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FRENCHSOEASY - PRIVACY POLICY

FrenchSoEasy Platform is committed to protecting your personal data. We tried to write down this Privacy Policy in the most clear and plain language possible. Likewise, we tried to provide you with our privacy commitments in a transparent and easily accessible way. That said, we hope you will get all needed details to be assured your personal data is safe with u

Before you give us your consent on the processing of your personal data or provide us with your personal data within any form on our website, we kindly ask you to read carefully this Privacy Policy, so we can be sure that you completely understand the conditions under which we would cooperate.

This Privacy Policy applies to your use of the Services of FrenchSoEasy Platform, as defined in our Terms of Service. FrenchSoEasy offers you options concerning data we process, use and share as described in this Privacy Policy and Cookies Policy.

This Privacy Policy explains when, where, and why we process personal data about people who use FrenchSoEasy, how we use it, the conditions under which we may disclose it to others, your rights in respect of your personal data, as well as how we keep it secure. As regards the use of FrenchSoEasy Blog, this Policy is further specified through the FrenchSoEasy Blog Privacy Policy.

GENERAL

Anyone can access our Website without necessity to provide its personal data. Therefore, limited use of the Services is always possible without the provision of your personal data (for example, browse the Website, check how FrenchSoEasy works, look through the list of tutors, read the FrenchSoEasy Blog, review the variety of services etc.).

When you are a registered User FrenchSoEasy may collect from you and process Cookie identifiers and those data you specifically provide us with upon registration, including first name, last name, email, phone number, Skype ID or social network ID (if assigned through Facebook or Google+ or if accessing Google Calendar), time zone, interface language, IP address, and device type, as well, whereas in case of Telegram subscription, your Telegram ID may also be processed by FrenchSoEasy.

Specifically, if you are a tutor, we may also collect and process, besides the aforementioned information, the other data provided by you, including zip-code, gender, year of birth, city of living, and education experience.

Registered Users may additionally provide us with added profile pictures as well as chosen currency to perform actions pursuant to our Payment Policy.

You can find out more about the specific cases of data collection and the purposes of processing of such data in a separate section of this Privacy Policy.

We may change this Privacy Policy from time to time, so please check this page to ensure that you're happy with any changes. We will post those changes on this page and update the Privacy Policymodification date at the top of this page. The additional notifications on any amendments will be sent to your email.

Any questions regarding this Policy and our services should be sent to legal@FrenchSoEasy.com.

1. What is personal data and what is processing of personal data. Main definitions

Personal data is any information relating to you and that alone or in combination with other pieces of information gives the opportunity to a person that collects and processes such information to identify you as an individual.

Processing of the personal data means any operation with your personal data, whether or not by automated means, as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Data subject is any identified or identifiable natural person, whose personal data is processed by the controller responsible for the processing; means you as a user of FrenchSoEasy.

Consent of the data subject/user is any freely given, specific, informed and unambiguous indication of the data subject/user's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

2. FrenchSoEasy's lawful bases for processing

FrenchSoEasy will process your personal data only when we have lawful bases. Specifically, FrenchSoEasy processes your personal data if:

- processing is based on the consent you have given;
 - processing is necessary to provide our services to you according to our Terms of Service which constitute a contract between you and us as regards to information services of FrenchSoEasy;
 - processing is necessary for the purposes of the legitimate interests, including, for example, those prescribed by the data protection legislation, those necessary to protect your vital interests or vital interests of another natural person; or for the performance of a task carried out in the public interest or in the exercise of official authority vested in us. As regards this lawful basis, you have the right to object to such processing.
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In all cases, we will notify you about applied legal basis for processing and other relevant details, before we start processing of your personal data on the specific legal basis, unless we are not able to do so in accordance with our obligations under any applicable legislation.

3. Data We Collect: Scope

FrenchSoEasy collects from you only the following information and only for the stated below purposes:

(1) Account for students

FrenchSoEasy collects and processes personal data submitted by you upon registration and further editing of settings in your Account. For the registration purposes, you submit your login credentials (username and passwords), first name, last name and email. You may edit your Account with additional information at your sole discretion. Additional information may help you to get more from the Services, for instance, finding a necessary tutor. At the same time you are not required to provide additional information, not specifically necessary for the registration, it is your choice.

