

General privacy policy of Inside Culture Academy e.K.

Last change: 01.06.2025

This Privacy Policy describes how Inside Culture Academy e.K. ("we", "us") collects, uses and shares personal data when you use our services, access our website or communicate with us.

Changes to this privacy policy

We reserve the right to amend this Privacy Policy to reflect changes in our practices or legal requirements. Updated versions will be published on our website and marked with an update date.

Introduction

The protection of your personal data is of particular concern to us, the Inside Culture Academy (ICA). This privacy policy explains how we collect, process and protect your data.

Please note that our privacy policy is divided into two sections:

- **General Privacy Policy:** this applies to all services and products provided by Inside Culture Academy - e.g. intercultural training, coaching, webinars and community offerings.
- **Specific privacy policy for the online shop:** This additionally regulates the processing of personal data in connection with orders, payments and transactions via our online shop.

The booking and payment processing of our digital products is carried out by our partner **Digistore24 GmbH**, which acts as an **independent controller** in terms of data protection law. Digistore24's privacy policy can be found at: <https://www.digistore24.com/dataschutz>

By using our services and/or placing orders, you agree to both privacy policies.

Data processing by self-employed trainers

We work with qualified, self-employed trainers to organise coaching sessions, webinars and events. These trainers act independently and are not subject to any authority from the Inside Culture Academy (ICA).

In order to ensure the protection of personal data in the context of this cooperation, we conclude a data processing agreement (DPA) with all trainers involved in accordance with Art. 28 GDPR.

The processing of personal data by the trainers takes place exclusively for the following purposes

- Communication with participants
- Implementation of the agreed services (e.g. online coaching, webinars, courses)
- Preparation and follow-up of the content

Processed data may include the following categories

- Name, e-mail address, possibly telephone number of participants
- Booking and appointment information
- Relevant information on content support (e.g. course progress, questions from live sessions)

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The trainers are contractually obliged

- to treat the data received confidentially,
- to process it exclusively for the intended purpose,
- implement appropriate technical and organisational measures for data protection (in accordance with Art. 32 GDPR),
- and to delete the data after the end of the service, provided that there are no statutory retention obligations.

The data will not be passed on to third parties or used for other purposes. Subcontracting relationships require the prior consent of ICA.

Some of the course content and community elements of the Inside Culture Academy are also supervised by self-employed experts, including Katharina Wittig (intercultural trainer) and Dr Tanya Keni (intercultural psychologist). Both are not employed, but work on a freelance basis within the framework of service contracts for the ICA. Like all trainers involved, they are contractually bound to confidentiality, purpose limitation and data security. A data processing agreement in accordance with Art. 28 GDPR has been concluded.

What data we collect

Data provided directly by you

- Contact details: Name, address, e-mail, telephone number.
- Order data: Billing and delivery address, payment confirmation.
- Account details: Username, password, security questions.
- Customer support: Information from your communication with us.

Automatically recorded data

- Usage data: IP address, device type, browser, interactions with the website.
- Cookies: To optimize the services and analyze usage (see below: Cookies and tracking).

Legal basis for the processing

Your personal data is processed on the basis of the following legal bases in accordance with Art. 6 GDPR:

- To fulfill a contract: Processing of contact data, order data and payment information (Art. 6 para. 1 lit. b GDPR).
- On the basis of your consent: For marketing measures, such as the sending of newsletters (Art. 6 para. 1 lit. a GDPR).
- To safeguard legitimate interests: Analysis of website usage to improve our offer (Art. 6 para. 1 lit. f GDPR).
- Due to legal obligations: Storage of data for tax and accounting purposes (Art. 6 para. 1 lit. c GDPR).

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How we protect your data

We use suitable technical and organisational measures to protect your personal data and learning content in the best possible way:

Technical measures:

- - SSL encryption for secure data transmission, access restrictions through individual user accounts and two-factor authentication, regular system updates and daily data backups on servers within the EU.
- - The Memberspot course platform also protects all video content with digital rights management (DRM) and integrated copy protection to prevent unauthorised downloads or screen recordings. Content can only be accessed in streaming mode.

Organisational measures:

- - Employee training in handling personal data, documented processes for responding to data protection incidents, role-based access concepts and clear rules on data minimisation and purpose limitation.

Storage and deletion of data

Your data will only be stored for as long as is necessary for the respective purposes or as required by law:

- Contract fulfillment: Up to 6 years after termination of the contract.
- Tax and accounting data: 6 or 10 years in accordance with § 257 HGB and § 147 AO.
- Marketing data: Until your revocation or a maximum of 2 years after the last interaction.

Third-party providers and tools used

We use various platforms and tools to provide our services efficiently and securely. We ensure that all providers fulfil the requirements of the GDPR. Contracts for order processing (AV contracts) in accordance with Art. 28 GDPR have been concluded with providers who process personal data as part of an order.

1. platforms for communication and collaboration

- **Zapier**
Automation of workflows between tools.
Privacy policy: <https://zapier.com/privacy>
- **Google Workspace**
Management of email communication, forms, and documents.
Privacy policy: <https://policies.google.com/privacy>
- **Microsoft Office**
Creation and editing of documents.
Privacy policy: <https://privacy.microsoft.com>
- **Zoom**
Conducting online meetings, webinars and coaching sessions.
Privacy Policy: <https://explore.zoom.us/en/privacy/>

2. Platforms for Payment Processing

- **Digistore24**

Processing of orders and payment processes for digital products.

