competitions via or related to Sophia, and
- 5.2 MOTI collects Personal Data from you indirectly, such as your browsing activity while on Sophia; MOTI will usually collect information indirectly using the technologies explain in the section on ‘**Cookies and other tracking technologies**’ below.

6. HOW AND WHY MOTI USES YOUR PERSONAL DATA

- 6.1 Under data protection Law, MOTI can only use your Personal Data if it has a proper reason, e.g., where you have given consent, if necessary to ensure MOTI compliance with Legal and regulatory obligations, if necessary for the performance of a contract with you or to take steps at your request before entering a contract and/or for MOTI's legitimate interests or those of a third party.
- 6.2 A legitimate interest is when MOTI has a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests. MOTI will carry out an assessment when relying on legitimate interests, to balance its interests against your own. You can obtain details of this assessment by contacting us (see ‘**How to contact us**’ below).
- 6.3 The table below explains what MOTI uses your Personal Data for and why.

What MOTI can use your Personal Data for	MOTI's reasons
To create and manage your Learner Profile on Sophia	<p>For its legitimate interests or those of a third party i.e., to facilitate the creation and securing of your Learner Profile so that you can safely and efficiently access Sophia Services.</p> <p style="text-align: center;">AND/OR</p> <p>To perform its Contract with you or to take steps at your request before entering into such Contract.</p>
To facilitate your access to and use of the System Services, Learning Services and Networking Services on Sophia	To perform its Contract with you.
<p>To facilitate delivery of the Data Services offered on or resulting from Sophia.</p> <p style="text-align: center;">In such cases, your Personal Data will be anonymised wherever possible and only shared where necessary or consented to.</p>	<p style="text-align: center;">To perform its Contract with you.</p> <p style="text-align: center;">AND/OR</p> <p>For its legitimate interests or those of a third party i.e., to offer and commercialize anonymised Data Services generated through the use of Sophia.</p>
Conducting checks to identify you and verify your identity or to help prevent and detect fraud against you or MOTI.	<p style="text-align: center;">To comply with any applicable Law.</p> <p style="text-align: center;">AND/OR</p> <p>For its legitimate interests or those of a third party i.e., to minimise fraud that could be damaging for you and/or MOTI.</p>

What MOTI can use your Personal Data for	MOTI's reasons
<p>To enforce Legal rights or defend or undertake legal proceedings.</p>	<p>Depending on the circumstances:</p> <p>To comply with any applicable Law.</p> <p>AND/OR</p> <p>For its legitimate interests or those of a third party, i.e., to protect its business, interests, and rights or those of others.</p>
<p>To customise Sophia, your Learner Profile and its content to your preferences and needs based on a record of your selected preferences or on your use of Sophia.</p>	<p>Depending on the circumstances:</p> <p>Your consent as gathered e.g., by you providing Personal Data on your Learner Profile, by your use of the Need Analysis Tool or Search functionalities thereon; see 'Cookies and other tracking technologies' below.</p> <p>AND/OR</p> <p>Where MOTI is not required to obtain your consent and does not do so, for its legitimate interests or those of a third party i.e., to be as efficient as it can be to deliver the best service to you at the best price.</p>
<p>Retaining and evaluating information on your recent visits to Sophia and how you move around different sections thereof for analytical purposes. This helps MOTI to understand how people use Sophia so that it can make it more intuitive or to check that Sophia is working as intended.</p>	<p>Depending on the circumstances:</p> <p>Your consent as gathered e.g. by your acceptance of MOTI Cookies or other use tracking tools —see 'Cookies and other tracking technologies' below.</p> <p>AND/OR</p> <p>Where MOTI is not required to obtain your consent and does not do so, for its legitimate interests or those of a third party, i.e., to be as efficient as it can be to deliver the best service to you at the best price.</p>
<p>Communications with you not related to marketing, including but not limited to changes to MOTI's UA, changes to the Sophia Services or other important notices.</p>	<p>Depending on the circumstances:</p> <p>To comply with any applicable Law.</p> <p>AND/OR</p> <p>In other cases, for its legitimate interests or those of a third party i.e., to be as efficient as it can be to deliver the best service to you at the best price.</p>