(2) Profile for tutors

FrenchSoEasy collects and processes personal data submitted by you upon registration and further editing of your Profile. For the registration purposes, you submit your login credentials (username and passwords), first name, last name and email. You may edit your Profile with additional information at your sole discretion. Additional information may help you to get more

from the Services, for instance, finding students. At the same time you are not strictly required to provide additional information, not specifically necessary for the registration. Therefore, it is your choice whether to include additional data to your profile, or not, such as zip code, country, language skills, education and work experience.

Some personal data, such as users' names, and location that is listed in your user profiles or derived from IP Addresses may be publicly visible to other users on the Services or to the web. We may implement a feature that permits you to choose what information is made public by changing your privacy setting in "Edit My Profile" within the Service.

(3) Posting of Information

We process personal data freely submitted to you on FrenchSoEasy. This may be survey you fill in on FrenchSoEasy or feedback you provide us with. Irrespective of whether you are a registered user or not, this shall also cover situations when you post an article(s) or comment(s) on the FrenchSoEasy Blog, as specified in the FrenchSoEasy Blog Privacy Policy.

FrenchSoEasy may also process information provided by you (including content and messages) that you post on/through our Website, including personally identifiable information. By so doing, you acknowledge that any information you share through the Services will be available to FrenchSoEasy and to other users of the Services (students/tutors). You also acknowledge that parts of your content cannot be deleted from the Service as it may be connected to the Lessons created by you and used by other users (students/tutors).

From our turn and unless you opt-out, we retain this information as necessary to resolve disputes, provide customer support and troubleshoot problems as permitted by law. We reserve the right to terminate the accounts of visitors who use these services in a manner inconsistent with the Terms of Service.

(4) Service Use, Cookies and other Similar Technologies

When you use our Services, we monitor and analyze web traffic and keep track of your behavior while using our Services. We may receive the information about your IP address, proxy server and operating system, the web browser or your mobile carrier and location based on phone settings.

Please, specifically refer to our Cookies Policy for further details as to our use of cookies and similar technologies.

(5) Billing information

Details of transactions you carry out through our Website (as ID, date and time of transaction).

(6) Enterprise

When you wish to share your contact details for more information regarding FrenchSoEasy Enterprise one-on- one online language training for international teams, as name, email, company name and phone number.

(7) Sensitive data Unless you expressly agree, FrenchSoEasy does not process your sensitive data.

4. Data We Collect: Purposes

We may process your personal data you provided us voluntarily with for the purposes defined below. From our perspective, we process your personal data to personalize the use of FrenchSoEasy to the fullest extent possible and to provide you with the high-quality Services under the Terms of Service.

(1) Provision of Services

Primarily, we process your personal data to authorize access to our Services and to fulfill our obligations under the Terms of Service for Services provision. Specifically, we use your personal data upon registration to help others (be it a tutor or a student) to find your account or profile.

In order for you to use the Services you will need to provide payment (e.g. credit card details) and billing information pursuant to our Payment Policy through our partners - service providers (payments), which process your personal data encrypted and securely.

(2) Payment Services

We use third party payment services to bill you through an online account payment in lieu of directly processing your credit/debit card information. Your paid balance for one or more lessons is safe in your account as we use an integrated iframe for checkouts from our partners-payment providers (Braintree, Stripe, PayPal) and tutors get payment for each confirmed lesson. Correspondingly all transactions are secured as our partners-payment providers use SSL encryption protection. All payment information is stored encrypted and securely by Braintree, a PayPal service. We do not store your payment information on our servers.

(3) "Tell-A-Friend"

For referral service purposes named "Tell-A-Friend", you may provide your friend's name and email address. Pursuant to that, we will automatically send your friend a one-time email inviting him or her to visit the Service. FrenchSoEasy stores this information for the sole purpose of sending this one-time email and tracking the success of our referral program.

Of course, your friend may contact us at support@FrenchSoEasy.com to request that we remove this information from our database.

(4) Communications

We may also contact you via email and other ways, including through publicly available notices, for the Services-related purposes (welcoming letter, security and legal notices, announcements, FrenchSoEasy updates, reminders, suggestions etc.). We could also use your data to enable you to communicate with other users through FrenchSoEasy.

We may contact you by email and other ways, including through publicly available notices, for service-related purposes (welcome letter, security and legal notices, announcements, FrenchSoEasy updates, reminders, suggestions etc.). We may also use your data to enable you to communicate with other users through FrenchSoEasy.

