

NovoLearn - Privacy Policy

1. General Information

1.1. We, **NOVOMATIC AG**, FN 69548b (the „Company“), process your personal data when you use our service or the related website (the „Website“ or „NovoLearn“). We handle your personal data confidentially and responsibly at all times. The processing of your personal data takes place in compliance with the General Data Protection Regulation (GDPR) and the Austrian Data Protection Act (DSG) in the currently valid version.

1.2. Through this privacy policy, we would like to inform you about the type, scope and purposes of data collection as well as data usage and further explain the processing of your personal data in detail.

2. Responsibility & Data Protection Contact

2.1. Responsibility

The person responsible for data processing within the meaning of the GDPR is the Company. You can contact us by e-mail at the following address (<https://www.novomatic.com/en/imprint>).

2.2. Contact Person Data Protection/Support

If you have any questions about the processing of your personal data, please contact us by e-mail at hr-data-dataprotection@novomatic.com.

For technical questions concerning NovoLearn please contact us at novolearn@novomatic.com.

3. Processed Data

As part of the provision of NovoLearn, we process your personal data ("Data") as set out in detail below:

3.1. Website-Data

When you visit NovoLearn or have been granted access to the website, we process only the following personal data, which are strictly necessary for participation in the group-wide e-learning programme. In addition, we process the following data, which are necessary for us

to display the website correctly, to ensure the required stability and security, and to be able to offer and provide the service to you:

- First name and surname
 - Login name
 - Passwords (hashed SHA-256)
 - Email address (if stored in the employee master data)
 - Modules (courses) used
 - Date of use
 - Processing Status and
 - Learning outcomes (if applicable, certificates)
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- the IP address of your device
 - the date and time of access
 - the request of the client
 - the http-response code
 - the volume of data transferred

3.2. Disclosure of own Data in NovoLearn

3.2.1. Profile Information

You can make the following adaptations in your profile:

- You can upload a profile picture,
- change the language and
- set the time zone.

3.2.2. Sensitive Data

No special categories of personal data ("sensitive data") are processed on the part of the Company.

3.3. Time of Data Processing

When you use our services, we process your Data:

- When it is delivered by the respective NOVOMATIC AG group company via secure channels and imported into NovoLearn.
- When you access, log in, log out or use the website.
- When you voluntarily update your personal profile (see 3.2.1.).

4. Reasons for Processing Data

4.1. Purpose

The processing of Data serves the following purposes:

- User-specific login,
- Correct provision of the website,
- Personalization of your experience with the services,
- Ensuring safety and security assurance, and
- Protecting our legitimate interests and legal rights.

4.2. Lawfulness

The lawfulness of processing Data according to Art. 6 para. 1 GDPR results from

- Your consent according to lit. a in the course of editing your profile (see 3.2.1.);
- The protection of the legitimate interests of the company or third parties pursuant to lit. f (see also 4.3.).
- For the performance of a contract pursuant to Art. 6(1)(b) GDPR within the scope of the employment contract or contracts with third parties

4.3. Legitimate Interests

The legitimate interests pursuant to Art. 6 para. 1 lit. f GDPR are to provide all employees of NOVOMATIC AG Group with a common e-learning platform for the Company's training program via NovoLearn. These trainings are mandatory for certain groups of people throughout the group and, in addition to raising awareness, also serve to ensure and comply with legal and/or regulatory requirements. Technical data is collected to monitor, analyze and improve the functionality of NovoLearn.

For the administration of local training programs and individual training progress, your Data will also be transmitted to the respective NOVOMATIC AG group company at which you are employed (Employer Company). This is done on the basis of legitimate interest pursuant to Art. 6 para. 1 lit. f in conjunction with Art. 4 Z 19 GDPR within the framework of a group of undertakings.

5. Data Transfer

5.1. General Transfer

We do not transfer your personal data to third parties, but data transfer may take place exclusively in the following cases:

- a) To our service provider, which provides support and maintenance services for NovoLearn as a data processor. This is Click&Learn GmbH, 4040 Linz, Petrinumstraße 12, AT.
- b) To the respective NOVOMATIC AG group company at which you are employed (Employer Company).
- c) In accordance with mandatory legal obligations, on the basis of an official or court order or on the basis of your consent.

