

# Privacy Policy

**Company:** Surpass IT OÜ (registry code 17154428)

**Address:** Narva mnt 7-634, Kesklinna linnaosa, Harju maakond, Tallinn, 10117, Estonia

**Email:** [info@mylinguiffic.io](mailto:info@mylinguiffic.io)

**Website:** <https://mylinguiffic.io>

## 1. Introduction

At Surpass IT OÜ ("we," "us," "our"), protecting your privacy is a top priority. This Privacy Policy explains how we collect, use, disclose, and safeguard your personal data when you visit or interact with our website (<https://mylinguiffic.io>) or use our AI-driven language learning Services. By accessing or using our Services, you consent to the practices described in this policy.

## 2. Data We Collect

We collect the following categories of personal data:

1. **Identity Data:** Name, username or similar identifiers, title, date of birth, and gender.
2. **Contact Data:** Billing and delivery addresses, email address, and telephone number.
3. **Financial Data:** Bank account or payment card details.
4. **Transaction Data:** Records of payments made, products or services you purchase.
5. **Technical Data:** IP address, login and authentication data, browser type and version, time zone, language settings, plugins, operating system, and device information.
6. **Profile Data:** Username and password, purchase history, preferences, and feedback you provide.
7. **Usage Data:** Information on how you use our website and Services (pages visited, features used, time spent).
8. **Marketing & Communications Data:** Your preferences in receiving marketing materials and communications from us.

## 3. How We Collect Data

We obtain personal data through:

- **Direct Interactions:** Information you submit when creating an account, filling in forms, or communicating with us.
- **Automated Technologies:** Data automatically collected as you navigate our site (e.g., cookies, web beacons).
- **Third Parties & Public Sources:** Data from analytics providers, advertising networks, and publicly available databases.

## 4. Purposes for Processing Your Datas

We process your personal information for the following purposes:

- To create and manage your account and access to our Services.
- To process payments and prevent fraudulent transactions.
- To deliver customer support and respond to your inquiries.
- To personalize content, recommendations, and marketing communications.
- To analyze and improve our website, Services, and offerings.

- To comply with legal obligations and enforce our Terms of Service.

## 5. Legal Basis for Processing

Our lawful grounds for processing personal data include:

- **Contract Performance:** To fulfill our obligations under any agreement with you.
- **Legitimate Interests:** For our business operations (e.g., improving Services), provided your rights are not overridden.
- **Consent:** Where you have given us clear permission (e.g., to send marketing emails).
- **Legal Compliance:** To comply with regulations or respond to lawful requests.

## 6. Data Sharing and Disclosure

We may share your personal data with:

- **Service Providers:** Companies that support our business operations (e.g., payment processors, analytics providers).
- **Affiliates & Subsidiaries:** Other entities within our corporate group.
- **Legal Authorities:** When required by law or to protect our rights.
- **Business Transfers:** In the event of a merger, acquisition, or sale of assets.

We require all third parties to protect your data in accordance with this Privacy Policy and applicable laws.

## 7. Data Security

We implement industry-standard technical and organizational measures to safeguard your data against unauthorized access, alteration, disclosure, or destruction. However, no internet transmission or electronic storage is completely secure.

## 8. Data Retention

We retain your personal data only as long as necessary to fulfill the purposes outlined in this policy, to comply with legal obligations, or to resolve disputes.

## 9. Your Data Rights

Subject to applicable law, you have the right to:

- Access the personal data we hold about you.
- Rectify inaccurate or incomplete data.
- Request erasure of your personal data (“right to be forgotten”).
- Restrict or object to our processing of your data.
- Receive a copy of your data in a structured, machine-readable format.
- Withdraw consent at any time (where processing is based on consent).

## 10. Cookies and Tracking Technologies

We use cookies, web beacons, and similar technologies to enhance your experience, analyze usage, and display targeted advertisements. You can control cookie settings through your browser, but disabling cookies may affect functionality.

## 11. GDPR Compliance

Surpass IT OÜ is committed to complying with the General Data Protection Regulation (GDPR). We have appointed a Data Protection Officer (DPO) responsible for monitoring our data protection strategy and GDPR compliance.

## **12. Changes to This Policy**

We may update this Privacy Policy periodically. Any changes will be posted on our website with an updated revision date. Your continued use of our Services after changes are published constitutes acceptance of those changes.

## **13. Contact Us**

If you have any questions or concerns about this Privacy Policy or our data practices, please contact:

- Surpass IT OÜ
- Narva mnt 7-634, Kesklinna linnaosa,
- Harju maakond, Tallinn 10117, Estonia
- Email: [info@mylinguiffic.io](mailto:info@mylinguiffic.io)

## **14. Date of last update of the current wordings**

July 04, 2025.