

Overview of the most important personal data processing related to services/products

Purpose	Basis	Personal data (see categories of personal data in Apollo Group's data protection terms p 4.2)
<p><b>Processing within the Apollo Club customer program (management – Apollo Group OÜ as the data controller; Club offering and data exchange by all Club offering entities as authorized processors, see p 1.3)</b></p>	<p>Joining the Club – consent; Offering Club benefits and services - necessary for entering into a contract (GDPR art 6 (1) b);</p> <p>Development activities, analytics and statistics, and marketing activities generally based on legitimate interest; consent if necessary.</p>	<p>Personal data (see categories of personal data in Apollo Group's data protection terms p 4.2)</p>
<p><b>Provision of services/sale of products</b></p>	<p>Contract (GDPR art 6 (1) b) if there is a contract with a natural person Customer; legitimate interest (GDPR art 6 (1) f) if it is the processing of personal data of representatives</p>	<p>General information, service usage information, communication data, payment information, communication, feedback/other, technical information (e.g., if the purchase is made through the online store)</p>
<p><b>Customer service</b></p>	<p>If the client/partner is a natural person - contract (GDPR art 6 (1) b), if related to contract support activities; other contacts - consent (GDPR art 6 (1) a) (if the person contacts themselves); if a representative – legitimate interest (GDPR art 6 (1) f)</p>	<p>Generally, information provided by the data subject themselves; however, all personal data may be processed depending on the situation</p>
<p><b>Providing better service and marketing – marketing activities - campaigns and lotteries, web and social media marketing and web marketing optimization activities, SEO activities</b></p> <p><b>Anonymization is also used</b></p>	<p>Legitimate interest (GDPR art 6 (1)(f))</p>	<p>Social media user information, name and email (if requested), information and results of participation in the game/campaign; technical information to the necessary extent; cookie information; depending on the campaign, service/product usage information may be required</p>
<p><b>Conducting market analyses and statistics</b></p>	<p>Legitimate interest (GDPR art 6 (1)(f))</p>	<p>Generally anonymous; however, if necessary and in the case of a positive</p>

<b>Anonymization is also used</b>		legitimate interest, general data, service/product usage information, feedback, and technical information may be processed to a limited extent
<b>Important notices related to services/products</b>	Contract (GDPR art 6 (1) b) if there is a contract with a natural person client/partner; legitimate interest (GDPR art 6 (1) f) if it is the processing of personal data of representatives	Contacts, specific service/product information to the necessary extent
<b>Service and IT development – to improve existing and develop new services and solutions, test technical solutions</b>  <b>Anonymization is also used</b>	Legitimate interest (GDPR art 6 (1) f)	Generally anonymous, but all data may be processed
<b>Enabling services - IT services for offering services, including server rooms and other software</b>	Contract (GDPR art 6 (1) b) and in parts not covered by the contract/if the data subject is not a party to the contract (if any) legitimate interest (GDPR art 6 (1) f)	All personal data
<b>Processing necessary for compliance with legal obligations</b>	Law (GDPR art 6 (1) c)	All personal data may be processed
<b>Data exchange within the group when using and providing group-wide services (generally related to the following topics: administration, management, supervision, auditing, accounting, marketing, business development, personnel)</b>  <b>Anonymization is also used</b>	Legitimate interest (GDPR art 6 (1) f); law (GDPR art 6 (1) c)	Generally non-personalized, but depending on the purpose, personal data may also be processed, e.g., in accounting information
<b>To prove and protect claims based on the fulfillment of a contract or other legal obligation or our legitimate interest, e.g., for preparing and responding to legal claims, inquiries, etc</b>	Legitimate interest (GDPR art 6 (1) f)	All personal data may be processed
<b>Ensuring cybersecurity and technical standards – activities to ensure the security of web and technical solutions, including making and storing backups and</b>	Legitimate interest (GDPR art 6 (1) f)	All personal data may be processed

<b>preventing/eliminating technical problems</b>		
<b>Ensuring security and proving requirements</b>	Legitimate interest (GDPR art 6 (1) f)	Information on video recordings, but all personal data may be processed depending on the situation
<b>Processing based on other legitimate interests (see e.g., p 5.3.5)</b>	Legitimate interest (GDPR art 6 (1) f)	See Apollo Group data protection terms p 5.3.5
<b>Processing within business transactions – merger, acquisition, purchase, sale of the entity or parts thereof – processing of data in the context of the transaction and advice</b>  <b>Anonymization is also used</b>	Legitimate interest (GDPR art 6 (1) f)	Generally non-personalized, but accounting information may be processed, and depending on the transaction, all personal data may need to be processed