



PRIVACY DECLARATION

PRIVACY POLICY

PURPOSE OF OUR POLICY



INTRODUCTION

Through this document, Lingua Virtus wants to express that we value and respect the privacy of our users (clients and tutors) and recognize the importance of handling personal information in a simple, direct and transparent manner. We adhere to best practices, including implementing appropriate security measures, complying with applicable local and international laws and regulations and maintaining transparency in our operations. This privacy policy describes how we collect, use, disclose, and protect your personal information in accordance with the Australian Privacy Act 1988 (Cth) and Colombia's Law 1581 of 2012, as well as other applicable regulations.

We always strive to adhere to data protection standards, minimize data collection, and ensure that information is used solely for the specified purposes. Additionally, we maintain strict control through the use of SQL systems for data management, limiting their use exclusively to marketing activities with Google.

This privacy policy applies to all users of Lingua Virtus, including our associated trainers, ensuring that all personal data is treated with the same level of protection and respect.

DATA FRAMEWORK



1. DATA COLLECTION FRAMEWORK

1.1. GENERAL DATA

At Lingua Virtus, we strive to make your experience as enjoyable and secure as possible and to achieve this, we collect only the necessary information from users who visit our website and our tutors.

This data may include:

- Name: To make our communications more personal and friendly.
- Email address: To keep you informed of our latest news, respond to your inquiries, and send you useful information.
- Phone number: To quickly contact you if the need arises.
- Contact information: Any other details that help us stay in touch with you.
- Website navigation and usage information: We collect data on how you interact with our site, such as the pages you visit and the time you spend on them, to continuously improve your experience.

We want you to know that we use this information with the utmost care and confidentiality, making it our top priority to create, maintain, and protect the privacy of our community, ensuring that your data is handled securely and responsibly.

DATA FRAMEWORK



1. DATA COLLECTION FRAMEWORK

1.2. TRANSACTIONAL DATA

When you become a client or join us as a tutor, we also store some important transactional data. This data includes:

- **Payment history:** We record these payments to maintain proper and legal control, ensuring that your experience is clear and hassle-free.
- **Payments Lingua Virtus makes to its tutors:** If you are a tutor, we record the payments we make to you to efficiently and transparently manage our business relationships.

In managing this transactional data, we ensure that all financial interactions and transactions are accurate, secure and clear, allowing us to offer a reliable service to the Lingua Virtus community, composed of our clients and tutors, guaranteeing an experience that will only bring benefits to the parties involved.

WHY AND FOR WHAT PURPOSE DO WE PROCESS YOUR DATA?



2. PURPOSE & CASE USES

The personal information we collect serves several key purposes for our operation and community, all focused on improving our services and providing an optimal experience to our community, specifically, we use the information for:

- Contacting leads interested in our English training for the PTE Academic and IELTS exams: We store your information to communicate with you and provide relevant details about our training programs. This allows us to respond to your inquiries, offer personalized support and advice, and keep you informed about how our services can help you achieve your learning goals.
- Redirecting leads to our WhatsApp for assistance by our team: We use your contact information to facilitate quick and direct communication. By redirecting you to our WhatsApp, we can offer you more personalized and efficient service, answer your questions in real-time, providing immediate assistance.
- Conducting marketing activities with Google: We store and use your information to carry out targeted and effective marketing campaigns. This includes showing you relevant ads about our services through platforms like Google Ads. By doing so, we can attract users who may benefit from our training and continuously improve our educational offering.

PROCESSING FRAMEWORK



3. DISCLOSE SCOPE

At Lingua Virtus, we value your privacy and are committed to protecting your personal information. As such, one of our principles is that we do not share, sell or license your personal information to third parties, except in specific situations detailed below. These exceptions are implemented to ensure that we can operate effectively and fulfill our legal and contractual obligations.

- **Service Providers:** We may share your personal information with service providers who act on our behalf, including companies that help us operate our website, manage our technological infrastructure, and provide customer support services. All service providers we work with are required to use your personal information only for the specific purposes for which they were contracted and to protect your information with the same level of care that we do.
- **Legal Compliance:** We may disclose your personal information when required by law. This includes complying with subpoenas, court orders, legal processes or government requests. We commit to notifying you of these requests unless prohibited by law. This disclosure is carried out to meet our legal obligations and protect the rights and safety of Lingua Virtus and its users.

