



Train2Talk

Learn Languages – Have Fun – Make Friends

PRIVACY POLICY FOR TRAIN2TALK

(Effective as of 28/January/2019)

PRIVACY NOTICE

This is the privacy notice of Train2Talk and <https://Train2Talk.com>. In this document, "we", "our", or "us" refer to Global Learning Solutions, L.L.C. and Global Learning Solutions LTD.

Protecting your private information is our priority. This Statement of Privacy applies to <https://Train2Talk.com> and governs data collection and usage. For the purposes of this Privacy Policy, unless otherwise noted, all references to Train2Talk including <https://Train2Talk.com>.

POLICY FOR PROCESSING OF PERSONAL DATA

Pursuant to the effect of Article 13 of the New European Regulation 2016/679 concerning the protection of individuals with regards to the processing of personal data (GENERAL DATA PROTECTION REGULATION – GDPR).

As required by the **General Data Protection Regulation of the European Union (GDPR 2016/679, Article 13)**, before proceeding with processing, the interested party (User of the website Train2Talk) is informed that personal data collected through the website are subject to processing by the Company through IT and/or telematics tools, for the purposes indicated in this policy.

To this end, **the User is presented with the Privacy Notice prepared by Train2Talk** (hereafter as "Train2Talk" or "the Company" or "the Data Controller"), creator and promoter of the activities available on the website Train2Talk.

In case of any doubts related to the privacy policy, you can contact us at any time by sending a message to: support@train2talk.com.

1. INTRODUCTION

When accessing the <https://Train2Talk.com> website, it will collect certain information about you during your visit. This is a notice to inform you of what policy Train2Talk has regarding all information that we record about you.

It sets out the conditions under which we may process any information that we collect from you, or that you provide to us. It covers information that could identify you ("personal

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information”) and information that could not. In the context of the law and this notice, “process” means collect, store, transfer, use or otherwise act on information.

1. We regret that if there are one or more points below with which you are not happy, your only recourse is to leave our website immediately.
2. Train2Talk takes seriously the protection of your privacy and confidentiality. We understand that all visitors to our website are entitled to know that their personal data will not be used for any purpose unintended by them, and will not accidentally fall into the hands of a third party.
3. Train2Talk undertakes to preserve the confidentiality of all information you provide to us, and hope that you reciprocate.
4. Our policy complies with the US, & English law accordingly implemented, including that required by the EU General Data Protection Regulation (GDPR).
5. The law requires us to tell you about your rights and our obligations to you in regards to the processing and control of your personal data.
6. Except as set out below, we do not share, or sell, or disclose to a third party, any information collected through our website.

2. THE FOLLOWING OUTLINES THE PROVISIONS OF OUR PRIVACY POLICY:

1. Before or at the time of collecting personal information, we will identify the purposes for which information is being collected. We will collect and use of personal information solely with the objective of fulfilling those purposes specified by us and for other compatible purposes, unless we obtain the consent of the individual concerned or as required by law.
2. We will only retain personal information as long as necessary for the fulfillment of those purposes. We will collect personal information by lawful and fair means and, where appropriate, with the knowledge or consent of the individual concerned.
3. Personal data should be relevant to the purposes for which it is to be used, and, to the extent necessary for those purposes, should be accurate, complete, and up-to-date.
4. We will protect personal information by reasonable security safeguards against loss or theft, as well as unauthorized access, disclosure, copying, use or modification.
5. We will make readily available to customers information about our policies and practices relating to the management of personal information.
6. We are committed to conducting our business in accordance with these principles in order to ensure that the confidentiality of personal information is protected and maintained.

3. COLLECTION OF YOUR PERSONAL INFORMATION

When you visit the Site, we automatically collect certain information about your device, including information about your web browser, IP address, time zone, and some of the cookies that are installed on your device.

Additionally, as you browse the Site, we collect information about the individual web pages or products that you view, what websites or search terms referred you to the Site, and information about how you interact with the Site. We refer to this automatically-collected information as “Device Information”.

4. WE MAY GATHER ADDITIONAL PERSONAL OR NON-PERSONAL INFORMATION IN THE FUTURE.

Train2Talk encourages you to review the privacy statements of websites you choose to link to from Train2Talk so that you can understand how the websites collect, use and share your information.

