

## PRIVACY POLICY

Issued on 01.01.2023

This privacy policy (hereinafter referred to as the "Privacy Policy") governs the privacy terms of our website (<https://animationclub.school/>), [online platform \(campus.animationclub.school\)](https://campus.animationclub.school/) and service, including (without limitation) all websites, mobile applications and other interactive properties through which the service is delivered (hereinafter collectively referred to as the "Website") that is owned by Individual Entrepreneur Edward Kurczewski.

The Privacy Policy is a legal statement, which explains how Edward Kurczewski - Individual Entrepreneur operating under the laws of the France with Main State Registration Number of Individual Entrepreneur 91262799900010 (hereinafter referred to as the "Animationclub.school" or "we" and through similar words such as "us," "our," as applicable), collects, retains, processes, and transfers the data about you (hereinafter referred to as the "personal information") , being the person or legal entity using our Website or who has registered with us through our Website or paying for any services of the Website (hereinafter referred to as "User", "you" or "your" as applicable), which we receive when you access or use the Website providing services (hereinafter referred to as the "Services").

### 1. What information will Animationclub.school collect about you?

#### 1.1. Animationclub.school will collect information

- from you or your parents or guardians if you are not of legal age (at least 18 or more according to the legislation of your country and domicile) via by filling in some prescribed forms on the Website, or by communicating with us, for example, via e-mail, phone, messengers or social networks. It includes the information you provide us with when you register to use the Website;
- from third parties, such as other sources, including third parties, which help us to update, expand, and analyze our records; prevent or detect fraud; process payments; or analyze how you use the Services.

#### 1.2. Animationclub.school will collect the following information about you or your parents or guardians:

- name, date of birth, gender, email address, telephone number, Skype and other contact details;
- proof of identification, such as passport, national ID card, any other information you provide us with, so that we could comply with our legal obligations and you could prove your eligibility for the use of the Services;
- information about your account on the Website: username, password, account settings and preferences;
- bank details and other financial information, if we ask for it (for example, to make a payment or a refund);
- photos, audio and video recordings of the classes, in which you participate; information about engagement into the classes; record of your consent to use camera and microphone during the classes; academic records including test and examination results;
- parent's or guardian consent; parent or guardian information (full name, date of birth, gender, phone number, Skype, email).

### 2. How will Animationclub.school use the information they collect about you.

#### 2.1. Animationclub.school will use your personal information for the purposes:

- 2.1.1. as it is necessary for our legitimate business interests; and/or
- 2.1.2. to enter into or perform a contract with you for using the Website; and/or
- 2.1.3. for our regular and ordinary course of business; and/or
- 2.1.4. as you have given consent, so that we process the information; and/or
- 2.1.5. to comply with our legal obligations;
- 2.1.6. to defend our legal rights and comply with court and/or administrative orders, should it be necessary.

#### 2.2. The description how we use your personal information, on which legal bases we rely, what are our legitimate interests (where appropriate):

- 2.2.1. to administrate finance;
- 2.2.2 to perform this contract, which includes:
  - to create and maintain your account;
  - to establish and maintain a responsible commercial relationship with you;
  - to fulfill our obligations under the User Agreement for Distance Training Services (hereinafter referred to as the "Terms of Use");
  - to enforce our terms, conditions and policies for the Services;
  - for identification of your account and verify your identity for preventing fraud, deception and other illegal activities and for confirming your eligibility to use the Services;
- 2.2.3. to monitor and report on your progress;
- 2.2.4. to provide you with news, information about changes to the Services, special offers and general information about other Services we offer, similar to those that you have already purchased or enquired about (Animationclub.school understands that you accept receiving this information should there be no request to cancel or to unsubscribe from receiving said information);
- 2.2.5. to comply with our legal obligations: to respond in the course of legal, regulatory, arbitration procedures; respond the requests for information, which are issued by public authorities or other authorized third parties.

### **3. When Animationclub.school disclose personal information to third parties?**

3.1. We only share the information:

- 3.1.1. to comply with laws;
- 3.1.2. to protect your rights;
- 3.1.3. to fulfill the business obligations (for example, if it is necessary to engage a third party to provide you with the Services);
- 3.1.4. if you granted us your consent to do so.

3.2. By accepting the Privacy Policy, you fully accept and agree that we may disclose the information about you only:

3.2.1. to comply with laws. We may disclose your information where we are legally required to do so to comply with the applicable law, governmental requests, a judicial proceeding, court order, or legal process. For example, we may disclose the information in response to a court order, a subpoena, a public authorities request to meet national security or law enforcement requirements. We may also disclose your information when we conduct or cooperate on investigations of fraud or other illegal activity, to prevent and detect fraud or any form of crime;

3.2.2. to allow third parties to render the services. We may share your data with business partners, service providers, contractors or agents performing the services for us or on our behalf and require access to such information to perform their obligations.

The examples of such third parties' services are payment processing, data analysis, email delivery, hosting, customer service, providing us with access to anti-fraud databases, screening. We may allow selected third parties to use tracking technology on the Website, which will enable them to collect the data about how you interact with the Website over time.

