

## **Privacy Policy of the Website ENmaven <https://enmaven.eu/> ("Website")**

### **Dear User!**

We care about your privacy and want you to feel comfortable while using our services. Therefore, below we present the most important information on the policy for the processing of your personal data and on cookies which are used by our Website. This information has been prepared with regards to the GDPR, i.e. the general data protection regulation.

### **PERSONAL DATA CONTROLLER**

MAGDALENA KAROLINA MICHAŁOWSKA, an entrepreneur running a business under the business name Mind Your English Magdalena Michałowska, entered into the Central Register and Information on Economic Activity kept by the minister competent for economy and keeping the Central Register and Information on Economic Activity, NIP (Tax Identification Number) 8133703443, REGON (National Official Business Register number) 361306736, ul. Warszawska 85, 35-230 Rzeszów, Poland.

If you wish to contact us in relation to our processing of your personal data, please email us at: [maggie@mindyourenglish.pl](mailto:maggie@mindyourenglish.pl).

### **YOUR RIGHTS**

You have the right to request:

- access to your personal data, including obtaining a copy of your data (Article 15 of the GDPR or, if applicable, Article 13 sec. 1(f) of the GDPR),
- their rectification (Article 16 of the GDPR),
- erasure (Article 17 of the GDPR),
- restriction of their processing (Article 18 of the GDPR),
- the transfer of data to another controller (Article 20 of the GDPR),

and the right to:

- object to the processing of your personal data at any time:
  - on grounds relating to your particular situation - with regard to the processing of your personal data based on Article 6 sec. 1(f) of the GDPR (i.e. the legitimate interests pursued by us);
  - if your personal data is processed for the purposes of direct marketing, to the extent that such processing is related to such direct marketing (Art. 21 sec. 2 of the GDPR).

Contact us if you wish to exercise your rights. You can object to our use of cookies (which you will read about below) in particular by using the appropriate settings on your browser.

If you consider that your data is being processed unlawfully, you can lodge a complaint with the competent data protection authority.

## PERSONAL DATA AND PRIVACY

Your data is processed by us for purposes related to the operation of the Website and the provision of the services offered therein. Below you will find detailed information on the processing of your data depending on your activities.

### 1. Use of the free services offered on the Website

<b>For what purpose do we process your data?</b>	
to execute the contract for services offered on the Website	
<b>On what basis do we process your data?</b>	
a contract for provision of services (Article 6 sec. 1(b) of the GDPR)	
<b>For how long will we process your data?</b>	
for the contract period	
in addition, your data will be processed until the expiry of the period during which claims may be asserted - either by you or by us (see the last table of this part for more information)	
<b>What happens if you do not provide the data?</b>	
you will not be able to use our services	

### 2. Use of the paid services offered on the Website

<b>For what purpose do we process your data?</b>	
to execute the contract for services offered on the Website	
<b>On what basis do we process your data?</b>	
a contract for provision of services (Article 6 sec. 1(b) of the GDPR)	a legal obligation, particularly related to accounting, requiring us to process your personal data (Article 6(1)(c) of the GDPR)
<b>For how long will we process your data?</b>	
for the contract period	until the expiry of our legal obligations
in addition, your data will be processed until the expiry of the period during which claims may be asserted - either by you or by us (see the last table of this part for more information)	
<b>What happens if you do not provide the data?</b>	
you will not be able to use our services	

### 3. Taking part in a satisfaction survey about our services provided in connection with the Website

<b>For what purpose do we process your data?</b>
improving the quality of our services thanks to the feedback provided by Users
<b>On what basis do we process your data?</b>
our legitimate interest in processing your data for the purpose of conducting surveys of your satisfaction with our services (Article 6 sec. 1(f) of the GDPR)
<b>For how long will we process your data?</b>
2 years or until we take account of your objection to the processing *
in addition, your data will be processed until the expiry of the period during which claims may be asserted - either by you or by us (see the last table of this part for more information)
<b>What happens if you do not provide the data?</b>
we will not take your opinion on our services into account in the further development of our services