Train2Talk is not responsible for the privacy statements or other content on websites outside of the Train2Talk website.

5. WHAT INFORMATION WE COLLECT AND WHY?

We may collect information about you directly from you, as well as automatically through your use of our Site or Services. We also may collect information about you as an individual through our customers’ use of the AdBeacon technology.

- Information We Collect Directly From You. Certain areas and features of our Site and Services require registration. To register you must provide your first name, last name, country, phone number and email address. We may collect information directly from you as a data subject through our AdBeacon Technology or third party integrators.
- We may automatically collect the following information about your use of our Site via Google Analytics including the length of time you visit our Site and your movement through our Site.
- We also may collect the following information about your use of AdRemote: mobile device ID; location and language information; device name and model; operating system type, name, and version; your activities within AdRemote; and the length of time that you are logged into AdRemote.

Unlike information we receive through a customer’s use of AdBeacon technology, we may combine this information above with other information that we have collected about you, including, where applicable, your user name, customer name, email and password.

6. IP ADDRESSES

IP addresses are used by your computer every time you are connected to the Internet. Your IP address is a number that is used by computers on the network to identify your computer. IP addresses are automatically collected by our web server as part of demographic and profile data known as “traffic data” so that data (such as the Web pages you request) can be sent to you.

7. EMAIL POLICIES

We are committed to keeping your e-mail address confidential. We do not sell, rent, or lease our subscription lists to third parties, and we will not provide your personal information to any third party individual, government agency, or company at any time unless strictly compelled to do so by law.

- We will use your e-mail address solely to provide timely information about.
- We will maintain the information you send via e-mail in accordance with applicable federal law.

8. WE DO NOT SELL, RENT OR LEASE ITS CUSTOMER LISTS TO THIRD PARTIES.

Train2Talk may, from time to time, contact you on behalf of external business partners about a particular offering that may be of interest to you. In those cases, your uniQue personally identifiable information (e-mail, name, address, telephone number) is transferred to the third party. Train2Talk may share data with trusted partners to help perform statistical analysis, send you email or postal mail, provide customer support, or arrange for deliveries.

All such third parties are prohibited from using your personal information except to provide these services to Train2Talk, and they are required to maintain the confidentiality of your information.

Train2Talk will disclose your personal information, without notice, only if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on Train2Talk or the site; (b) protect and defend the rights or property of Train2Talk; and, (c) act under exigent circumstances to protect the personal safety of users of Train2Talk, or the public.

9. CAN-SPAM COMPLIANCE

In compliance with the CAN-SPAM Act, all e-mail sent from our organization will clearly state who the e-mail is from and provide clear information on how to contact the sender. In addition, all e-mail messages will also contain concise information on how to remove yourself from our mailing list so that you receive no further e-mail communication from us.

10. DATA UNDER EU GDPR COMPLIANCE

Here at Train2Talk we respect and value the right to privacy. We are also consumers and know that it is our responsibility to build a company that protects consumer privacy.

Our services are designed to protect privacy and personal data of consumers.

Train2Talk is considered a “data processor” under the guidelines of the GDPR. Our customers are primarily considered to be “data controllers”, and are responsible for meeting additional privacy or consent gathering requirements for their individual use case.

11. INFORMATION WE PROCESS BECAUSE WE HAVE A CONTRACTUAL OBLIGATION WITH YOU

When you use Train2Talk website, you agree to our terms and conditions, a contract is formed between you and us.

In order to carry out our obligations under that contract we must process the information you give us. Some of this information may be personal information.

We may use it in order to:

- i. Verify your identity for security purposes,
 - ii. Provide you with our services,
 - iii. Provide you with suggestions and advice on services and how to obtain the most from using our website.
- Train2Talk processes this information on the basis there is a contract between us, or that you have requested we use the information before we enter into a legal contract.
 - Additionally, we may aggregate this information in a general way and use it to provide class information, for example to monitor our performance with respect to a particular service we provide. If we use it for this purpose, you as an individual will not be personally identifiable.
 - Train2Talk shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

12. INFORMATION WE PROCESS WITH YOUR CONSENT

Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website or ask us to provide you more information about our business, including our services, you provide your consent to us to process information that may be personal information.

