

# **Privacy Statement**

Newsland Idiomas (Avda, Cardenal Herrera Oria nº 173 bajos 2, 3 y 4. 28035 Madrid) understands that the privacy of its users is important. To that end, we have adopted the following policy with regard to the collection, use, and dissemination of personal information requested from visitors to this site. Personal information is information associated with a user's name or personal identity. We are providing this policy below so that you may understand the terms and conditions associated with the provision of any personal information to us. Please note, however, that this policy has been developed with the recognition that Internet technologies continue to develop and evolve rapidly, and that such changes may require us to alter our Privacy Policy. Any such alterations will not affect our general commitment to the protection of our visitors' privacy. We will post any changes to our Privacy Policy on this page. Your continued use of this Website constitutes acceptance of such terms and policies.

Our privacy policy applies to all personal information collected by us, or submitted to us, whether offline or online, including personal information collected or submitted through our websites and any mobile sites, applications, widgets, and other mobile interactive features through our official social media pages that we control, as well as through HTML-formatted email messages that we send to you. By visiting any of them, you are accepting and consenting to the practices described in this Privacy Policy. If you do not agree with any of the terms of this Privacy Policy, please do not use the website or submit any personal information.

### **General Statement**

You may visit our website without identifying yourself or revealing any personal information. However, certain transactions that you choose to engage in on this site will require your submission of personal information. As a general rule, Newsland Idiomas will not sell, swap, rent, or otherwise disclose to any third party any such personal information for commercial purposes. Such information will be utilized only for the purpose stated. To accomplish such purpose, Newsland Idiomas may disclose the information to its employees, consultants and agents who have a legitimate need to know the information. Newsland Idiomas also reserves the right to disclose this information under special circumstances, including disclosures required by law, court order or circumstances under which disclosure, in the sole discretion of Newsland Idiomas, is necessary to protect the legal rights, including the intellectual property rights, of Newsland Idiomas.

#### How do we collect personal information?

We and our service providers may collect Personal Information in a variety of ways, including: • **Through the Sites:** We may collect Personal Information through the Sites, e.g., when you sign up for a newsletter or make a purchase. • **Offline:** We may collect Personal Information from you offline, such as when you contact customer service. • **From** 

**Other Sources:** We may receive your Personal Information from other sources, such as public databases; joint marketing partners; social media platforms; from people with whom you are friends or otherwise connected on social media platforms, as well as from other third parties. For example, if you elect to connect your social media account to your Website account, certain Personal Information from your social media account can be shared with us, which may include Personal Information that is part of your profile or your friends' profiles.

• **Through your browser or device:** Certain information is collected by most browsers or automatically through your device. We use this information for statistical purposes as well as to ensure that the websites function properly.

• **Through server log files:** Your "IP Address" is a number that is automatically assigned to the computer or device that you are using by your Internet Service Provider. An IP Address is identified and logged automatically in our server log files whenever a user visits the websites, along with the time of the visit and the page(s) that were visited.

• Using cookies: Cookies allow a web server to transfer data to a computer or device for recordkeeping and other purposes. If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to decline the use of cookies. For detailed information about the cookies we use and the purposes for which we use them, please see our cookies policy.

• From you: Information such as date of birth, gender and zip code, as well as other information, such as your preferred means of communication, may be collected when you voluntarily provide this information.

• **Physical Location:** We may collect the physical location of your device. In some cases, we may use a third party payment service to process purchases and/or collect donations made through the websites. In these cases, your Personal Information may be collected by this third party and not by us, and will be subject to the third party's privacy policy, rather than this Privacy Policy. We have no control over, and are not responsible for, this third party's use or disclosure of your Personal Information.

# Usage Information Collected and Use of Information

Newsland Idiomas may collect other information about its users that is not connected with any specific personal identity, such as data about usage and service operation. The following summarizes the types of information that we may collect.

SYSTEM INFORMATION, IP ADDRESSES AND REFERRERS.