3.2.3. to transfer our business. We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company. We will provide you with the notice before your personal information is transferred and become subject to a different privacy policy.

### **4. With whom the Animationclub.school share your personal information?**

4.1. Competent authorities:

4.1.1. Upon request, and in the cases as described in clause 3.2.1. of Privacy Policy.

4.1.2. For the resolution of any conflict or dispute arising out the relationship between the users and the Animationclub.school.

4.2. Invoicing and billing providers:

4.2.1. We share and disclose your personal information - e-mail and your payment card details to the invoicing and billing providers:

Invoicing and Billing Provider	Where you can read its privacy policy (if any)
Boursorama banque, 4 Place de Budapest, CS 92459, 75436 PARIS CEDEX 09	<a href="https://www.boursorama.com/pub/bourso/reglementaire/politique_confidentiale_application_boursorama_android.pdf">https://www.boursorama.com/pub/bourso/reglementaire/politique_confidentiale_application_boursorama_android.pdf</a>

4.3. Storage providers:

Storage Providers	Where you can read its privacy policy (if any)
"LiteServer", B.V.Havinghastraat 32, 1817, DA Alkmaar, The Netherlands,	<a href="https://liteserver.nl/privacy-policy">https://liteserver.nl/privacy-policy</a>

4.4. Advertising platforms and applications:

The platforms, which we can use for advertising, allow us to optimize and serve advertising based on the use of the Website by tracking the usage data and by using cookies.

Advertising Platform	Who operates it	Purpose, for which we use it	Who and how stores and processes the data	Where can you read the privacy policy	How can you opt out
Google Ads	"Google": Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA	(1) to track your actions after you have been forwarded to our Website by clicking the Google advertisement; (2) to measure the effectiveness of Google	Google	<a href="https://policies.google.com/privacy">https://policies.google.com/privacy</a>	as described at <a href="https://policies.google.com/technologies/ads">https://policies.google.com/technologies/ads</a> in the section How you can control advertising cookies
Facebook Pixel; Facebook SDK	"Facebook": (1) Facebook Inc., 1601 Willow Road, Menlo Park, CA 94025, USA, - if you live outside the EU; or (2) Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour,	(1) to track your actions after you have been forwarded to our Website by clicking a Facebook advertisement; (2) to measure the effectiveness of Facebook ads for market research and statistical purposes, in	Facebook. The data is anonymous to us. The Facebook may connect this data with your Facebook account and use it for its own advertising purposes	<a href="https://www.facebook.com/about/privacy/">https://www.facebook.com/about/privacy/</a>	(1) for Facebook Pixel - through your Facebook account settings. You can do so both for Facebook Pixel and cookies; (2) for Facebook SDK - via your device settings

	Dublin 2, Ireland, - if you live in the EU	particular, to better understand and deliver ads and make them more relevant to you			
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#### 4.5. Marketing and analytics platforms:

We share and disclose your cookies for the web and mobile analytics purposes and to personalize the content on our Website: for example, to offer you not all our Services, but the ones, in which you might be interested.

Provider	Who operates it	Purpose, for which we use it	Where can you read the privacy policy	How can you opt out transmitting and processing the data generated by cookies by third party provider
Google Analytics	the Google	(1) to track the Website traffic and your behavior at the Website; (2) analyze, how you use the Website to improve its performance and manage advertising placements based on your interests and preferences	<a href="https://www.appsflyer.com/privacy-policy/">https://www.appsflyer.com/privacy-policy/</a>	<a href="https://www.appsflyer.com/optout">https://www.appsflyer.com/optout</a>
Yandex.Metrica	the Yandex	(1) to track the Website traffic and your behavior at the Website; (2) analyze, how you use the Website to improve its performance and manage advertising placements based on your interests and preferences	<a href="https://yandex.ru/legal/confidential/">https://yandex.ru/legal/confidential/</a>	by installing the add-on for your browser: <a href="https://yandex.com/support/metrica/general/opt-out.html">https://yandex.com/support/metrica/general/opt-out.html</a>

4.6. Support software providers we share and disclose your personal information, including first name, last name, phone number, email address, gender, location and social networks profiles to arrange customer support with:

Provider	Who operates it	Purpose, for which we use it	Where can you read the privacy policy (if any)
Getcourse	LLC "Systema Getkurs", 121205, Moscow, territory of the Skolkovo Innovation Center, Bolshoy Boulevard,	to communicate with our customers and with interested parties and answer their enquiries and requests	<a href="https://getcourse.ru/privacy_policy">https://getcourse.ru/privacy_policy</a>

## **5. Use of cookies.**

### 5.1. How we Use Cookies:

5.1.1. We use cookies to distinguish you from other users of our Website. This helps us to improve your experience and the Website itself: we store your preferences and analyze, how you use the Website.

5.1.2. A cookie is a small amount of data, which are stored in your web browser while you are browsing our Website. Our Website sends cookies to your browser; your device stores them. Using cookies will not give us access to any data on your device other than the data stored in the cookie. The cookies we collect do not store your personal information such as name or your address.

5.1.3. The cookies are stored permanently, not just for a session period. However, you can easily delete cookies in the web browser settings. You can learn more about cookies management in section 5.2.

