

Privacy Policy

1. Introduction

Welcome to Etudier Ltd ("Company", "we", "our", "us"). We are committed to protecting and respecting your privacy. This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you visit our website [estudi.art](https://www.estudi.art) ("website", "our website", "this website"), use our AI language learning platform, or engage with our services.

2. Information We Collect

We may collect and process the following data about you:

2.1 Personal Data

- **Identity Data:** Name, username or similar identifier, title, date of birth, and gender.
- **Contact Data:** Billing address, delivery address, email address, and telephone numbers.
- **Financial Data:** Bank account and payment card details.
- **Transaction Data:** Details about payments to and from you and other details of services you have purchased from us.
- **Technical Data:** Internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Profile Data:** Your username and password, purchases or orders made by you, your interests, preferences, feedback, and survey responses.
- **Usage Data:** Information about how you use our website, products, and services.
- **Marketing and Communications Data:** Your preferences in receiving marketing from us and your communication preferences.

2.2 Special Categories of Personal Data

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data).

3. How We Collect Your Data

We use different methods to collect data from and about you including:

- **Direct Interactions:** You may give us your Identity, Contact, and Financial Data by filling in forms or by corresponding with us by post, phone, email, or otherwise.
- **Automated Technologies or Interactions:** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions, and patterns.
- **Third Parties or Publicly Available Sources:** We may receive personal data about you from various third parties and public sources.

4. How We Use Your Data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- To provide and manage your access to our Service.
- To manage payments, fees, and charges.
- To manage our relationship with you.
- To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.
- To use data analytics to improve our website, products/services, marketing, customer relationships, and experiences.
- To make suggestions and recommendations to you about goods or services that may be of interest to you.

5. Legal Basis for Processing

We will process your personal data under the following lawful bases:

- **Performance of a contract:** Where we need to perform the contract we are about to enter into or have entered into with you.
- **Legitimate interests:** Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- **Consent:** Where you have given us your consent to process your personal data.
- **Compliance with a legal obligation:** Where we need to comply with a legal or regulatory obligation.

6. Disclosure of Your Data

We may share your personal data with:

- **Service providers:** who provide IT and system administration services.
- **Professional advisers:** including lawyers, bankers, auditors, and insurers.
- **HM Revenue & Customs, regulators, and other authorities:** who require reporting of processing activities in certain circumstances.
- **Third-Party Analytics Services:** to help us understand and improve the usage of our Platform.
- **Marketing Partners:** to deliver relevant advertising and promotional content.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

7. International Transfers

We may share your personal data within our group and with certain third parties who are based outside the European Economic Area (EEA). Whenever we transfer your personal data

out of the EEA, we ensure a similar degree of protection is afforded to it by implementing at least one of the following safeguards:

- **We will only transfer your personal data to countries that have been deemed adequate by the European Commission, which means they provide an equivalent level of protection to your personal data.**
- **Where the transfer is to a third party in the US, we ensure that appropriate safeguards are in place such as the use of standard contractual clauses approved by the European Commission.**

8. Data Security

We have implemented appropriate security measures to prevent your personal data from being accidentally lost, used, accessed, altered, or disclosed in an unauthorized way. We also limit access to your personal data to those employees, agents, contractors, and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

9. Data Retention

We will only retain your personal data for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure, and the purposes for which we process your personal data and whether we can achieve those purposes through other means.

10. Your Rights

Under the GDPR, you have rights regarding your personal data. These rights include:

- **The right to access:** You can request a copy of the personal data we hold about you.
- **The right to rectification:** If your personal data is inaccurate or incomplete, you can request that we correct or complete it.
- **The right to erasure:** You can request that we delete or remove your personal data in certain circumstances.
- **The right to restrict processing:** You can ask us to suspend the processing of your personal data in certain situations.
- **The right to data portability:** You can request the transfer of your personal data to you or to a third party in a structured, commonly used, and machine-readable format.
- **The right to object:** You can object to the processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- **Rights related to automated decision-making:** You can request not to be subject to automated decisions, including profiling, if it significantly affects you.
- **Right to Withdraw Consent:** You may withdraw your consent when respective processing is based on your consent. Please note that the withdrawal of consent does not affect the lawfulness of processing before consent withdrawal.

To exercise any of these rights, please contact us using the details provided below.

11. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices or for other operational, legal, or regulatory reasons. We will notify you of any significant changes by posting the new Privacy Policy on our website. We encourage you to review this Privacy Policy periodically to stay informed about how we are protecting your data.

12. Contact Us

If you have any questions about this Privacy Policy or our privacy practices, please contact us at:

Etudier Ltd

Copper House, 88 Snakes Lane East, Woodford Green, England, IG8 7HX

support@estudi.art