

# Privacy Policy

Updated 03-08-2025

## 1. Who are we?

Tribe is a service operated by Origin Ventures BV (hereinafter also referred to as 'tribe', 'us' or 'We'). We are a limited company registered in Belgium under company number 1020.376.454 and have our registered office at Lemmekenstraat 53, 1910 Kampenhout, Belgium. To contact us, please email [contact@tribeadmissions.com](mailto:contact@tribeadmissions.com).

## 2. About This Privacy Policy

This privacy policy (together with our Terms of Use, Acceptable Use Policy, and where applicable, the Education Provider's privacy policy), sets out the basis on which, if any, Personal Data we collect from you in relation to services provided through our website at <https://tribeadmissions.com>, or use of the services offered via the 'Platform' through the relevant education provider at <https://app.tribeadmissions.com> and its subdomains, a tribe website integration on the relevant education providers website, or the mobile app 'tribe' available on the IOS and Android app stores.

This Privacy Policy describes (i) how we collect, treat and store your personal data; (ii) the rights you can exercise in relation to your personal data; and (iii) the measures we take to protect it and to secure your personal data.

Do you have questions? Just drop our friendly legal team a message at [legal.team@tribeadmissions.com](mailto:legal.team@tribeadmissions.com).

## 3. Definitions and Interpretations

These Terms, unless the context otherwise requires, the following expressions have the following meanings:

<b>"Ambassador"</b>	means a member or representative of the Institution who has an account on the platform;
<b>"End User"</b>	means any individual that has access to or engages with the Platform, including Prospective parents, Ambassadors, administrators and other Education Provider Staff;
<b>"Consumer "</b>	means any End User, website visitor or job applicant;
<b>"Data", "Controller", "Data Processor", and "Supervisory Authority"</b>	have the same meanings as in the Data Protection Laws. Data protection laws including the General Data Protection Regulation (EU) 016/679 ("GDPR"), read in conjunction with and subject to the Data Protection Act 2018, in each case as amended, re-enacted or replaced from time to time;
<b>"Education Provider"</b>	means an institution or entity which provides education, such as a International School and which subscribes to a license to use the Platform;

<b>“Education Provider Staff”</b>	means an employee or authorized representative of an Education Provider who has access to the Platform;
<b>“Partner”</b>	means a third party that hosts the tribe widget on their website or an entity that has an established commercial relationship with tribe;
<b>“Personal Data”</b>	means any information that identifies or relates to a particular individual and also includes information referred to as “personally identifiable information” or “personal information” under applicable Data Protection Laws;
<b>“Prospective Parents”</b>	means an individual who is interested in and/or applies for a place at the Education Provider;
<b>“Tribe Chat”</b>	means the functionality within the Platform that allows End Users to engage in communications with the Education Providers selected Ambassadors and Education Provider Staff;
<b>“Tribe App”</b>	means the tribe mobile app which is available on the Apple and Android app stores;
<b>Principal Grounds that Justify the use of Personal Data</b>	<ul style="list-style-type: none"> <li>• <b>Consent.</b> Where you have consented to the use of your information (you are providing explicit, informed, freely given consent, in relation to any such use and may withdraw your consent by notifying us or the Education Provider),</li> <li>• <b>Contract performance.</b> Where your information is necessary to enter into or perform a contract with you,</li> <li>• <b>Legal obligation.</b> Where we need to use your information to comply with legal obligations,</li> <li>• <b>Legitimate interests.</b> Where we use your information to achieve the Education Provider’s legitimate interest and the reasons for using it outweigh any prejudice to your data protection rights, and</li> <li>• <b>Legal claims.</b> Where your information is necessary to defend, prosecute or make a claim against you or a third party.</li> </ul>

#### 4. How information is provided to us

You will be asked to provide us with your information when you:

- use our Website,
- fill in forms on our Website, Platform, or correspond with us by phone, email or otherwise,
- use the Platform (generally through a relevant education provider) or the mobile app,
- register to use our Platform (creating a Tribe account),
- report a problem with our Platform, or
- complete any optional surveys we ask you to fill in.