Your contact data (including email, phone number, Skype name etc.) may also be used for gathering feedback. We may contact you to participate in research to improve the user experience of our product. The research will be used for internal purposes only, including:

- Feature development and product updates; -Marketing activities;
- Customer Support updates;
- Other service updates for improving your experience.

Any other personal data provided in your feedback will not be collected or processed.

Your feedback will not be video recorded, audio recorded, or webcast by the Interviewer. Your voice and/or image will not be recorded either.

Having received the communications from us, you are always able to opt-out to such communications in each message, excluding legal notices, or change of user settings on FrenchSoEasy.

(5) Marketing

We may process your first name, last name and email on our mailing list or for the newsletter and send you messages with some commercial or promotional information about our Services. But don't worry, you may always opt-out from our marketing messages, using the mechanisms described under the respective link in each message, and through the user settings available on FrenchSoEasy.

Also, please pay attention that we may use the information provided by you as a feedback. The latter, under Section 12 of the Terms of Service, may be used by FrenchSoEasy without any additional compensation to you.

(6) Advertising

We may process your first name, last name and email in order to occasionally send you information on products, services, special deals, and promotions. You can sign up for these emails from us on our registration page. Out of respect for your privacy, we present the option not to receive these types of communications.

(7) Analytics and Development

In order to find the points of interest on our Services and for the purposes of analytics, we monitor and analyze web traffic and keep track of your behavior within our Services. This

enables us to provide services that are relevant to you and boost the quality of our Services. The data concerned within this activity are Cookies and Usage data, such as the parts of our Services you visit, the date and duration of your visit, and type of the device you used during your visit. All your data stated in this paragraph is collected and further processed in a manner that does not allow your identification. For these purposes, we use Google Analytics for Firebase, Hotjar Heat Maps & Recordings, Amplitude Analytics, Branch.io, Braze, Pushwoosh and Intercom, the use of which ensures compliance with our privacy commitments.

We may also carry out polls and surveys through FrenchSoEasy using external GDPR-compliant services. You are not obliged to respond to them and you may opt-out of such polls and surveys through user settings. In order to inform, optimize and serve you relevant advertising based on your past use of our Services, we may process your Usage Data and Cookies. Please, follow our Cookies Policy for additional information.

(8) Support

In case of any disputes on FrenchSoEasy and other Services-connected issues, we may use data (including communications) to resolve such matters and/or respond to any complaints.

(9) Changes

If FrenchSoEasy decides to change the purposes of processing specified above, we will inform you on such changes prior to the use of your personal data within the newly set purposes. The notification on such changes will be sent to your email and you will have to provide your consent for the amended purposes unless additional purpose of processing is compatible with those listed above.

In case you do not want to provide us the requested personal data for the purposes specified above, you may not have access to certain functions of the Services.

5. How We Share personal data?

In order to provide high-quality services, FrenchSoEasy hires people, enters into the agreements with independent contractors as well as cooperates with other services providers, companies and organizations strictly under data processing agreement (DPA). For those reasons, some of your personal data can be passed to the persons mentioned. FrenchSoEasy uses only secure places of storage, such as provided by AWS (Amazon, the USA) with servers located in Ireland and the United States, and other services and applications listed below.

As we mentioned above, we also use some services to collect, manage, analyze or otherwise process your data:

(1) Hotjar Heat Maps & Recordings (Hotjar Ltd.)

Hotjar is a session recording and heat mapping service provided by Hotjar Ltd. Hotjar process your data in Malta.

(2) Branch.io

The service specifically enables us to deliver to you high-quality user experience with a help of sufficient analytics. Branch.io stores the data in the United States.

(3) Google Analytics for Firebase

The resource serves as an additional measurement solution to carry out essential analytical work within our Services.

(4) Amplitude Analytics

We use supplementary analytical software through Amplitude Analytics in order to understand how you navigate through our Services.

(5) Intercom

We rely on Intercom for further marketing advances on FrenchSoEasy.

(6) Sendwithus and Sendgrid

We use these cloud-based solutions as the tools to manage and optimize the transactional emails.

(7) AlphaSMS

This SMS-provider helps us in the field of mobile marketing and non-voice informing as to our Services.

(8) Braintree, Payoneer, PayPal, Stripe

These are payment providers and services enabling your transfer and receipt of funds as payment for services provided via our Services.