When you connect to our website, our web server may record the numerical Internet Protocol (IP) address of the computer you are using, information about your browser and operating system, date and time of access and the internet address and page which linked you to our site. Newsland Idiomas' staff uses such information to help diagnose problems with our server, to administer and improve our website and to generate aggregate statistical reports that analyze general user information and demographics. Unless required by legal process, we do not link IP addresses to anything personally identifiable. This means that user sessions may be tracked by IP address, but a user's identity remains anonymous. We may use Personal Information: • To respond to your inquiries and fulfill your requests, such as to send you newsletters or to respond to your questions and comments. • To send administrative information to you, for example, information regarding the Sites and changes to our terms, conditions, and policies. Because this information may be important to your use of the Sites, you may not opt-out of receiving these communications. • To complete and fulfill your purchase and/or your donation: to process your payments, have your order delivered to you, communicate with you regarding your purchase and provide you with related customer service. • To provide you with updates and announcements concerning our products, promotions and programs and to send you invitations to participate in special programs.

To allow you to contact and be contacted by other users through the websites; • To permit you to participate on message boards, chat, profile pages and blogs and other services to which you are able to post any type of information (including our Social Media Pages). • For our business purposes, such as analyzing and managing our businesses, market research, audits, developing new products, enhancing our websites, improving our services and products, identifying usage trends, determining the effectiveness of our promotional campaigns, tailoring the websites experience and content based on your past activities on the websites, and gauging customer satisfaction and providing customer service (including troubleshooting in connection with customer issues).

• We use information collected by browsers or your device for statistical purposes as well as to ensure that the Sites function properly. • For detailed information about the purposes for which we use cookies, please see our cookies policy. • We may use your device's physical location to provide you with personalized location-based services and content. We may also share your device's physical location, combined with information about what advertisements you viewed and other information we collect, with our marketing partners to enable them to provide you with more personalized content and to study the effectiveness of advertising campaigns. • As we believe to be necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain. • Your personal data will be processed by Newsland Idiomas both within and outside the EU, primarily for the purpose of completing your booking, providing you with the products and services that you have ordered (including travel insurance coverage), and for customer service and marketing activities. Because our servers are located in the EU, our sales teams are based in local offices globally, our head office is in Madrid, and the schools where the students chooses to take the classes are in local offices globally, we may share your personal data with our corporate affiliates, claims handlers and business partners both within and outside the EU. The business partners that we share information with are only such that need access to the Personal Information to process the order that you have placed on the Sites, such as transportation assistance, accommodation, or schools, and they will only receive the information necessary for that purpose. No business partner will receive your Personal Information for their own marketing purposes. Please note that the claims handlers and business partners may change from time to time. Newsland Idiomas processes your personal data in compliance with applicable privacy and data protection legislation. By using our websites, you acknowledge and consent to these potential transfers. You should be aware that many

countries outside the EEA do not afford the same legal protections to personal information as countries within the EEA. Transfers will be made in accordance with the applicable legislation and we will take all necessary measures to ensure that third parties involved will provide an adequate level of protection. Any future hosting/processing organization that we use in relation to the websites will be required to do the same.

### **External Links**

The Newsland Idiomas site contains links to other independently run Web sites that are not controlled by Newsland Idiomas and are not covered by this privacy policy. Newsland Idiomas is not responsible for the privacy practices, security or content of such Web sites.

#### **Security Precautions**

This site has security measures in place to protect the loss, misuse and alteration of the information under our control. Unfortunately, due to the nature of Internet communications, no data transmission over the Internet can be guaranteed to be completely secure. While Newsland Idiomas remains committed to protecting the privacy of our users, we cannot ensure or warrant the security of any information you transmit to us, and you do so at your own risk. Once we receive your transmission, we make our best effort to ensure its security on our systems. We do so by using secure technology, privacy protection controls, and restrictions on employee access, however, we make no representations regarding the veracity of such measures.

#### Access, Modification and Choices

We give you many choices regarding our use and disclosure of your Personal Information for marketing purposes. • If at any time you wish to stop receiving marketing communications from Newsland Idiomas, the easiest way to do so would be to use the unsubscribe feature in the marketing communication you received. You may also let us know by emailing, calling or writing to us using the contact information listed below in the "Contact Us" section. In your request, please indicate that you wish to stop receiving marketing communications from us. • In addition, we will not disclose your Personal Information to third parties, including our subsidiaries, for the third party's direct marketing purposes if we have received and processed a request from you that your Personal Information should not be shared with third parties for that purpose. If you would like to submit such a request, please just let us know by using the "Contact Us" form. Please clearly indicate that you request that we do not disclose your Personal Information to our subsidiaries and/or other third parties for their direct marketing purposes.