- Wherever possible, we aim to obtain your explicit consent to process this information, for example, by asking you to agree to our use of cookies.
- Sometimes you might give your consent implicitly, such as when you send us a message by e-mail to which you would reasonably expect us to reply.

- Except where you have consented to our use of your information for a specific purpose, we do not use your information in any way that would identify you personally. Train2Talk may aggregate it in a general way and use it to provide class information, for example to monitor the performance of a particular page on our website.
- If you have given us explicit permission to do so, we may from time to time pass your name and contact information to selected associates whom we consider may provide services or products you would find useful.

Train2Talk continues to process your information on this basis until you withdraw your consent or it can be reasonably assumed that your consent no longer exists. You may withdraw your consent at any time by instructing us at support@Train2Talk.com. However, if you do so, you may not be able to use our website or our services further.

13. INFORMATION WE PROCESS FOR THE PURPOSES OF LEGITIMATE INTERESTS

Train2Talk may process information on the basis there is a legitimate interest, either to you or to us, of doing so.

Where we process your information on this basis, we do after having given careful consideration to:

- whether the same objective could be achieved through other means
- whether processing (or not processing) might cause you harm
- whether you would expect us to process your data, and whether you would, in the round, consider it reasonable to do so

For example, we may process your data on this basis for the purposes of:

- record-keeping for the proper and necessary administration of our organizational or business
- responding to unsolicited communication from you to which we believe you would expect a response
- protecting and asserting the legal rights of any party
- insuring against or obtaining professional advice that is reQuired to manage organizational or business risk
- protecting your interests where we believe we have a duty to do so

14. INFORMATION WE PROCESS BECAUSE WE HAVE A LEGAL OBLIGATION UNDER GDPR COMPLIANCE

- Train2Talk is subject to the law like everyone else. Sometimes, we must process your information in order to comply with a statutory obligation.

- For example, we may be required to give information to legal authorities if they so request or if they have the proper authorization such as a search warrant or court order.

15. WE DO NOT SPECIFICALLY USE THIS INFORMATION EXCEPT TO ALLOW IT TO BE DISPLAYED OR SHARED.

- We do store it, and we reserve a right to use it in the future in any way we decide. Once your information enters the public domain, we have no control over what any individual third party may do with it.

Train2Talk and its website accept no responsibility for their actions at any time.

- Provided your request is reasonable and there is no legal basis for us to retain it, then at our discretion we may agree to your request to delete personal information that you have posted. You can make a request by contacting us at support@Train2Talk.com.

16. HOW WE SHARE INFORMATION

We may share your information, including personal information, as follows:

- a) Affiliates. We may disclose the information we collect to our affiliates or subsidiaries; however, if we do so, their use and disclosure of such information will be subject to this Policy.
- b) Service Providers. We may disclose the information we collect to third party vendor, service providers, contractors or agents who perform functions on our behalf.
- c) Business Transfers. If we are acquired by or merged with another company, if substantially all of our assets are transferred to another company, or as part of a bankruptcy proceeding, we may transfer the information we have collected to the other company.
- d) In Response to Legal Process. We also may disclose the information we collect from in order to comply with the law, a judicial proceeding, court order, or other legal process, such as in response to a court order or a subpoena.
- e) To Protect Us and Others. We also may disclose the information we collect where we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of our Terms of Service or this Policy, or as evidence in litigation in which Train2Talk is involved.
- f) Aggregate and De-Identified Information. We may share aggregate or de-identified information collected through the AdBeacon technology about images captured and associated data with our customers for marketing, advertising, research or similar purposes.

17. OPT-OUT & UNSUBSCRIBE

Our site provides users the opportunity to opt-out of receiving communications from us and our partners by reading the unsubscribe instructions located at the bottom of any e-mail they receive from us at any time.

Users who no longer wish to receive our newsletter or promotional materials may opt-out of receiving these communications by clicking on the unsubscribe link in the e-mail.

We respect your privacy and give you an opportunity to opt-out of receiving announcements of certain information.

