

PRIVACY POLICY FOR MOVES TO FREEDOM AS

1. Introduction

MOVES TO FREEDOM AS (org. no. **937651201**, hereinafter referred to as "**MTF**" or "**we**") is the data controller of the personal data we collect and process in connection with your use of our website, online course platform, and related services (collectively, the "**Services**").

This privacy policy gives you information about how and what personal data we process, how we process your personal data, to whom the data is disclosed and what rights you have.

This privacy policy is updated when needed, and the latest version is published here.

This privacy policy was updated on 2nd of August 2026

If you have any questions about this Privacy Policy or our processing of your personal data, please contact us at:

Company	MOVES TO FREEDOM AS
Address	Løvesvingen 11, 9104, KVALØYA, NORWAY
Email	nikoline.myrvang@gmail.com

2. Whose personal data does we process?

MTF receives, collects, stores, and otherwise processes personal data about the following categories of individuals (collectively, "**Data Subjects**"):

- Customers and potential customers using or enquiring about our Services
- Course participants and registered users of our online learning platform
- Visitors to our website and social media channels

3. What Personal Data Do We Process?

Personal data means any information relating to an identified or identifiable natural person (cf. GDPR Article 4(1)).

We process a range of personal data about Data Subjects, including:

Category	Examples
Identity & contact information	Full name, email address, phone number, postal address, employer name, job title
Account information	Username, password (hashed), organization name
Course & subscription data	Enrolled courses, progress, completion status, subscription validity, last login, active sessions
Billing & transaction data	Invoice details, payment history, purchase records
Communication data	Feedback, support requests, message history, marketing preferences
Technical & behavioural data	IP address, cookie data, browser type, device OS, pages visited, session duration — see Section 9

Personal data processed by MOVES TO FREEDOM AS is mainly collected directly from the Data Subjects, or through our customers having a direct relationship with the Data Subject (such as employment). In addition, the personal data may also be collected automatically when the Data Subject uses products developed on our software and other services e.g., when using our online services (including social media) and visiting our website.

We do not intentionally collect or process special categories of personal data (sensitive data) as defined in GDPR Article 9(1), such as data concerning health, racial or ethnic origin, political opinions, or religious beliefs. Please do not submit such information through our Services.

4. For What Purposes and on What Legal Basis Do We Process Personal Data?

We process personal data of Data Subjects to offer services and to maintain our relationship with our customers. In this context, personal data may be processed for the following purposes:

Purpose	Legal Basis (GDPR Art. 6(1))
Registration, enrolment, and delivery of	(b) Performance of a contract

courses and services	
Managing subscriptions and user accounts	(b) Performance of a contract
Processing payments and issuing invoices	(b) Performance of a contract / (c) Legal obligation
Customer service, feedback, and support communications	(b) Performance of a contract
Complying with accounting, tax, and product liability obligations	(c) Legal obligation
Presenting or defending legal claims	(f) Legitimate interests
Ensuring IT security, preventing fraud and abuse	(f) Legitimate interests
Product and service development and improvement	(f) Legitimate interests
Direct marketing and newsletters to existing customers	(f) Legitimate interests
Direct marketing to prospective customers	(a) Consent
Event and webinar registrations	(a) Consent / (b) Contract
Market research and customer surveys	(f) Legitimate interests / (a) Consent
Analytics and performance tracking (non-essential cookies)	(a) Consent — see Section 9

Where we rely on legitimate interests (Art. 6(1)(f)) as a legal basis, we have assessed that our interests are not overridden by your rights and freedoms, taking into account the reasonable expectations of Data Subjects and the nature of the processing. You have the right to object to such processing at any time — see Section 10.

Where processing is based on your consent, you may withdraw that consent at any time without affecting the lawfulness of processing carried out prior to withdrawal. To withdraw consent, contact us at nikoline.myrvang@gmail.com or use the unsubscribe link in any marketing email.

5. Who Do We Share Personal Data With?

We do not sell personal data to third parties. We may disclose personal data to the following recipients, strictly for the purposes described in Section 4:

- Public authorities, where required by law or by a binding legal order;
- Data processors acting on our behalf, including:
 - IT infrastructure and hosting providers
 - Learning Management System (LMS) vendors
 - Payment processors
 - Email marketing platforms
 - Analytics providers
- Professional advisors (lawyers, auditors) under confidentiality obligations;
- Potential acquirers or investors, in connection with a merger, sale of assets, or similar corporate transactions.

All data processors are bound by Data Processing Agreements ensuring personal data is processed only on our documented instructions and in accordance with applicable law. A list of current data processors is available upon written request.

6. International Transfers of Personal Data

Some of our service providers are located outside the EU/EEA. Where personal data is transferred to a third country, we ensure an adequate level of protection by applying one or more of the following safeguards:

Transfer to a country recognized by the European Commission as providing adequate protection (adequacy decision);

- Use of the EU Standard Contractual Clauses (SCCs) adopted by the European Commission;
- Such other appropriate safeguard as permitted under Chapter V of the GDPR.

