

Langfit Privacy Policy

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Welcome to the Privacy Policy page. After reading it, you will get acquainted with the following questions:

- Who is the personal data controller that processes your data?
- What information does Langfit gather?
- Why do we gather data?
- Does Langfit disclose the information it collects?
- What rights do Users have?
- How does Langfit protect the data provided by Users?
- How can the Privacy Policy change?
- To what extent does this Privacy Policy apply?

LANGFIT LLC is a company registered under the law of Ukraine, which operates the **Langfit** Platform (hereinafter "Langfit", "Platform", "we"). According to the current legislation, we are the controller of Personal Data, i.e. the person responsible for the security and proper processing of Personal Data that we have received from Users (hereinafter "Participants", "you").

By Users we mean:

- Platform **Guests** who view the Platform but do not create an Account.
- Platform **Members** who have created an Account on the Platform and use the Langfit Platform as intended.

The terms used in this Privacy Policy are interpreted in accordance with the Langfit Agreement, which can be found at [this link](#).

By providing us with their Personal Data (Personal Data is personally identifiable information) using electronic forms posted on the Site or in the Mobile Application, Users expressly consent to the processing of such data in accordance with the terms of the Privacy Policy and for the purposes set out in this Policy.

Users should read this Privacy Policy before creating an Account on the Langfit Platform.

As soon as the registration process is completed, all Members gain access to their Account, which they can fill out and/or edit as they see fit and with which they can create, conduct, view, or attend online lessons.

The data collected by Langfit is used only to achieve the purposes set out later in this Privacy Policy.

What principles do we follow?

The Langfit platform adheres to all appropriate principles for the protection of your Personal Data:

- **Target Restriction Principle.** We process Personal Data honestly and transparently, solely to achieve certain clear and legitimate purposes, and we do not process it in a way that does not meet such data processing purposes.
- **The principle of data minimization.** We collect personal data only to the extent necessary to achieve the goals. We do not store Personal Data if you no longer need it.
- **Restricted Use Principle.** We use Personal Data for any other purpose only with the consent of the User or if permitted by the competent authority.
- **The principle of data quality.** We always keep Personal Data up-to-date and intact to achieve the ultimate goal of data processing more effectively.
- **Principle of security and integrity.** We process personal data in a way that ensures the proper security of Personal Data, including its protection against unauthorized or unlawful processing and accidental loss, destruction or damage through appropriate technical and organizational measures.
- **Principle of individual participation.** Users will be notified of the collection of their data. They should be given access to their Personal Data and have the right to request the correction of inaccurate data.

1. What information does Langfit gather?

The Langfit platform (which includes the Site and the Mobile Application) is used by Members and Guests. The information we receive from Members and Guests is collected in accordance with the following provisions.

1.1. Langfit collects information directly from Members, as well as information that is provided indirectly through the use of the Langfit Platform.

1.2. **Guests**

1.2.1. We may collect, record and analyze information about visitors to our Site. If you access langfit.net for information only, that is, when you do not create an Account or provide us with any information, we will only collect Personal Data that has been transmitted by your browser. If you wish to view our Site, we collect the following data (hereinafter referred to as "Usage Data") necessary for technical purposes in order to be able to demonstrate our Site to you and to provide sufficient stability and security of access:

- IP address.
- Date and time of the request.
- Time zone difference relative to Greenwich Mean Time (GMT).
- The amount of data transmitted in each case.
- Browser.
- OS and OS interface.

- Browser language and version.
 - 1.2.2. We use this information collectively to evaluate the popularity of web pages on our Website.
 - 1.2.3. The basis for processing the Usage Data is our legitimate interest. This is necessary for the efficient and effective management and conduct of our business, the provision of quality services, including site support, development and improvement of the Platform, and to determine who may be interested in them.
 - 1.2.4. We collect the name, email address, and text of the request when the Guest wants to contact us and leave a request. We use the collected Personal Data only to contact you, as you are waiting for our response to your request, and we may also record your request and our response to improve the organization and operation of our support service.
 - 1.2.5. If you do not want us to collect your Personal Data, do not use our contact form.
 - 1.2.6. The basis for the processing of personal data of our Guests is their consent to the processing of their personal data for communication purposes. We use such Personal Data in ways that you reasonably expect and that have the least impact on privacy. You can revoke your consent at any time by sending us an email to admin@langfit.net with your request to delete Personal Data, and your Personal Data will be deleted within seventy-two (72) hours.
 - 1.2.7. Guests can control the use of cookies at the level of a separate browser. If you reject cookies, you may still use our Site, but your ability to use certain features or parts of our Site may be limited.