Digistore24 GmbH acts as an independent provider and processes personal data in accordance with the GDPR. The data processing includes order information, transaction data, customer email addresses, and IP addresses.

There is a **data processing agreement** in place, which was concluded through the Digistore24 seller account.

Privacy policy: <https://www.digistore24.com/dataschutz>

3. Tools for Accounting and Invoicing

- **Lexoffice (Haufe-Lexware GmbH & Co. KG)**

Management of accounting and creation of legally compliant invoices.

An AV contract has been concluded. Processing takes place exclusively on servers within the EU.

Privacy policy: <https://www.lexoffice.de/datenschutz>

4. Analysis and Marketing Tools

- **Google Analytics**

Analysis of user behavior to improve the website.

IP anonymization is enabled.

Privacy policy: <https://policies.google.com/privacy>

5. Platforms for Web Hosting and Domain Management

- **United Domains**

Management and hosting of our domains.

Privacy policy: <https://www.united-domains.de/unternehmen/datenschutz>

6. Tools for Community Management

- **Memberspot**

Provision of our digital learning platform, including community area, progress tracking, and certificate management.

Memberspot GmbH is our **central contractor for distance learning**, with a completed AV contract.

Privacy policy: <https://www.memberspot.de/datenschutz>

7. Platforms for Design and Content Creation

- **Canva**

Design of graphics, presentations, and marketing content.

Privacy policy: <https://www.canva.com/policies/privacy-policy/>

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Community use

- Visibility: Your actions (e.g. comments, likes) are visible to all members in the community area.
- Revocation: You can revoke your consent to the use of your data at any time at datenschutz@inside-culture-academy.de.
- For persons under the age of 18: Consent of legal guardian required.
- Use without consent: Only read access is possible without consent.

Cookies and tracking

Our website uses cookies to provide functions and improve your user experience:

- Essential cookies: For basic functions.
- Analysis cookies: To optimize the user experience.
- Advertising cookies: For personalized advertising.

Managing cookies: You can deactivate cookies in your browser. However, this may limit the functionality of the website.

Forwarding of data

- To service providers: For IT, shipping, payment processing and marketing.
- To public authorities: In case of legal obligation.

Your rights

You have the right to:

- Information: Request information about stored data.
- Correction: Have incorrect data corrected.
- Deletion: Have data deleted, if legally permissible.
- Revocation: Revoke your consent at any time.
- Objection: Restrict or stop processing.

Contact to exercise your rights: datenschutz@inside-culture-academy.de

Special conditions and student discounts

Authorization & proof

- Students with a valid certificate of enrollment can receive a discount for the "Cultural Onboarding Community & Premium Online Training" bundle.
- The discount is checked by sending a valid certificate of enrollment by e-mail to students@inside-culture-academy.de.

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- After successful verification, the personal discount code will be sent by e-mail.

Terms of use

- The discount code is non-transferable and cannot be combined with other discounts or promotions.
- ICA reserves the right to refuse proof of discount or to request additional information if there is any doubt as to its validity.
- The offer can be changed or discontinued at any time without giving reasons.

Data protection & processing of the certificate of enrollment

Purpose and legal basis:

Your data (name, e-mail address, certificate of enrolment) will be processed exclusively for the purpose of checking eligibility for the discount. The legal basis for this is Art. 6 para. 1 lit. b GDPR (contract fulfillment or pre-contractual measures) as well as our legitimate interest in the proper processing of the student discount (Art. 6 para. 1 lit. f GDPR).

Storage period and deletion

The transmitted enrollment certificates will be deleted within 30 days after your request has been processed.

Disclosure to third parties

The data will not be passed on to third parties and will only be processed internally.

Rights of data subjects

You can request the deletion or correction of your data at any time. You can find more information in this privacy policy or at datenschutz@inside-culture-academy.de.

Competitions and special promotions

General conditions of participation

- The Inside Culture Academy (ICA) occasionally organizes competitions and special promotions in which participants can receive prizes, discounts or free access to certain offers.
- The conditions of participation are defined separately for each campaign and communicated on the respective platform or website.
- Only natural persons over the age of 18 are eligible to participate, unless otherwise stated.

Exemplary actions

- The first X people to respond to a social media campaign will receive free access to the ICA community or certain offers.
- Prize draws among all participants who fulfill a certain task (e.. comment, e-mail submission or newsletter registration).

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Procedure & notification

- Winners will be notified by e-mail or direct message on the respective platform within a certain period of time.
- If a winner does not respond within 7 days, ICA reserves the right to pass the prize on to another person.

Abuse & exclusion

- ICA reserves the right to exclude participants from participation in the event of suspected fraud or abuse.
- Prizes are non-transferable and cannot be paid out in cash.
- Legal recourse is excluded.

Data protection & processing of personal data

Data collected:

- For discount campaigns (e.. student discount): Name, e-mail address, certificate of enrollment (PDF or photo)
- For competitions & special promotions: Name, e-mail address or social media profile name
- Purpose of the processing
- Checking eligibility for the discount or profit
- Notification of the winners
- Sending access data or prices

Storage duration

- Certificates of enrollment: Deletion within 30 days after verification
- Data for competitions and special promotions: Deletion within 60 days after completion of the promotion and dispatch of the prizes

Disclosure to third parties

The data will not be passed on to third parties and will only be processed internally.

Rights of data subjects

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Contact us

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