You may request further information about the specific safeguards in place by contacting us at nikoline.myrvang@gmail.com

7. How Long Do We Retain Personal Data?

We retain personal data only for as long as necessary for the purposes for which it was collected, in accordance with the principle of storage limitation (GDPR Article 5(1)(e)).

Data Category	Retention Period
Account and course data	Duration of the customer relationship + 1 year after termination
Billing and transaction records	5 years from the end of the relevant accounting year (Norwegian Accounting

	Act)
Marketing communications	Until consent is withdrawn or you object
Technical logs and cookies	See Section 9
Legal claims documentation	Until the claim is fully resolved + applicable limitation period

After the applicable retention period, personal data is securely deleted or anonymized. We regularly review the necessity and accuracy of the personal data we hold and correct or delete inaccurate or unnecessary data without undue delay.

8. How Do We Protect Personal Data?

We take data security seriously. We have implemented appropriate technical and organizational measures to protect personal data against unauthorized access, loss, alteration, or disclosure, including:

- Encryption of data in transit (TLS) and at rest;
- Access controls and role-based permissions;
- Firewalls and intrusion detection systems;
- Regular security assessments and staff training;
- Data minimization practices.

Nevertheless, considering the cyber threats in modern day online environment, we cannot give full guarantees that our security measures will prevent illegally and maliciously operating third parties from obtaining access to personal data or absolute security of the personal data during its transmission or storage on our systems.

In the event of a personal data breach, we will notify the competent supervisory authority (in Norway: Datatilsynet) within 72 hours of becoming aware of the breach, where required under GDPR Article 33. Where the breach is likely to result in a high

risk to your rights and freedoms, we will also notify you directly without undue delay, in accordance with GDPR Article 34.

9. Cookies and Similar Technologies

A cookie is a small text file placed on your device when you visit our website and applications. Cookies allow us to recognize your browser across page views and sessions, store your preferences, and collect analytical data.

When you first visit our website, a cookie banner will ask for your consent to non-essential cookies. You may accept all cookies, configure your preferences, or reject non-essential cookies. You can change your preferences at any time via the cookie settings link in the website footer.

You can also manage cookies through your browser settings (disable all, allow all, or allow only first-party cookies). Note that disabling certain cookies may affect the functionality of the website.

We may use cookies to collect:

- User's IP-address
- Visited pages and time spent on page (analytics and performance)
- Browser type and info about operating system of a device
- Referral website and exit website after the session
- Information provided by you (subscription or contact form)
- Social media sharing information
- Openings and clicks of marketing emails

Third-Party Cookies

We use third-party services **Stripe/PayPal/WIX** that may set their own cookies. We do not have direct control over information collected by third-party cookies. Please refer to the respective provider's privacy and cookie policies for further information.

Types of Cookies We Use

Cookie Type	Purpose	Legal Basis
Strictly Necessary	Essential for the website and platform to function (e.g., login sessions, security)	Not required — strictly necessary

Functional	Remember your preferences and settings	Consent
Performance & Analytics	Collect anonymous data on how visitors use the site (e.g., pages visited, time spent)	Consent
Targeting / Marketing	Track browsing behavior across sites to deliver relevant advertising	Consent

10. Your rights

Under applicable data protection laws, Data Subjects have numerous rights related to the personal data. You may have the right to:

- Access the processed personal data.
- Obtain the rectification of inaccurate personal data.
- Obtain the erasure of personal data. However, please note that certain personal data is strictly necessary in order to achieve the purposes defined in this Privacy Policy and may also be required to be retained by applicable laws. Thus, you may not delete such personal data.
- Obtain restriction of processing.
- Receive the personal data, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from us.
- Object to the processing of your data where MOVES TO FREEDOM AS is relying on its legitimate interests as the legal ground for processing. For example, you may object to your personal data being used for marketing purposes at any time.
- Ask MOVES TO FREEDOM AS to restrict processing personal data for a period if data is inaccurate or there is a dispute about whether or not your interests override MOVES TO FREEDOM AS legitimate grounds for processing data
- The right to withdraw any consent given by you.

Data Subject may exercise the aforementioned rights by sending a written request to **nikoline.myrvang@gmail.com**

If you believe that MOVES TO FREEDOM AS has not complied with applicable data protection laws when processing your personal data, you can lodge a complaint with a supervisory authority. In Norway, the relevant supervisory authority is Datatilsynet.

11. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, services, or applicable law. We will notify you of material changes by email or by posting a prominent notice on our website. The date of the most recent revision is indicated at the top of this document.

We encourage you to review this Privacy Policy periodically.

12. Contact Us

For questions, concerns, or requests relating to this Privacy Policy or our processing of personal data, please contact us:

MOVES TO FREEDOM AS Løvesvingen 11, 9104 KVALØYA

Email: nikoline.myrvang@gmail.com Phone: +47 47244498