Users may opt-out of receiving any or all communications from Train2Talk by contacting us here:

Web page: <https://Train2Talk.com>

Email: support@Train2Talk.com

18. SENDING A MESSAGE TO OUR SUPPORT TEAM

When you contact us, whether through our website or by e-mail, we collect the data you have given to us in order to reply with the information you need.

19. APPLICATION

Data collected and analyzed is being used for a variety of applications such as audience measurement and aggregated insights.

20. ANONYMITY

We collect and analyze anonymous data. We cannot, and do not personally identify individuals, at any time, period.

21. COOKIES POLICY UNDER GDPR COMPLIANCE

Similar to other commercial websites, our website utilizes a standard technology called 'cookies' (see explanation below and our cookies policy page for more information) and server logs to collect information about how our site is used. Information gathered through cookies and server logs may include the date and time of visits, the pages viewed, time spent at our site, and the websites visited just before and just after our own, as well as your IP address.

The Train2Talk website uses cookies. They are placed by software that operates on our servers, and by software operated by third parties whose services we use.

22. WHY WE USE COOKIES ON OUR WEBSITE

Cookies are pieces of information that a website transfers to an individual's computer hard drive for record keeping purposes. Cookies make using our Site easier by, among other things, saving your passwords and preferences for you. These cookies are restricted for use only on our Site, and do not transfer any personal information to any other party.

Most browsers are initially set up to accept cookies. You can, however, reset your browser to refuse all cookies or indicate when a cookie is being sent.

Please consult the technical information relevant to your browser for instructions. If you choose to disable your cookies setting or refuse to accept a cookie, some parts of the Site may not function properly or may be considerably slower.

23. MANAGING COOKIES

Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- (a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- (c) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
- (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- (e) <https://support.apple.com/kb/PH21411> (Safari); and
- (f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

24. PERSONAL IDENTIFIERS FROM YOUR BROWSING ACTIVITY

- Information about your computer hardware and software may be automatically collected by Train2Talk. This information can include: your IP address, browser type, domain names, access times and referring website addresses. This information is used for the operation of the service, to maintain quality of the service, and to provide general statistics regarding use of the Train2Talk website.
- Requests by your web browser to our servers for web pages and other content on our website are recorded.
- Train2Talk record information such as your geographical location, your Internet service provider and your IP address. We also record information about the software you are using to browse our website, such as the type of computer or device and the screen resolution.
- Train2Talk uses this information in aggregate to assess the popularity of the webpages on our website and how we perform in providing content to you.

- If combined with other information we know about you from previous visits, the data possibly could be used to identify you personally, even if you are not signed in to our website.

25. OUR USE OF RE-MARKETING

- Re-marketing involves placing a cookie on your computer when you browse our website in order to be able to serve to you an advert for our products or services when you visit some other website.
- Train2Talk may use a third party to provide us with re-marketing services from time to time. If so, then if you have consented to our use of cookies, you may see advertisements for our products and services on other websites.

26. DISCLOSURE AND SHARING OF YOUR INFORMATION

Information we obtain from third parties

Although we do not disclose your personal information to any third party (except as set out in this notice), we sometimes receive data that is indirectly made up from your personal information from third parties whose services we use.

27. USE OF YOUR PERSONAL INFORMATION

- Train2Talk collects and uses your personal information to operate its website(s) and deliver the services you have requested.
- Train2Talk may also use your personally identifiable information to inform you of other services available from Train2Talk and its affiliates. Train2Talk may also contact you via surveys to conduct research about your opinion of current services or of potential new services that may be offered.

28. HOW WE USE YOUR INFORMATION GOTTEN FROM COOKIES

Train2Talk uses your information in order to:

- a) To help us identify you and the account you hold with us;
- b) To inform you about services and/or events which we feel may interest you where you have assented to be contacted for such purposes;
- c) To enable us to evaluate, improve and develop our website and its services;
- d) To inform you about changes to our website and services;
- e) To customize your experience;

- f) To troubleshoot problems and resolve disputes; and
- g) To discover and defend ourselves against error, fraud and other reprehensible activities.

29. THIRD PARTY ADVERTISING ON OUR WEBSITE

Third parties may advertise on our website. In doing so, those parties, their agents or other companies working for them may use technology that automatically collects information about you when their advertisement is displayed on our website.

They may also use other technology such as cookies or JavaScript to personalize the content of, and to measure the performance of their adverts.