Where you enter any details relating to a third party, you must have obtained clear permission from the individuals whose data you provide us with before sharing that data with us.

For the avoidance of any doubt, any reference in this privacy policy to your data shall include data about other individuals that you have provided us with.

## **5. Information we collect about you, how we use your information, and justification of use**

Depending on your relation to Tribe, we collect different groups of data as either a DATA CONTROLLER or a DATA PROCESSOR. Which personal data we collect, store and process as a DATA CONTROLLER or DATA PROCESSOR, and the purpose for which we process this data may differ depending on your relationship with Tribe. The type of data collected, the use, and justification is listed below:

### **5.1. *Tribe acting as an Independent Data Controller***

Tribe will act as the **DATA CONTROLLER** of your personal data for the purposes described below:

In particular, we identify **three different scenarios**:

#### **5.1.1. You are **browsing** our website;**

When browsing on our website, we may collect your personal data through cookies stored on your device(s) in order to optimize the functioning of the Website. Please consult our **Cookie Policy** for more information.

Lawful basis – Subject Consent

#### **5.1.2. You are a prospect and are contacting us via one of the contact forms on the website;**

<b>Types of Data Collected</b>	<b>Use Justification</b>	<b>Lawful Basis</b>
Email, Name, Message	Answer questions and initiate communication	Subject Consent

#### **5.1.3. Your company is an active Tribe customer and/or seeking a commercial relationship with Tribe;**

<b>Types of Data Collected</b>	<b>Use Justification</b>	<b>Lawful Basis</b>
Name, Email, Physical Address, Company	Draw up quotes and/or proposals	Legitimate interest
Name, Email, Physical Address, Job Titles, Company, VAT Identification Number	Prepare invoices	Contractual necessity

### **5.2. *Tribe acting as a Data Processor***

Tribe will act as the **DATA PROCESSOR** of your personal data for the purposes described below:

In particular, we identify **three different scenarios**:

1. You're **an active Tribe End User** who accesses the platform (or the mobile app) to e.g. look through school ambassadors, and make use of the chat function; or,
2. You're **an active Tribe Ambassador** who has an ambassador profile, and communicates on the platform (or the mobile app); or,
3. You're **an active Tribe admin** who manages the platform.

5.2.1. You are an End User of the platform.

You were added/invited as an End User to the Tribe platform, or you accessed the platform yourself via an open access URL.

Types of Data Collected	Use Justification	Lawful Basis
First name, surname, email, password	To provide you with access to our Platform and any other information which you request from us and to notify you of changes to our Platform.	Legitimate interest
First name, surname, email, password	To enable you to communicate with Ambassadors using the Platform and other End Users	Legitimate interest
First name, surname, email	To send automated product communications to support the operation and your use of the Platform	Legitimate interest
First name, surname, email	To send automated product re-engagement communications for marketing purposes	Legitimate interest
First name, surname initial	Presented to the other users of the platform such that they are aware of who they are interacting with	Legitimate interest
Platform Activity	To administer and improve the Platform and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes in a pseudonymised manner. To conduct and facilitate user experience research, including to gauge feedback on new products and features in early stages of development, to determine whether those new products and features would be of sufficient value to users. To ensure the content on our Platform is presented in the most effective manner for you and your computer or mobile device.	Legitimate interest (to improve the Platform and report internally on usage and gain insight on user basis at a statistical level)

Conversation history and content, including any images, videos, etc. submitted when interacting with End Users and Ambassadors (as applicable).	To allow End Users to interact as part of the Platform. To provide a high-level summary of the conversational data to the Education Provider. To enable Education Providers to understand the types of questions prospective students are asking, to improve their service.	Legitimate interests to allow the Education Provider to assess the type of questions being asked and the quality and appropriateness of the responses.
Your photo, Nationality, and open 'About' text field.	To give the schools administrators, and the ambassadors you have chosen to contact on the platform an idea about who they are conversing with.	Consent (you have provided this information and have the right to edit or remove this information at any time).