What MOTI can use your Personal Data for	MOTI's reasons
Protecting the security of systems and data.	<p>To comply with any applicable Law.</p> <p>AND/OR</p> <p>To ensure the security of systems and data to a standard that goes beyond its legal obligations, and in those cases, MOTI's reasons are for its legitimate interests or those of a third party i.e., to protect systems and data and to prevent and detect criminal activity that could be damaging for you and/or MOTI.</p>
Statistical analysis to help MOTI manage its business e.g., in relation to its financial performance, customer base, product range or other efficiency measures.	For its legitimate interests or those of a third party i.e., to be as efficient as it can be to deliver the best service to you at the best price.
Updating and enhancing customer records.	<p>Depending on the circumstances:</p> <p>To perform its Contract with you or to take steps at your request before entering such Contract.</p> <p>AND/OR</p> <p>To comply with any applicable Law.</p> <p>OR</p> <p>Where neither of the above apply, for its legitimate interests or those of a third party e.g., making sure that MOTI can keep in touch for the purposes of its Contract with you.</p>
Disclosures and other activities necessary to comply with Legal and Regulatory obligations that apply to its business e.g., to record and demonstrate evidence of your consents where relevant.	To comply with any applicable Law.
Marketing its services to existing and former customers.	<p>For its legitimate interests or those of a third party i.e., to promote its business to existing and former customers.</p> <p>See 'Marketing' below for further information.</p>
External audits and quality checks e.g., for the audit of MOTI, Sophia and Sophia Services.	For its legitimate interests or those of a third party i.e., to maintain its accreditations so that it can demonstrate that it operates at the highest standards.
To share your Personal Data with members of MOTI and Third Parties in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of MOTI's insolvency.	<p>Depending on the circumstances:</p> <p>To comply with our legal and regulatory obligations.</p> <p>AND/OR</p>

What MOTI can use your Personal Data for	MOTI's reasons
In such cases information will be anonymised where possible and only shared where necessary.	In other cases, for its legitimate interests or those of a third party i.e., to protect, realise or grow the value in our business and assets.

6.4 See **'Who we share your Personal Data with'** for further information on the steps we will take to protect your Personal Data where we need to share it with others.

7. **MARKETING**

7.1 MOTI may use your Personal Data to send you updates (within your Learner Profile on Sophia, by email, text message, telephone, or post) about the Sophia Services or Rewards available through your use thereof, including exclusive offers, promotions, or new products AND/OR services.

7.2 We have a legitimate interest in using your Personal Data for marketing purposes (see above **'How and why we use your Personal Data'**). This means we do not usually need your consent to send you marketing information. However, where consent is needed, we will ask for this separately and clearly.

7.3 You have the right to opt out of receiving marketing communications at any time by contacting MOTI or following the prescribed procedures within Sophia to manage marketing content visible to you.

7.4 We may ask you to confirm or update your marketing preferences on your Learner Profile in Sophia if you ask us to provide further marketing content in the future, or if there are changes in the law, regulation, or the structure of our business.

7.5 We will always treat your Personal Data with the utmost respect and shall use it strictly in accordance with the UA agreed between yourself and MOTI.

7.6 For more information on your right to object at any time to your Personal Data being used for marketing purposes, see **'Your rights'** below.

8. **WHO MOTI SHARES YOUR PERSONAL DATA WITH**

8.1 MOTI routinely shares Personal Data with:

8.1.1 Third Parties used to help develop, facilitate access to and deliver Sophia Services to you e.g., Trainers on Sophia, third-party Approved System providers (including but not limited to accounting systems, payment service systems), Sponsors, Reward partners etc.

8.1.2 Other third parties used to help MOTI run its business, support your use of Sophia and the Sophia Services e.g., advertising agencies, Sophia Hosting Partners, Sophia Agents, Sophia Consultants, and website analytics providers.

8.1.3 MOTI Banking, Investment and Funding partners.

8.1.4 MOTI Employees (full and part time), Directors and Shareholders where it is necessary for them to have access to your Personal Data for the purposes of MOTI's legitimate interests and performance of its Contract with you.

8.2 MOTI only allows those Individuals and Entities to handle your Personal Data if it is satisfied that they take appropriate measures to protect your Personal Data. MOTI also imposes contractual obligations on them to ensure they can only use your Personal Data to provide services to MOTI and to you.

8.3 MOTI or the third parties mentioned above may occasionally also need to share Personal Data with:

8.3.1 external auditors e.g., in relation to the audit of MOTI financials, in which case the recipient of the information will be bound by confidentiality obligations.

- 8.3.2 professional advisors (such as lawyers and other advisors), in which case the recipient of the information will be bound by confidentiality obligations.
- 8.3.3 law enforcement agencies, courts, tribunals, and regulatory bodies to comply with any MOTI obligation under Law.
- 8.3.4 other parties in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency—usually, Personal Data will be anonymized, but this may not always be possible, however, the recipient of the information will be bound by confidentiality obligations.

8.4 If you would like more information about who MOTI shares your Personal Data with and why, please contact MOTI (see ‘**How to contact us**’ below). MOTI will not share your Personal Data with any other third party.

9. HOW LONG YOUR PERSONAL DATA WILL BE KEPT

9.1 MOTI will not keep your Personal Data for longer than is needed for the purpose for which it is used. For example, MOTI will not keep a historic record of your Linked Organisation(s) and only retain information that you submit as regards the identity of your current Linked Organisation.

9.2 Different Retention Periods apply for different types of Personal Data. Further details on this are available by contacting MOTI.