Train2Talk does not have control over these technologies or the data that these parties obtain. Accordingly, this privacy notice does not cover the information practices of these third parties.

30. OUR USE OF TRACKING MECHANISMS

We and our third party service providers use tracking mechanisms to track information about use of our Site or Services. We may combine this information with other information we collect from you on our Site (and our third party service providers may do so on our behalf).

Currently, our website does not recognize browser “do-not-track” requests.

31. THIRD PARTY ANALYTICS

We use automated devices and applications, such as Google Analytics, to evaluate usage of our Site and, to the extent permitted, our Services. We also may use other analytic means to evaluate our Services. We use these tools to help us improve our Services, performance and user experiences. These entities may use tracking technologies to perform their services.

32. DATA MAY BE PROCESSED OUTSIDE THE EUROPEAN UNION

Our websites are hosted in the United States.

- Train2Talk may also outsourced services in countries outside the European Union from time to time in other aspects of our business.
- According to data obtained within the US law or any other country could be processed outside the European Union.
- For example, some of the software our website uses may have been developed in LONDON or in the UK.

Train2Talk use the following safeguards with respect to data transferred outside the European Union:

The processing is within the same corporate group as our business or organisation and abides by the same binding corporate rules regarding data processing.

Both our organisation and the processor are public authorities between whom there is either a legally binding agreement or administrative arrangements approved by a supervisory authority in the European Union relating to protection of your information.

33. ACCESS TO YOUR OWN INFORMATION

- At any time you may review or update personally identifiable information that we hold about you, by signing in to your account on our website.
- To obtain a copy of any information that is not provided on our website you may send us a request at: support@Train2Talk.com.
- After receiving the request, we will tell you when we expect to provide you with the information, and whether we require any fee for providing it to you.

34. REMOVAL OF YOUR INFORMATION

If you wish us to remove personally identifiable information from our website, you may contact us at support@Train2Talk.com. Note: This may limit the service we can provide to you.

35. VERIFICATION OF YOUR INFORMATION

When we receive any request to access, edit or delete personal identifiable information we shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

36. HOW YOU CAN COMPLAIN

- i. If you are not happy with our privacy policy or if any complaints then you have should tell us by email. Our address is support@Train2Talk.com.
- ii. If a dispute is not settled then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration.
- iv. If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint by contacting us.

37. RETENTION PERIOD FOR PERSONAL DATA

Except as otherwise mentioned in this privacy notice, Train2Talk keeps your personal information only for as long as required by us:

- i. To provide you with the services you have requested;
- ii. To comply with other law, including for the period demanded by our tax authorities;
- iii. To support a claim or defense in court.

38. SECURITY OF YOUR PERSONAL INFORMATION

- Email is not recognized as a secure medium of communication. For this reason, we request that you do not send private information to us by email. However, doing so is allowed, but at your own risk. Some of the information you may enter on our website may be transmitted securely via a secure medium known as Secure Sockets Layer, or SSL. Credit Card information and other sensitive information are never transmitted via email.
- Train2Talk may use software programs to create summary statistics, which are used for such purposes as assessing the number of visitors to the different sections of our site, what information is of most and least interest, determining technical design specifications, and identifying system performance or problem areas.
- For site security purposes and to ensure that this service remains available to all users, uses software programs to monitor network traffic to identify unauthorized attempts to upload or change information, or otherwise cause damage.
- We secure your personal information from unauthorized access, use, or disclosure.

39. COMPLIANCE WITH THE LAW

Our privacy policy has been compiled so as to comply with the laws of the United Kingdom and every country or legal jurisdiction in which we aim to do business including the European Union Regions under the GDPR Compliance. If you think it fails to satisfy the law of your jurisdiction, we should like to hear from you. However, ultimately it is your choice as to whether you wish to use our website.

40. REVIEW/MODIFICATION OF THIS PRIVACY POLICY

This Policy is current as of the Effective Date set forth above. However, Train2Talk may update this privacy notice from time to time as necessary. The terms that apply to you are those posted here on our website on the day you use our website. We solely advise you to print a copy for your records.

If you have any questions regarding our privacy policy, please contact us.

Email us: support@Train2Talk.com