

**PRIVACY POLICY
OF THE WEBSITE :**

<https://www.sopolyglot.com>

Article 1 PREAMBLE

This Privacy Policy applies to the Website: <https://www.sopolyglot.com> (the "**Website**" or the "**SOPOLYGLOT Website**").

The purpose of this privacy policy is to present to Users of the Website (the "**Users**"):

- The manner in which their personal data is collected and processed. All data that can identify a User must be considered as personal data. This includes first and last name, age, postal address, e-mail address, location of the User or his/her IP address;
- What are the rights of Users concerning this data?
- Who is responsible for the processing of personal data collected and processed;
- To whom this data is transmitted;
- Possibly, the Website's policy regarding "cookies" files.

This privacy policy complements the legal notice and the General Terms and Conditions of Use which Users can consult at the address below:

<https://www.sopolyglot.com>

In the absence of different definition, words beginning with a capital letter have the meaning given to them in the General Terms and Conditions of Use.

Article 2 GENERAL PRINCIPLES OF DATA COLLECTION AND PROCESSING

In accordance with the provisions of the European Regulation 2016/679 known as "GDPR", the collection and processing of data from Users of the Website comply with the following principles:

- Lawfulness, fairness and transparency: data may only be collected and processed with the consent of the User who owns the data. Whenever personal data is collected, the User will be informed that his/her data is being collected and for what purposes it is being collected;
- Limited purposes: the collection and processing of data is carried out to meet one or more of the purposes set out in these general conditions of use ;
- Minimisation of data collection and processing: only the data necessary for the proper execution of the objectives pursued by the Website are collected;

- Conservation of data reduced in time: the data is kept for a limited period of time, of which the User is informed. When this information cannot be communicated, the User is informed of the criteria used to determine the retention period ;
- Integrity and confidentiality of the data collected and processed: the data manager undertakes to guarantee the integrity and confidentiality of the data collected.

In order to be lawful, and in accordance with the requirements of the GDPR, the collection and processing of personal data may only take place if it complies with at least one of the conditions listed below:

- The User has expressly consented to the treatment;
- The processing is necessary for the proper execution of a contract;
- The processing meets a legal obligation;
- The processing is necessary to safeguard the vital interests of the data subject or of another natural person;
- The processing may be necessary for the performance of a task carried out in the public interest or in the exercise of official authority ;
- The processing and collection of personal data is necessary for the purposes of legitimate and private interests pursued by the data manager or a third party.

Article 3 PERSONAL DATA COLLECTED AND PROCESSED WHILE NAVIGATING ON THE WEBSITE

A. DATA COLLECTED AND PROCESSED AND METHOD OF COLLECTION

The personal data collected on the Website are as follows:

User Data :

- First name, last name
- Professional email
- User's home address (Street No., City, Country)
- Phone number
- Password to access the Website
- Composition or brief description of his/her family
- Number of children and ages

Data related to each User's child or each child under the responsibility of the User, aiming to carry out Linguistic Exchange through the Website :

- First name, last name
- Date of Birth
- Areas of interest
- Motivations for carrying out a Linguistic Exchange
- Native tongue(s)
- Spoken Languages
- Photo

Other data :

- Dates and places of the Linguistic Exchanges agreed in the Exchange Contract
- Messages exchanged between Users via Internal Messaging System
- Testimonials from Users and children about Linguistic Exchanges
- Language chosen by each User to navigate on the Website
- IP address or device identifier used by each User to browse the Website
- Acceptance by each User of the General Terms and Conditions of Use of the Website and the service offered on the Website.
- Acceptance by each User of the Privacy Policy regarding the collection and processing of personal data
- The acceptance by each User of cookies
- Acceptance to receive the newsletter or other information from the Website or SOPOLYGLOT.