Please note that changes may not be effective immediately. We will endeavour to comply with your request(s) as soon as reasonably practicable and in no event later than 30 days after we received your request. Please also note that if you do opt-out of receiving marketing-related messages from us, we may still send you important administrative messages, and you cannot opt-out from receiving administrative messages. • To review, correct, update, suppress, delete or otherwise limit our use of your Personal Information that has been previously provided to us, please use the "Contact Us" form or via letter

(Newsland Idiomas: Avda, Cardenal Herrera Oria nº 173 bajos 2, 3 y 4. 28035 Madrid) and clearly describe your request. In your request, please make clear what information you would like to have changed, whether you would like to have your Personal Information suppressed from our database or otherwise let us know what limitations you would like to put on our use of your Personal Information.

We will try to comply with your request as soon as reasonably practicable. Note that despite our efforts, there may be residual information that will remain within our databases and other records, which will not be removed or changed. Further, please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting such change or deletion (e.g., when you make a purchase or enter a promotion, you may not be able to change or delete the Personal Information provided until after the completion of such purchase or promotion).

#### **Retention Period**

Newsland Idiomas will retain your Personal Information for the period necessary to fulfil the purposes outlined in this Privacy Policy.

# Use Of Sites By Minors

If you are over the age of 16 but under the age of 18, you should review the terms of this Privacy Policy with your parent or guardian to make sure you both understand them. Although we are not responsible for determining the age of our users, we may carry out verification checks. If we learn that we have collected information from an individual under the age of 16 without parental consent, then we will delete that information as soon as possible.

We offer programs for children for purchase by adults. For the protection of children's privacy, we require parental consent from users who wish to make a reservation or order a brochure for one of these programs for any users under the age of 18.

# Sensitive Information

We generally ask that you do not send us, and you do not disclose, any sensitive Personal Information (e.g., information related to racial or ethnic origin, political opinions, religion or other beliefs, health or medical condition, criminal background or trade union membership) on or through the websites or otherwise to us. In specific exceptions, such as insurance requests, we will make clear how you can do this securely.

# Updates To This Privacy Policy

We may change this Privacy Policy. Any changes to this Privacy Policy will become effective when we post the revised Privacy Policy on a Site. Your use of the Sites following these changes means that you accept the revised Privacy Policy.

# Contact Us

Please do not hesitate to contact us if you have any questions, comments or concerns about this Privacy Policy. You have the right to tell us if you: • don't want to be contacted in the future by us; • would like to find out what information we have about you; • if you think that any personal information we hold about you is inaccurate, incomplete, out-ofdate or irrelevant; • wish to report any breaches of the Privacy Policy.

If you have any questions or complaints about this Privacy Policy, please contact us (Newsland Idiomas: Avda, Cardenal Herrera Oria nº 173 bajos 2, 3 y 4. 28035 Madrid). We will investigate any complaint, and notify you of our decision in relation to the complaint, as soon as practicable after it is received.

#### Resumen Cláusula informativa LOPD adaptado al nuevo Reglamento General de Protección de Datos:

Responsable: Identidad: NEWSLAND IDIOMAS S.L.- CIF: B78472131 Dir. Postal: AVDA. CARDENAL HERRERA ORIA 173 BAJOS 2,3 y 4 Teléfono: 917303252 Correo electrónico: info@newslandidiomas.es

En nombre de la empresa tratamos la información que nos facilita con el fin de prestarles el servicio solicitado y realizar la facturación del mismo. Los datos proporcionados se conservarán mientras se mantenga la relación comercial o durante los años necesarios para cumplir con las obligaciones legales. Los datos no se cederán a terceros salvo en los casos en que exista una obligación legal. Usted tiene derecho a obtener confirmación sobre si en NEWSLAND IDIOMAS S.L. estamos tratando sus datos personales por tanto tiene derecho a acceder a sus datos personales, rectificar los datos inexactos o solicitar su supresión cuando los datos ya no sean necesarios.

Asimismo solicito su autorización para ofrecerle productos y servicios relacionados con los solicitados y fidelizarle como cliente.