1.3. **Members**

- 1.3.1. When you create an Account on the Platform, you provide us with information that contains Personal Data. This information is used by us to identify Members and provide you with services, billing, mailing, notification and support.
- 1.3.2. We collect data (hereinafter referred to as "Usage Data") obtained during the use of the Platform, the Mobile Application, which are created each time the Members interact with the Platform, necessary for technical purposes and to ensure stability and security of access:
 - IP address.
 - Date and time of the request.
 - Time zone difference relative to Greenwich Mean Time (GMT).
 - The amount of data transmitted in each case.
 - Browser.
 - OS and OS interface.
 - Browser language and version.

- 1.3.3. When registering on the Langfit Platform, Members must provide the following information to create or edit their Account: name and email address.
- 1.3.4. Participants can view and edit their Personal Data whenever they wish.
- 1.3.5. Participants may provide any additional information for other purposes. For example, a profile photo or a link to social networks, download content and more.
- 1.3.6. When contacting our support service, Langfit has access to the information provided by Members to resolve any questions or complaints regarding the use of the Platform by email admin@langfit.net.
- 1.3.7. Langfit needs to process this data to fulfill the established contractual obligations. If the Member does not provide data, the requested services may not be available.
- 1.3.8. Members can control the use of cookies at the level of a separate browser. If you reject cookies, you may still use the Platform, but your ability to use certain features or parts of the Platform may be limited.

2. Why do we collect data?

- 2.1. Langfit uses the data received from Users in order to give them access and the ability to interact with the Langfit Platform and provide access to all services of the Platform.

3. Does Langfit disclose the information it collects?

- 3.1. The personal data collected by Langfit will only be used to achieve the purpose set out in the Privacy Policy.
- 3.2. In order to perform the services, as well as for its own legitimate interests, Langfit discloses certain Personal Data of Users:
 - 3.2.1. Langfit guarantees that all commercial partners, technicians, suppliers or independent third parties are contractually obliged to process the information provided to them in accordance with Langfit's instructions, this Privacy Policy and applicable data protection laws.
 - 3.2.2. By choosing service providers, Langfit can transfer User data outside the European Economic Area. In such cases, Langfit must ensure that suppliers comply with the minimum security standards set by the European Commission and that they always process the data in accordance with Langfit's instructions before sending the data. Langfit may have a contractual relationship with them, according to which service providers agree to follow Langfit's

instructions and take all necessary security measures to protect User data.

- 3.3. Members' data are not disclosed to any third party, except in the following cases:
 - 3.3.1. this is necessary for Langfit to cooperate with third parties to provide the requested services;
 - 3.3.2. Langfit has the clear and unambiguous consent of the User;
 - 3.3.3. the competent authority requires the disclosure of information in accordance with its responsibilities (to conduct an investigation, to prevent wrongdoing); or
 - 3.3.4. in accordance with the law.
- 3.4. In no case may the disclosure of data be carried out for the purpose of exchanging, selling or leasing the personal data of the Members for commercial purposes or contrary to the obligations set forth in this Privacy Policy.

4. Processing of special Personal Data

- 4.1. We do not collect or process sensitive Personal Data, such as data on religion, race or ethnicity, trade union participation, political views, sexual orientation, genetic and biometric data, health data, crime and criminal liability.

5. Which suppliers do we use?

- 5.1. We work with third-party service providers who provide us with website development services, hosting our Site, maintenance, e-mailing, marketing, technical support, information technology and cybersecurity services, customer service and other services. These contractors may access or process Personal Data on our behalf as part of our services. We limit the information provided to our service providers to information that is reasonably necessary to perform their functions.
- 5.2. We use [Google Analytics](#) to monitor and analyze web traffic. Google Analytics is a web analytics service provided by Google LLC. (hereinafter referred to as "Google"). Google uses the collected Data to track and study the use of our Site, to prepare reports on its operation and to share them with other Google services. Google may use the collected Personal Data to contextualize and personalize advertising for its own ad network. Personal Data Collected: Cookies and Usage Data. Place of data processing: USA - [Privacy Policy](#) - [Opt Out](#). Member of the Privacy Shield program.
- 5.3. We use Google [Tag Manager](#) to monitor and analyze web traffic. Google Tag Manager is a tag management system provided by Google. Google uses the data collected to track and study the use of our Site, to prepare reports on its activities and to share this data with other Google services. Google may use the personal information collected to contextualize and personalize advertising for its own ad network. Collected personal data:

cookies and usage data. Place of data processing: USA - [Privacy Policy](#) - [Opt Out](#). Member of the Privacy Shield program.