PROCESSING FRAMEWORK



3. DISCLOSE SCOPE

- **Protection of Rights:** We may share your information to protect our rights and intellectual property, including taking measures to investigate, prevent or act on illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our terms of service or as necessary to protect the legitimate interests of Lingua Virtus in accordance with competent authorities and applicable laws.

In all these circumstances, we ensure that your personal information is handled with the utmost respect and used solely for the necessary purposes.

SECURITY FRAMEWORK



4. SECURITY

At Lingua Virtus, the security of your personal information is a priority, we implement various technical and organizational security measures, such as using data encryption platforms, firewalls and access controls to protect your information against unauthorized access, alteration, disclosure or destruction. Additionally, all collected data is under SQL control, which allows us to efficiently manage and secure your information.

Furthermore, all ancillary platforms we use as part of our plans, including the use of video calling platforms, payment platforms, and English practice tools are internationally recognized and have globally respected privacy policies.

We ensure that all tools and services we employ align with our security and privacy standards to be secure vehicles that offer a safe and reliable experience. However, we are not responsible for any failure or non-compliance by these platforms, so any such claim must be made directly through the established channels by them.

Our commitment is to keep our community's data in secure environments and continuously adopt best practices and security technologies to protect your personal information.

SCOPE OF RIGHTS



5. DATA HOLDERS RIGHTS

5.1. Protection Scope:

At Lingua Virtus, we respect and value the rights of personal data holders, in accordance with Colombia's Personal Data Protection Law, Australia's Privacy Principles and other international regulations. Therefore, we declare that you have the following rights:

- **Access to your personal data:** You have the right to request and obtain information about the personal data we have collected and processed about you.
- **Correction of your personal data:** If you find that your personal information is inaccurate or incomplete, you have the right to request its correction or update.
- **Deletion of your personal data:** You may request the deletion of your personal data when it is no longer necessary for the purposes for which it was collected or if you withdraw your consent for its processing.
- **Withdrawal of consent:** You have the right to withdraw your consent for the processing of your personal data at any time, noting that this will not affect the legality of the processing based on consent prior to its withdrawal.

SCOPE OF RIGHTS



5. DATA HOLDERS RIGHTS

- **Restriction of processing:** You may request that we limit the use of your personal data in certain circumstances, for example, while a dispute about the accuracy of your data is resolved.
- **Data portability:** In certain conditions, you have the right to receive the personal data you have provided to us in a structured, commonly used, and machine-readable format.
- **Objection to processing:** You have the right to object to the processing of your personal data when there are legitimate reasons related to your particular situation

5.2. Procedure to exercise rights before Lingua Virtus:

To exercise any of these rights, you can contact us via the following email: info@linguavirtus.com.

Please include the following information in your request:

1. Your name and contact details.
2. A clear and precise description of the right you wish to exercise.
3. A copy of your ID to verify your identity.

We will respond to your request as soon as possible and in any case, within the period established by the applicable regulations. If we are unable to comply with your request, we will provide you with a detailed explanation of the reasons.

TECH AND COLLECTION FRAMEWORK



6. USE OF COOKIES AND OTHER TECHNOLOGIES

At Lingua Virtus, we use cookies and similar technologies to enhance experiences on our website, these are small text files stored on your device when you visit our site. These cookies allow us to recognize your device and remember your preferences, facilitating smoother and more personalized navigation, such as remembering your login credentials, so you don't have to enter them every time you visit our site.

The cookies we use are harmless and are not used for external marketing purposes. We do not sell or share the information collected through cookies with third parties for purposes other than those declared. We use it to better understand how users interact with our website, enabling us to optimize content and improve site functionality. This includes data on the pages you visit, the time you spend on our site, and how you navigate

CONTACT AND VERSION



7. ESSENTIAL DATA PRIVACY

If you have any questions or concerns about this privacy policy, please contact us at:

Email: info@linguavirtus.com

We are committed to responding to your questions and concerns promptly and effectively, emphasizing that your feedback is important to us and we are here to help with any questions you may have about how we handle and protect your personal information.

Whether you need more details about our privacy practices, wish to exercise your rights as a data subject, or simply have a general question, our team is ready to assist you.

We appreciate your trust in us, and we are dedicated to keeping your information secure and your privacy respected.

| VERSION | DATE |
|---------|------------|
| 1.0 | 07-06-2024 |