5.2. Recipients of Personal Data

Your data will be processed exclusively within the Company and, with the exception of point 5.1, will not be transmitted to third parties.

Beyond that, no data transfer takes place.

6. Storage and Erasure / Data Deletion

6.1. Retention Period

We collect and store your personal data exclusively in accordance with the content of this Privacy Policy and the applicable data protection regulations, in particular the European General Data Protection Regulation (GDPR) and the Austrian Data Protection Act (DPA).

After your user account has been deleted or deactivated, we store data only if required by law (due to statute of limitations or retention periods) or as long as there is a legitimate interest for processing the data.

6.2. Deletion

Data will be deleted if you (a) validly revoke your consent to processing, (b) your Data is no longer required, or (c) processing is or becomes legally inadmissible.

7. Your Rights as Data Subject

You have the right

- pursuant to Art. 15 GDPR to request access to your personal data;
- pursuant to Art. 16 GDPR to request the rectification or completion of your personal data;
- pursuant to Art. 17 GDPR to request the erasure of your personal data;
- pursuant to Art. 18 GDPR to request the restriction of the processing of your personal data;
- pursuant to Art. 20 GDPR to request the transfer of your personal data, which you have provided to us, to you or to another controller;
- pursuant to Art. 21 GDPR to object to the processing of your personal data.

If you believe that the processing of your data violates data protection law or that your data protection rights have otherwise been infringed, you have the possibility to lodge a complaint with a supervisory authority. In Austria, this is the Austrian Data Protection Authority (www.dsb.gv.at), Barichgasse 40–42, 1030 Vienna.

To exercise the above-mentioned rights, please send a request by email to dataprotection@novomatic.com.

8. Cookies

8.1. What are Cookies?

The website uses small text files (cookies) that are placed on the user's computer, smartphone and/or stored by the browser. When the user of the services accesses the corresponding server of our website again, the user's browser sends the previously received cookie back to the server. The server can evaluate the information thus received in various ways. Cookies can be used, for example, to manage the user's settings.

8.2. Session-Cookies

To enable you to use the Company's service without restriction, we use so-called Session-cookies. Session-cookies are small information units that a provider stores in the RAM of the visitor's computer. A randomly generated unique identification number, a so-called Session-ID, is stored in a session cookie. In addition, a cookie contains information about the domain and the storage period. These cookies cannot store any other data.

You will find the details of the cookies in the following overview:

Cookie Name	Description	Expiration
PHPSESSID (or PHPSESSIDxxxxx)	The PHP session cookie. Used by the system to identify a logged-in user	When the browser session ends
support_pdf	A Boolean value indicating whether the client supports native PDF preview	When the browser session ends
CartId	A numeric identifier for the shopping cart used to link visiting customers to actual users once they log in	7 days
c_request	A URL used to fulfill deep-linking requests for returning users	5 minutes

ef_submit_users	A URL that stores a user's preferred return URL when the user is created	When the browser session ends
ef_user	Contains a hash code used to implement the optional "Stay logged in" features for returning users	1 month
bypass_skill_test	An integer that stores the user's preference regarding the time at which a skill gap test should be taken	24 hours
MyCoursesPersonalization	Stores the show/hide status of the "My Courses" list for a user	When the browser session ends
cookieTableRows	These cookies are set by the client (not the server) and contain information about the user's display settings	When the browser session ends
collapsed		
navbar_hidden		
side_hidden		
theme_page_id		
Announcement_	A Boolean value that indicates whether a user has chosen to	Upon termination of the browser session

8.3. Deactivation of Cookies

The user can disable the use of cookies by customizing his settings in his browser software (e.g. in Internet Explorer, Chrome, Mozilla Firefox, Safari, etc.). However, this will adversely affect the full functionality of the website.

9. Changes to the Privacy Policy

If the Company decides to change its Privacy Policy, these changes will be published directly through NovoLearn. If the changes are material to you, particularly with respect to your right to privacy and the protection of your Data, you will be required to reaffirm them.

This Privacy Policy was last amended in August 2026.