- 5.4. We use [Facebook Pixel](#) to monitor and analyze web traffic. Facebook pixel is a web analytics service provided by Facebook Ireland Ltd ("Facebook"). Facebook uses the collected data to track and research the use of our Site, to prepare reports on its operation and pass them on to other Facebook services. Facebook may use the collected Personal Data to contextualize and personalize the advertising of its own advertising network. Collected personal data: cookies and usage data. Data location: Republic of Ireland - [Privacy Policy](#) - [Opt Out](#). Member of the Privacy Shield program.
- 5.5. We use [Mixpanel](#) to analyze and analyze User behavior. Place of data: USA - [Privacy Policy](#).
- 5.6. We use the [AWS](#) provided by Amazon Web Services to securely host our Website on the server. Place of processing: Luxembourg - [Privacy Policy](#). The infrastructure is protected by a multi-level approach to protection.
- 5.7. We may need to transfer Personal Data to our providers who provide these services. If your Personal Data is transferred outside the European Economic Area, we require such persons to take appropriate security measures. For more information on cross-border transfers of information to our service providers outside the European Economic Area, please contact us at admin@langfit.net.

6. How long do we keep Personal Data?

- 6.1. To determine the appropriate retention period for each type of Personal Data, we consider the extent, nature and sensitivity of the Personal Data, the potential risk of harm from unauthorized use or disclosure of your Personal Data, the purpose for which we process your Personal Data, and whether we can achieve these goals by other means, and the relevant legal requirements.
- 6.2. If the Member withdraws his consent to the processing or requests the deletion of his Personal Data, the data is blocked and their processing is terminated.

7. What rights do Users have?

- 7.1. If permitted by law, you have the right to receive a copy of your Personal Data that we store. Before responding to such a request, we may require you to provide:
 - 7.1.1. confirmation of your identity and
 - 7.1.2. other details so that we can better respond to your request.

We will endeavor to respond to you within 30 (thirty) calendar days as required by law.

- 7.2. You have the right to protect your Personal Data from unlawful processing and accidental loss, destruction, damage due to intentional concealment,

failure to provide or untimely provision of Personal Data, and the right to protection against information that is inaccurate or discredits your honor, dignity or business reputation. You also have the right to use the remedies available in the event of a breach of personal data protection law under applicable law. The list of your rights specified in this Privacy Policy regarding Personal Data is not exhaustive and includes all rights provided by the Law of Ukraine "On Personal Data Protection" and other applicable legislation defined in paragraph 9. To submit a request, contact us at admin@langfit.net.

8. How do we protect User data?

- 8.1. Due to the nature of the Personal Data processed and the circumstances of the processing, Langfit takes the necessary steps recommended by the European Commission and the competent authority to maintain an appropriate level of security in order to avoid (as far as possible and always according to technology) changes, loss, unauthorized access to or processing of data. As noted above, Personal Information we receive from you will not be disclosed to third parties without the prior permission of the data subject.

9. Compliance with the Law

- 9.1. Our Privacy Policy is in accordance with the laws of each country or jurisdiction in which we seek to operate. If you believe that this Policy does not comply with the law of your jurisdiction, we would like to receive feedback from you. However, ultimately, it is your choice as to whether you want to use our Platform.
- 9.2. For users located in Ukraine, all processing of Personal Data is performed in accordance with the provisions and rules of [the Law of Ukraine "On Personal Data Protection"](#).
- 9.3. For users who are in the European Economic Area (EEA), Processing and transfer of Personal Data is carried out in accordance with the requirements set out in the provisions and rules of [Regulation \(EU\) 2016/679 of the European Parliament and of the Council of 27 April 2016 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 \(General Data Protection Regulation\) \(GDPR\)](#)
- 9.4. For users located in California, all processing of Personal Data is performed in accordance with the provisions and rules arising from the [California Consumer Privacy Act, Cal. Civ. Code § 1798.100 et seq. \(CCPA\)](#)
- 9.5. For users located in Brazil, all processing of Personal Data is performed in accordance with the provisions and rules arising from the [Brazilian Data Protection Act. \(LGPD\)](#)

10. How can the Privacy Policy change?

- 10.1. Due to the fact that Langfit is constantly evolving, this Privacy Policy and the Agreement are subject to change. Langfit will never change its policy if this may reduce the effectiveness of the protection of users' personal data.

11. To what extent does this Privacy Policy apply?

- 11.1. This Privacy Policy applies only to our Site and Mobile Application.
- 11.2. Please be careful when visiting the Platform. Our Website and Mobile Application may contain links to other websites. Once you go to another website, this Policy will no longer apply. We are not responsible for the content or privacy policies of other websites, the processing and collection of your Personal Data by them.
- 11.3. If you have any questions about the activities of our Site or Mobile Application or about your interaction with the Platform, questions regarding the collection and processing of your Personal Data, please contact us - admin@langfit.net.

Contact information

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