9.3 If your Learner Profile is for any reason deactivated, we will delete or anonymise your Learner Profile data after seven years.

10. TRANSFERRING YOUR PERSONAL DATA OUT OF CYPRUS AND EEA

10.1 The EEA, UK and other countries outside the EEA and the UK have differing data protection laws, some of which may provide lower levels of protection of privacy.

10.2 It is sometimes necessary for MOTI to share your Personal Data to countries outside Cyprus and the EEA. In those cases, MOTI will comply with applicable Cypriot Laws designed to ensure the privacy of your Personal Data. This will apply, for example, when MOTI transfers your Personal Data to:

10.2.1 Sophia Agents based outside of the EEA or UK.

10.2.2 Trainers based outside of the EEA or UK.

10.2.3 Sophia Consultants based outside of the EEA or UK.

10.2.4 Any other service provider based outside of the EEA or UK.

10.2.5 Any Employee, Director or Shareholder based outside of the EEA or UK.

10.3 MOTI will also ensure all protections required by applicable Cypriot and EEA Laws are in place before transferring Personal Data to any Entity (or its subordinate Entities) governed by public international law or set up by, or on the basis of, an agreement between two or more countries (‘**International Organisations**’). This will apply, for example, when MOTI transfers your Personal Data to International Organisations constituting part of or being associated with the European Union, especially those from whom financing may be sought.

10.4 Any changes to the destinations to which MOTI sends Personal Data or in the transfer mechanisms it uses to transfer Personal Data internationally will be notified to you in accordance with the section on ‘**Change to this privacy policy**’ below.

11. COOKIES AND OTHER TRACKING TECHNOLOGIES

11.1 A cookie is a small text file which is placed onto your device (eg computer, smartphone or other electronic device) when you use Sophia. These are used to help Sophia recognise you and your device and store some information about your preferences or past actions.

11.2 A Cookie Notice will appear requesting your consent before they are placed. For further information on Sophia’s use of Cookies or how to disable them, please contact MOTI.

12 YOUR RIGHTS

12.1 You generally have the following rights, which you can usually exercise free of charge:

Access to a copy of your Personal Data	The right to be provided with a copy of your Personal Data
Correction (also known as rectification)	The right to require MOTI to correct any mistakes in your Personal Data
Erasure (also known as the right to be forgotten)	The right to require MOTI to delete your Personal Data—in certain situations
Restriction of use	The right to require MOTI to restrict use of your Personal Data in certain circumstances, eg if you contest the accuracy of the data
Data portability	The right to receive the Personal Data you provided to MOTI, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object to use	The right to object: At any time to your Personal Data being used for direct marketing (including profiling) In certain other situations to MOTI’s continued use of your Personal Data e.g., where MOTI uses your Personal Data for any reason other than its legitimate interests.
Not to be subject to decisions without human involvement	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

12.2 For further information on each of those rights, including the circumstances in which they do and do not apply, please contact MOTI (see ‘**How to contact MOTI**’ below).

12.3 If you would like to exercise any of your rights, please contact MOTI (see ‘**How to contact MOTI**’ below).

1. KEEPING YOUR PERSONAL DATA SECURE

13.1 MOTI has appropriate security measures to prevent Personal Data from being accidentally lost or used or accessed unlawfully. MOTI limits access to your Personal Data to those who have a genuine business need to access it. MOTI continually tests Sophia and its third-party Approved Systems to ensure compliance with industry standards for information security.

13.2 MOTI has procedures in place to deal with any suspected data security breach. MOTI will notify you and any applicable GDPR Regulator of a suspected data security breach when legally required to do so.

14 HOW TO COMPLAIN

14.1 Please contact MOTI if you have any queries or concerns about MOTI's use of your information (see below 'How to contact us').

14.2 You also have the right to lodge a complaint with:

14.2.1 The Commissioner for Personal Data protection in Cyprus (contact details of the Commissioner for Personal data protection in Cyprus may be found at http://www.dataprotection.gov.cy/dataprotection/dataprotection.nsf/contact_en/contact_en?opendocument).

14.2.2 A relevant data protection supervisory authority in the EEA state of your habitual residence or work.

15 CHANGES TO THIS PRIVACY POLICY

MOTI may change this privacy policy from time to time—when it makes significant changes it will take steps to inform you both on your Learner Profile and by email.

16 HOW TO CONTACT MOTI

16.1 You can contact MOTI by post, email or telephone if you have any questions about this Privacy Policy or the information MOTI holds about you, to exercise a right under data protection law or to make a complaint.

16.2 MOTI can be contacted by:

16.2.1 Email: websupport@mysophia.eu

16.2.2 Telephone: +357-22-040220

16.2.3 Post or Physical: Diagoras House, 16 Panteli Katelari Street, 1306, Nicosia, Cyprus