These well-known service providers will help us to ensure that your data is secure within FrenchSoEasy. FrenchSoEasy has contractors and subsidiaries in other countries, including those outside the European Economic Area, who may have access to your personal data. At the same time, in all cases we pass your personal data to other persons we ensure that your

personal data is being protected and used only within the purposes specified in this Privacy Policy. This is achieved by using only certified services and products, signing data processing agreements for protection of personal data with contractors and partners (including the Standard Data Protection Clauses Adopted by the European Commission and compliant with the EU data protection laws), as well as taking technical measures to ensure the information is protected when stored, used and while being processed and transferred.

(9) Pushwoosh

We use this service to send push notifications to your mobile or desktop. You may always unsubscribe.

(10) Braze

We use this service to send emails and push notifications. Braze stores data about your activity on FrenchSoEasy.

By ticking the respective box when providing us with your personal data you agree to such transfer and processing within the purposes set in this Privacy Policy.

6. How long will the personal data be processed and stored by FrenchSoEasy?

Your personal data will be stored by FrenchSoEasy no longer than is necessary for the purposes for which the personal data is processed.

Generally, FrenchSoEasy retains your personal data as long as your account is active. In case your account expires or you decide to delete your account FrenchSoEasy retains your personal data not longer than 90 days after the account is expired.

However, in case of conflict situations in progress FrenchSoEasy may store personal data for 180 days period or more if the processing is necessary for the establishment, exercise or defence of legal claims and for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject in case of an expired account or in case data subject requested to delete his personal data. Upon the expiry of this period or earlier, if a conflict situation is settled, all personal data gets deleted.

In case your last activity on FrenchSoEasy, as of the last payment date, was more than 180 (one hundred eighty) days ago, your account will be considered expired and gets deleted. Along with your account or profile all personal data processed by FrenchSoEasy will be erased.

As you are entitled to delete your account or profile after such request it will be permanently removed within 30 days or earlier from our active systems, servers and back-ups. By deleting your account or profile all your personal data will be removed as well within 90 days.

As to Personal Data collected when you registered on our mailing list or for the newsletter, will be stored as long as you are interested in receiving our emails. We consider that you're

interested in this until you unsubscribe from the mailing list or from the newsletter by clicking the respective link contained in each of our emails.

After the expiration of retention period, FrenchSoEasy shall terminate the processing of your personal data, unless otherwise is set by the relevant legislation.

7. Your rights as data subject regarding your personal data FrenchSoEasy processes:

a) right of confirmation - to obtain from FrenchSoEasy the confirmation as to whether or not personal data concerning you is being processed;

b) right of access to your personal data processed by FrenchSoEasy;

c) right to rectification – ask FrenchSoEasy to have incomplete personal data requiring corrections completed;

d) right to erasure (right to be forgotten) – request FrenchSoEasy to erase personal data. In most cases FrenchSoEasy will erase it unless otherwise required by legislation;

e) right of restriction of processing. For example, you could contest the accuracy of your personal data or in case FrenchSoEasy is not interested in processing of your personal data any longer, but you want FrenchSoEasy to do this for different reasons, for example, to bring some claim for somebody and, instead of the erasure of information, its processing will be just restricted.

f) right to data portability - to have your personal data transmitted directly from one controller to another, where technically feasible and when doing so does not adversely affect the rights and freedoms of others;

g) right to object to processing of your personal data by FrenchSoEasy when the processing is related to the performance of our task carried in the public interest or in the exercise of official authority vested in us. The other case is if we process your data for the purposes of the legitimate interests pursued by us or by a third party and you believe that such interests are overridden by your interests or fundamental rights and freedoms. If you make a request with objection to processing, we will no longer process the personal data unless we are able to demonstrate compelling legitimate grounds for the processing;

h) Automated individual decision-making, including profiling. Each data subject shall have the right granted by the European legislator not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her, or similarly significantly affects him or her, as long as the decision (1) is not necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) is not authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, or (3) is not based on the data subject's explicit consent.

i) Right to withdraw consent at any time by contacting us. After we at FrenchSoEasy receive such withdrawal request from you, we will process it in a timely manner and we will no longer process your personal data, unless otherwise is set by law.

If one of the aforementioned reasons applies, please contact us, as instructed at the end of this Privacy Policy. We shall promptly ensure that the request is complied with immediately. These requests are free of charge.