5.1.4. By using the Website, you consent to the use of cookies as specified in the Privacy Policy.

### 5.2. Cookies management.

5.2.1. You can customize cookies, delete or refuse all the cookies at any time: just activate the setting of your browser, which allows you to refuse the cookies. Please, note that this can lead to impossibility to access certain functions of the Website.

5.2.2. For more information about the cookies management, including refusal from them, please refer to the settings of the browsers: Chrome, Edge, Firefox, Internet Explorer, Opera, Safari etc.

## **6. Initial login**

6.1. When you create an account for access to and use of the Website, you guarantee that the information you provide is accurate, current and complete at all times.

6.2. Your account and use of the Services is for your own personal, non-commercial use and not for the benefit of any third party. You are solely responsible for maintaining the confidentiality of your account and password, including but not limited to restriction of access to any third party the Website and any electronic means (i.e. computer, tablet, etc.) by which you access the Website. You accept all responsibility and liability for all activity that takes place on your account under your credentials. You must notify us immediately in the event you become aware of or suspect any breach of security or unauthorized use of your account.

6.3. You may not use any username that is or infers the name or identity of another person or entity that is not lawfully available to use, a name or trademark that is subject to any rights of another person or entity other than you, without appropriate authorization. You may not use a username that is offensive, vulgar or obscene. The Animationclub.school reserves the right to refuse service, terminate accounts, remove or edit content, in its sole discretion.

## **7. Retention of your information.**

7.1. We retention of your personal information for 84 months after you take the last Service at the Website.

7.2. After the retention period ends, we will delete your personal information or anonymize them, so that they can no longer be associated with you.

## **8. Security of personal information.**

8.1. We adopt appropriate physical, electronic, management and technical measures to protect the security of any personal information which we process. However, please also remember that we cannot ensure or warrant the security of your personal information, which you transmit to our Website. Although we will do our best to protect your personal information, transmission of the personal information to and from our Website is at your own risk. Please, access the Services only in a secure environment: for example, use firewalls, choose the provider, which encrypts the traffic, etc. After we receive the personal

information, we use strict procedures and security features to try to prevent unauthorized access. However, we will not be liable for any damages, which relate to unauthorized access to the personal information.

## 9. Minors' privacy

9.1. Our Services are for general audience and can be used by minors. Minors can access some publicly available parts of the Website and its content without providing us with personal information. However, the minors, who wish to get access to all the content and features of our Services, have to register with us. This requires collecting certain personal information from them. We may ask you to provide us with the information and documents confirming the age. If the you are a minor, we may require to provide us with the documents confirming your emancipation or legal consent of your parent or legal guardian.

## 10. Your data protection rights

10.1. Your data protection rights are:

Right	What you may do	How to execute the right
to access the Personal Data	(1) obtain a confirmation, if we process your personal information; (2) access your personal information and the information, how we use your personal information	please, contact us, as specified in section 14
to rectify inaccurate data	request that any incomplete or inaccurate personal information about you are corrected	please, contact us, as specified in section 14
to object to processing	object to processing your personal information if we process them based on the legitimate interests, use them for direct marketing or statistical purposes	please, contact us, as specified in section 14
to make us your data portable	request that in certain circumstances we provide you with a copy of your personal information in structured, commonly used and machinereadable format	please, contact us, as specified in section 14
to have your data erased	request that we delete your personal information in some circumstances - for example, we no longer need them, or you withdraw your consent, which was the basis for processing	please, contact us, as specified in section 14
to withdraw consent to processing the data	withdraw your consent for processing of your personal information	please, contact us, as specified in section 14
to restrict the processing	ask to restrict or stop collection, use, processing and/or disclosure of your personal information	please, contact us, as specified in section 14

to withdraw consent to electronic marketing	to opt out receiving our marketing emails	please, contact us, as specified in section 14
to file complaints	to complain to a data protection authority about our collection and use of your personal information	please, contact your local data protection authority

**11. Automated decision making.**

11.1 We don't apply automated decision making (making user profiles based on the personal information, etc.).

**12. Changes to Privacy Policy.**

12.1. We may modify the Privacy Policy at any time. If we make material changes to the Privacy Policy, we may notify you on our Website or via email. We will also change the version number and issue date at the beginning of the Privacy Policy. Any changes we make to the Privacy Policy are effective on or after the issue date. Each new version replaces any prior version of the Privacy Policy. We encourage you to review the Privacy Policy frequently to be informed of how we are protecting your information.

**13. What is our legal basis for processing your personal data?**

13.1. We have made every effort to ensure that this privacy policy complies with the EU's General Data Protection Regulation (GDPR), USA's California Consumer Privacy Act (CCPA) and the Federal Law of the Russian Federation "On the Protection of Personal Data". However, we require you to withdraw from this Privacy Policy and from the Services of the Website, if this Privacy Policy is contrary to the laws on the protection of personal data in your country.

**14. To contact us.**

14.1. If you have questions, comments or requests, which relate to the Privacy Policy, please contact us by e-mail [school@animationclub.school](mailto:school@animationclub.school).

14.2. Legal address: 25 rue Caillaux, 75013, Paris, France