#### 5.2.2. You are a platform ambassador.

You were added/invited as an ambassador to the Tribe platform. In addition to the data listed above under section 5.2.1. as an end-user of the platform, the following information is additionally collected:

Types of Data Collected	Use Justification	Lawful Basis
Information provided on your public profile, accessible through the 'edit profile' button - your photo; nationality; languages spoken; kids year groups; favorite subjects; favorite extracurriculars; living locations; favorite weekend activity; favorite local spot; bio (these data fields can be open to variation on the education providers request, and therefore can vary depending on the school you are being invited by)	To provide a public profile of the Ambassadors such that End Users can find the appropriate person to interact with.	Consent (you have the choice which information you want to provide, if any, and you have the right to edit or remove this information at any time).

#### 5.2.3. You are a platform admin.

You were added/invited as an admin to the Tribe platform. In addition to the data listed above under section 5.2.1. as an end-user of the platform, the following information is additionally collected:

Types of Data Collected	Use Justification	Lawful Basis
Your photo, job title, email address.	To enable personalization of the invite mails to ambassadors and End Users	Legitimate interest to allow

		your school to personalize the email invites.
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## 6. Disclosure of your information

Tribe shall not sell your personal data to any third parties. Tribe shall not disclose your personal data to other third parties, unless it is necessary to achieve the purposes described in this Privacy Policy. In this respect, (some of) your personal data may be disclosed to:

- Software and cloud providers
- Marketing agencies
- Freelancers or other service providers

Of course we have made sure that the necessary contracts or similar legal binding acts are in place to ensure that these third parties treat your personal data in accordance with the Privacy Legislation.

In addition, we might transfer your personal data:

- **To competent authorities:** for instance, because (i) we are obliged to provide your personal data under law or in the scope of (future) legal proceedings, or (ii) this is necessary to safeguard our rights; or,
- **In M&A (Mergers & Acquisitions) context:** meaning, if Tribe or the majority of its assets, is taken over by a third party, in which case your personal data – which Tribe has collected – may be one of the transferred assets.

## 7. How long we retain your Personal Data

Unless a longer storage period is required or justified **(i)** by law or **(ii)** through compliance with another legal obligation, Tribe shall only store your personal data for the period necessary to achieve and fulfil the purpose in question.

You may delete your account at any time, by emailing a deletion request to [contact@tribeadmissions.com](mailto:contact@tribeadmissions.com), following which your Personal Data will be immediately and securely deleted.

Some Personal Data may need to be retained for longer to ensure Tribe can comply with applicable laws and internal compliance procedures. If information is used for two purposes, we will retain it until the purpose with the latest period expires but we will stop using it for the purpose with a shorter period when that period expires.

We restrict access to your personal information to those persons who need to use it for the relevant purpose(s). Our retention periods are based on legal requirements and/or business needs and your information that is no longer needed is either irreversibly anonymized (and the anonymized information may be retained) or securely destroyed.

## 8. Where we store your personal information

Your Personal Data is maintained, processed and stored by us and our authorized Service Providers in Europe, the UK, and the US. Your Personal Data may also transit other locations as reasonably necessary for the proper performance and delivery of our global Platform, or as may be required by law.

Education Providers based outside the EEA may be subject to local data privacy legislation. A full list of our third-party Service Providers can be found below, which will be updated from time to time. By using our Platform, you agree with the Service Providers we use as listed below:

<b>Sub-processor</b>	<b>Purpose</b>	<b>Personal Data Processed</b>	<b>Storage or Access Location</b>	<b>Categories of Data Subjects</b>
Microsoft Azure	Cloud Service Provider for data processing & storage	All platform data and usage data	Europe	All platform users
Hetzner	Cloud provider for data processing & storage	All platform data and usage data	Germany	All platform users
Postmark	Automated email invites and notifications	First name, last name, and email address	US	All platform users

## 9. Your rights

The Privacy Legislation (e.g. GDPR) gives you certain rights over your personal data vis-à-vis Tribe. You can exercise these rights by contacting us at [legal.team@tribeadmissions.com](mailto:legal.team@tribeadmissions.com).