Please, note that when the processing of your personal data is carried for direct marketing purposes, you have the right to object at any time to such processing without providing any justification and we will no longer process your data with such direct marketing purposes.

8. Other Privacy Commitments

(1) Cross-border transfers

We process your personal data both within the United States and outside the United States. Although countries where we process data may have different laws, we take measures to ensure high privacy compliance (namely, as provided in Section 5 of this Privacy Policy).

(2) Time for reply and reaction

FrenchSoEasy will provide information on action taken on your request related to your rights specified above within one month of receipt of the request for the longest. That period may be extended by two further months if FrenchSoEasy is overwhelmed by the number of requests or the request at issue is complicated and requires a lot of action. FrenchSoEasy will inform you of any such extension within one month of receipt of the request, together with the reasons of such delay.

(3) Security

FrenchSoEasy takes technical and organizational measures to ensure the information is processed in a manner that ensures appropriate security of information, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage. For example, FrenchSoEasy uses verified contractors that might have access to the data with which the relevant data processing agreements are signed.

(4) Children's privacy

The privacy of children is one of our concerns. FrenchSoEasy Services are not intended for use by children under the age of 18 without the express permission of their parent or legal guardian. If you are under the age of 18 you will need to get your parent's/legal guardian's permission before submitting any personal data to FrenchSoEasy. We may process the personal data of children under the age of 18, provided that data has been consensually provided by parents/legal guardians for the express purpose of using FrenchSoEasy Services.

FrenchSoEasy is acting in compliance with COPPA. It requires us to inform parents and legal guardians about how we collect, use, and disclose personal information from children under the age of 13. We do not knowingly collect information from children and minors. We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce our

Privacy Policy by instructing their children to never provide information on our Website without their permission.

(5) Breach notifications

If any personal data of yours would be under the breach, we would inform you and the respective data protection agencies as to the accidents without undue delay, if there are high risks of violation of your rights as data subject. We would also do our best to minimize any such risks.

(6) “DoNotTrack” requests

FrenchSoEasy does not share personal data with third parties for their direct marketing purposes. Also, our Services do not support “Do Not Track” requests.

(7) California Privacy Rights (CCPA)

In case you are a resident of California, the California Civil Code Section 1798.83 permits you to request information regarding the disclosure of your personal data by FrenchSoEasy, Inc. or its subsidiaries to a third party for the third party's direct marketing purposes. This right granted to California residents applies only to their activities within the State of California.

To make such a request, please send an email to legal@FrenchSoEasy.com.

9. Legal Matters

FrenchSoEasy considers your use of its Service to be private. However, we may disclose your personal data

stored in our databases, in order to:

(1) comply with the law or legal process served on us;

(2) enforce and investigate potential violations of this Privacy Policy; including use of this Service to participate in, or facilitate activities that violate the law;

(3) investigate potentially fraudulent activities; or

(4) protect the rights, property, or safety of FrenchSoEasy, its employees, its customers or the public.

10. Governing law

This Privacy Policy is governed by and construed with the laws of the State of Delaware, USA, and, when applicable, Regulation 2016/679 on the protection of natural persons with regard to

the processing of Personal Data and on the free movement of such data, and repealing Directive 95/46/EC (“GDPR”), effective as of 25 May 2018.

We hope this Privacy Policy helped you to understand how your personal data will be dealt here at FrenchSoEasy. We will take care of your personal data, so you can use our Services and not to be concerned over your privacy. Should you have anything to tell us, e-mail us at support@FrenchSoEasy.com. We will be happy to receive any information or comment from you to make our platform better for our users.

support@FrenchSoEasy.com.

Data Controller: FrenchSoEasy Inc., address: 251 Little Falls Drive, city Wilmington, County of New Castle, Delaware 19808, email: legal@FrenchSoEasy.com, tel.: +1 302 261 5712.

FrenchSoEasy Europe Services, SL is the designated representative of FrenchSoEasy Inc. in EU in accordance with the Regulation No. 2016/679 on the protection of natural persons with regard to the processing of personal data (the “GDPR”), residing at NIF # B67290056 with its registered seat at calle Muntaner No. 239, Barcelona 08021. Email: legal@FrenchSoEasy.com, tel.: (+34) 932 173 444.

Your FrenchSoEasy Team.