This data is collected when the User performs one of the following operations on the Website :

- When the User registers to become a Member of the SOPOLYGLOT Community
- When the User fills in his Profile
- When the User writes and submits a Child Profile for his/her child that will be moderated and published by SOPOLYGLOT
- When the User corresponds with another User via the Internal Messaging System
- When the User signs an Exchange Contract with another User
- When the User makes a request via the contact form
- When the User sends a testimonial for publication on the Website
- When the User likes, follows, connects in any other way to a social network to publish content on a SOPOLYGLOT page on a social network
- When the User agrees to receive information (newsletter or other) from SOPOLYGLOT

The data manager will keep in the Website's IT records and in reasonable conditions of security all the data collected for a period of : 3 years.

The collection and processing of data aim at :

improving proposed service, making statistics about users experiences and Linguistic Exchanges.

B. TRANSFER OF DATA TO THIRD PARTIES

Personal data collected by the Website on Users may be transmitted to third parties in accordance with the principles and conditions of this Privacy Policy and more broadly of the GDPR.

In particular, anonymized statistical data relating to the use and traffic of the Website by Users will be communicated to SOPOLYGLOT's customers and to companies

whose employees have access to the Website and to the services offered by SOPOLYGLOT.

C. DATA HOSTING

The Website is hosted by :

CLEVER CLOUD, whose head office is located in Nantes (44000), 3 rue de l'Allier

The host can be contacted at the following phone number: + 33 2 85 52 07 69

The data collected and processed by the Website are exclusively hosted and processed in France.

Article 4 RESPONSIBLE FOR DATA PROCESSING

A. THE DATA MANAGER

The person responsible for the processing of personal data is :

Anne Klemm-Jourdan

She can be contacted as follows:

- by sending an email to contact@sopolyglot.com
- or by writing to the following address:

SOPOLYGLOT SAS

20, rue Robert Julien Lanen

92190 Meudon -France

The data manager is responsible for determining the purposes and means used to process personal data.

B. OBLIGATIONS OF THE DATA MANAGER

The data manager undertakes to protect personal data collected, not to transmit it to third parties without informing Users and to respect purposes for which data was collected.

The Website has an SSL certificate to guarantee that the information and data transfer transiting through the Website are secure.

An SSL certificate ("Secure Socket Layer" certificate) is intended to secure the data exchanged between the User and the Website.

Furthermore, the data manager undertakes to notify the User in the event of rectification or deletion of the data, unless this would involve disproportionate formalities, costs and steps.

In the event that integrity, confidentiality or security of the User's personal data is compromised, the data manager undertakes to inform the User by any means.

Article 5 USER'S RIGHTS

In accordance with the regulations concerning the processing of personal data, the User has the rights listed below.

In order for the data manager to comply with his request, the User is required to provide him with: his/her first and last name as well as his/her e-mail address.

The data manager is obliged to respond to the User within a maximum of 30 (thirty) days.

A. PRESENTATION OF THE USER'S RIGHTS IN TERMS OF DATA COLLECTION AND PROCESSING

1. Right of access, rectification and right to erasure

The User may view, update, modify or request the deletion of his/her personal data by following the procedure set out below:

sending an email to the person in charge of personal data processing, specifying the subject of the request, to the email address contact@sopolyglot.com.

The User has the right to request the deletion of his personal account by following the following procedure:

sending an email to the person in charge of personal data processing, specifying the subject of the request, to the email address contact@sopolyglot.com.

2. Right to data portability

The User has the right to request the portability of his data held by the Website, to another site, by complying with the following procedure:

sending an email to the person in charge of personal data processing, specifying the subject of the request, to the email address contact@sopolyglot.com.

3. Right to limitation and opposition of data processing

The User has the right to request the limitation or to oppose the processing of his/her data by the Website, without the Website being able to refuse, unless it can demonstrate the existence of legitimate and compelling reasons, which may prevail over the interests and the rights and freedoms of the User.

In order to request limitation of the processing of his/her data or to formulate an opposition to the processing of his data, the User must follow the following procedure:

sending an email to the person in charge of personal data processing, specifying the subject of the request, to the email address contact@sopolyglot.com.