\*whichever is applicable in a particular case

### 4. Contacting us (e.g. to ask a question)

<b>For what purpose do we process your data?</b>	
to respond to your inquiries or requests	
<b>On what basis do we process your data?</b>	
a contract or actions taken at your request prior to entering into a contract (Article 6 sec. 1(b) of the GDPR) - if your enquiry or request relates to a contract to which we are or may be a party	our legitimate interest in processing your data for the purpose of communicating with you (Article 6 sec. 1(f) of the GDPR) - if your enquiry or request is not related to a contract
<b>For how long will we process your data?</b>	
for the duration of the contract binding us or, if no contract is concluded - until the expiry of the claim period - see the last table of this part	until the expiry of the claim period - see the last table in this part or until we have taken account of your objection to the processing*
in addition, your data will be processed until the expiry of the period during which claims may be asserted - either by you or by us (see the last table of this part for more information)	
<b>What happens if you do not provide the data?</b>	
we will not be able to respond to your enquiry or request	

\*whichever is applicable in a particular case

## 5. Signing up for the newsletter

<b>For what purpose do we process your data?</b>	
to send you our newsletter	to analyse the effectiveness of the messages we send, in order to establish general principles for effective messaging in our business activity (read more in the "Analytical activities" part of the Privacy Policy)
<b>On what basis do we process your data?</b>	
a contract for services of sending a newsletter (Article 6 sec. 1(b) of the GDPR)	our legitimate interest in processing the data for the purpose stated above (Article 6 sec. 1(f) of the GDPR)
<b>For how long will we process your data?</b>	
until you unsubscribe from our newsletter	until we have taken account of your objection to the processing
in addition, your data will be processed until the expiry of the period during which claims may be asserted - either by you or by us (see the last table of this part for more information)	
<b>What happens if you do not provide the data?</b>	
you will not be able to receive information regarding the Website and our services	

## 6. Any act or omission which may give rise to a claim relating to the Website or our services

<b>For what purpose do we process your data?</b>
to establish, assert or defend possible claims relating to the contract concluded or the services provided
<b>On what basis do we process your data?</b>
our legitimate interest to process your personal data for the purpose stated above (Article 6 sec. 1(f) of the GDPR)
<b>For how long will we process your data?</b>
until the expiry of the claim period or until we take account of your objection to the data processing*
<b>What happens if you do not provide the data?</b>
inability to establish, assert or defend claims

\*whichever is applicable in a particular case

## ANALYTICAL ACTIVITIES

If you wish to receive newsletter from us, we may analyze the effectiveness of the mailing we have conducted. For example, we can check whether and how it affected activity on our Website. Such activities will help us establish general rules for sending such messages - for example, in terms of optimal sending hours or determining how to formulate effective content.

## DATA SECURITY

When processing your personal data, we use organisational and technical means in accordance with applicable law, including the encryption of the connection using the SSL/TLS protocol.

## COOKIES

Our Website, like most websites, uses the so-called cookies. These cookies:

- are saved in the memory of your device (computer, telephone, etc.);
- do not change the settings of your device.

On our Website, cookies are used for:

- saving your session,
- making the Website functions available.

To learn how to manage cookies, including how to turn them off in your browser, you can use the help file of your browser. You can find out more about this by pressing F1 in your browser. In addition, appropriate tips can be found on the following pages, depending on the browser you are using:

- [Google Chrome](#)
- [Opera](#)
- [Safari](#)
- [Mozilla Firefox](#)
- [Microsoft Edge](#)

Below you can find information on the functions of the cookies we process and their validity period.

Cookie name	Validity period of the cookie	Cookie function
ci_session	120 minutes	user data after logging in (checking if the user is logged in)

Using appropriate options of your browser, you can at any time:

- delete cookies,
- block the use of cookies in the future.

In such cases, we will no longer process them.

## EXTERNAL SERVICES / DATA RECIPIENTS

We use external services to help us in our business. We entrust them with the processing of your data - these processors only process data upon our documented request.

Below you will find a list of the recipients of your data:

ACTION	DATA RECIPIENTS	TRANSFERS OF PERSONAL DATA TO COUNTRIES OUTSIDE THE EUROPEAN UNION
<b>use of the paid services offered on the Website</b>	accounting office	does not take place
	payment processor	does not take place
	provider of the standard office software (including email boxes)	does not take place
<b>use of the free services offered on the on the Website</b>	provider of the standard office software (including email boxes)	does not take place
<b>subscribing to the newsletter or consent to marketing</b>	entity providing newsletter or marketing messaging services	does not take place
<b>contacting us (e.g. to ask a question)</b>	provider of the standard office software (including email boxes)	does not take place

Additionally:

relevant public authorities to the extent that we are required to provide them with the data.