You have the following rights in relation to your Personal Data.

<b>Rights</b>	<b>Details</b>
<i>Right to access</i>	You have the right to access Personal Data held by the Controller(s), including a description of your data. All Personal Data processed is available on request.
<i>Right to rectification/correction</i>	You have the right to rectify any details to ensure that your personal information is accurate. In order to assist with this, you should notify the Data Controller of any changes to the personal information that you have provided by sending a request to rectify your Personal Data where you believe the Personal Data collected is inaccurate or incomplete.
<i>Right to erasure/ 'Right to be forgotten'</i>	Asking the Data Controller(s) to delete all of your Personal Data will result in the deletion of your Personal Data held by that Data Controller without undue delay (unless there is a legitimate and legal reason why the Data Controller is unable to delete certain Personal Data, in which case you will be informed of this in writing).

<i>Right to restriction of processing</i>	You have the right to ask the Data Controller to stop processing your Personal Data at any time in certain circumstances. Such a request will result in the Data Controller restricting its processing of such data.
<i>Right to data portability</i>	You have the right to request that the Data Controller provides you with a copy of all of your Personal Data and to transmit your Personal Data to another Data Controller in a structured, commonly used and machine-readable format, where it is technically feasible to do so where such processing is based on consent or pursuant to contractual performance.
<i>Right to complain</i>	You have the right to lodge a complaint to a Supervisory Authority. Although we encourage Education Providers to engage with us in the event they have any concerns or complaints.

To exercise the rights described above, you must send us a Subject Access Request/Valid Request that (1) provides sufficient information to allow us to verify that you are the person about whom we have collected Personal Data, and (2) describes your request in sufficient detail to allow us to understand, evaluate, and respond to it. Each request that meets both of these criteria will be considered a "Valid Request." We may not respond to requests that do not meet these criteria. We will only use Personal Data provided in a Valid Request to verify you and complete your request. You do not need an account to submit a Valid Request.

We will work to respond to your Valid Request within a 30-day period of receipt for all Valid requests under the GDPR.

You may submit a Valid Request by sending an email to [legal.team@tribeadmissions.com](mailto:legal.team@tribeadmissions.com); or by post to: Lemmekenstraat 53, 1910 Kampenhout, Belgium.

Where you exercise any of your rights above, the Data Controller may notify third parties to whom such Personal Data has been disclosed of such request. However, such third parties may have the right to retain and continue to process such Personal Data in its own right.

You also have a right to lodge a complaint with your national data protection supervisory authority at any time.

Although you have a right to contact your supervisory authority at any time, we kindly ask that you please attempt to resolve any issues with us first.

## **10. Cookies**

Tribe and our third-party partners, such as our analytics partners, use cookies and other tracking technologies (e.g., web beacons, device identifiers and pixels) to provide functionality and to recognize you across different Services and devices.

## **11. Third party websites**

Our website or platform may, from time to time, contain links to third party websites. If you follow a link to any of those third-party websites, please note that they have their own Privacy Policies and that we do not accept any responsibility or liability for their policies or processing of your personal information. Please check these policies before you submit any personal information to such third-party websites.



## **12. Changes to this policy**

We are entitled to update this Privacy Policy by posting a new version on the Website whereby we will indicate the revision date at the top of this Privacy Policy. As such, it is strongly recommended to regularly consult the Website and the page displaying the Privacy Policy, to make sure that you are aware of any changes. Your continued use of the Platform and the Website shall be deemed your acceptance of the varied privacy policy.

## **13. How can you contact us?**

If you have any further questions or would like to exercise any of the rights set out above, please contact us at [legal.team@tribeadmissions.com](mailto:legal.team@tribeadmissions.com). We always welcome your comments or suggestions, including thoughts on how we can improve or clarify this privacy policy.