4. Right not to be subject to a decision based exclusively on an automated process

In accordance with the provisions of Regulation 2016/679, the User has the right not to be subject to a decision based exclusively on an automated process if the decision produces legal effects concerning him/her, or affects him/her significantly in a similar way.

5. Right to determine the fate of data after death

The User is reminded that he can organize what should happen to his/her data collected and processed if he/she dies, in accordance with the law n°2016-1321 of October 7, 2016.

6. Right to apply to the competent supervisory authority

In the event that the data manager decides not to respond to the User's request, and the User wishes to contest this decision, or, if he/she believes that one of the rights listed above is being infringed, he/she has the right to refer the matter to the CNIL (Commission Nationale de l'Informatique et des Libertés, <https://www.cnil.fr>) or any competent judge.

B. PERSONAL DATA OF MINORS

Consent to the collection and processing of personal data relating to minors children :

- is generally given by their legal representative / parents,
- can only be given by themselves if they are of the age legally required in their country of residence for this purpose.

Article 6 USE OF "COOKIES" FILES

The Website may use "cookies" techniques.

A "cookie" is a small file (less than 4 kb), stored by the Website on the User's hard disk, containing information relating to the User's browsing habits.

These files enable it to process statistics and traffic information, facilitate navigation and improve the service for the User's comfort.

To use "cookies" files involving saving and analysis of personal data, consent of User is necessarily required.

Consent of User is considered valid for a maximum of 13 (thirteen) months. At the end of this period, the Website will again request User's authorization to save "cookies" files on his/her hard disk.

1. Opposition of the User to use "cookies" files on the Website

It is brought to the User's attention that he/she may oppose the recording of these "cookie" files by configuring his/her browser software.

For information, the User can find at the following addresses the steps to follow in order to configure his navigation software to oppose the recording of "cookies" files:

- **Chrome:** <https://support.google.com/accounts/answer/61416?hl=fr>
- **Firefox :** <https://support.mozilla.org/fr/kb/enable-and-disable-cookies-website-preferences>
- **Safari:** <http://www.apple.com/legal/privacy/fr-ww/>
- **Internet Explorer:** <https://support.microsoft.com/fr-fr/help/17442/windows-internet-explorer-delete-manage-cookies>
- **Opera:** <http://www.opera.com/help/tutorials/security/cookies/>

If the User decides to deactivate the "cookies" files, he will be able to continue his navigation on the Website. However, any malfunction of the Website caused by this manipulation could not be considered as being due to the publisher of the Website.

2. Description of "cookies" files used by the Website

The Website publisher draws the User's attention to the fact that the following cookies are used during his/her navigation:

Cookies	Transmitter	Purpose
<u>functional cookies :</u>		
"sopo-token"	SoPolyglot	for authentication
"I18n_redirected"	SoPolyglot	for internationalisation
<u>cookies analytics :</u>		
_ga	Google	User identification by Google Analytics
_gid	Google	identification of the session by Google analytics
_gat	Google	refresh rate

Article 7 CONDITIONS FOR CHANGING THE PRIVACY POLICY

This privacy policy can be consulted at any time at the address below:

<https://www.sopolyglot.com>

The publisher of the Website reserves the right to modify it in order to guarantee its conformity with the law in force.

Therefore, the User is invited to regularly consult this privacy policy in order to be informed of the latest changes that will be made to it.

However, in the event of a substantial change to this policy, the User will be informed as follows:

Notification of a new visit to the Website by the User or email sent to the User

It is brought to the User's attention that this Privacy Policy was last updated on: 15/12/2020.

Article 8 USER ACCEPTANCE OF THE PRIVACY POLICY

By browsing the Website, the User certifies that he/she has read and understood this Privacy Policy and accepts its terms, particularly with regard to the collection and processing of his/her personal data, as well as the use of "cookies" files.