

# Privacy Policy of [www.mylingotrip.com](http://www.mylingotrip.com)

This Application collects some Personal Data from its Users.

## Owner and Data Controller

MyLingoTrip, Dorou 6, Thessaloniki, 54633, Greece

**Owner contact email:** [contact@mylingotrip.com](mailto:contact@mylingotrip.com)

## Types of Data collected

Among the types of Personal Data that this Application collects, by itself or through third parties, there are: Cookies, Usage Data, various types of Data, first name, last name, date of birth, phone number, address, email address, password, country, state, ZIP/Postal code, city, billing address, house number, data relating to the point of sale, language, purpose of learning a language, geographic position, unique device identifiers for advertising (Google Advertiser ID or IDFA, for example) and About Me.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using this Application.

Unless specified otherwise, all Data requested by this Application is mandatory and failure to provide this Data may make it impossible for this Application to provide its services. In cases where this Application specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

Any use of Cookies – or of other tracking tools – by this Application or by the owners of third-party services used by this Application serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy, if available.

**Users are responsible for any third-party Personal Data obtained, published or shared through this Application and confirm that they have the third party's consent to provide the Data to the Owner.**

## Mode and place of processing the Data

## **Methods of processing**

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of this Application (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

## **Legal basis of processing**

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes. Note: Under some legislations the Owner may be allowed to process Personal Data until the User objects to such processing (“opt-out”), without having to rely on consent or any other of the following legal bases. This, however, does not apply, whenever the processing of Personal Data is subject to European data protection law;
- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

## **Place**

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

Users are also entitled to learn about the legal basis of Data transfers to a country outside the European Union or to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

If any such transfer takes place, Users can find out more by checking the relevant sections of this document or inquire with the Owner using the information provided in the contact section.

## **Retention time**

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for.

Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right to access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

## **The purposes of processing**

The Data concerning the User is collected to allow the Owner to provide its Services, as well as for the following purposes: Access to third-party accounts, Analytics, Remarketing and behavioral targeting, Handling payments, Backup saving and management, Hosting and backend infrastructure, Advertising, Data transfer outside the EU, Registration and authentication, Managing contacts and sending messages, Interaction with external social networks and platforms, Location-based interactions, Displaying content from external platforms, Tag Management, User database management, Infrastructure monitoring, Contacting the User, Managing landing and invitation pages, Managing support and contact requests, Interaction with support and feedback platforms, Commercial affiliation, Content commenting and Interaction with live chat platforms.

Users can find further detailed information about such purposes of processing and about the specific Personal Data used for each purpose in the respective sections of this document.

## **Detailed information on the processing of Personal Data**

Personal Data is collected for the following purposes and using the following services:

### **Access to third-party accounts**

This type of service allows this Application to access Data from your account on a third-party service and perform actions with it.

These services are not activated automatically, but require explicit authorization by the User.

## Advertising

*This type of service allows User Data to be utilized for advertising communication purposes displayed in the form of banners and other advertisements on this Application, possibly based on User interests.*

*This does not mean that all Personal Data are used for this purpose. Information and conditions of use are shown below.*

*Some of the services listed below may use Cookies to identify Users or they may use the behavioral retargeting technique, i.e. displaying ads tailored to the User's interests and behavior, including those detected outside this Application. For more information, please check the privacy policies of the relevant services.*

*In addition to any opt out offered by any of the services below, the User may opt out of a third-party service's use of cookies by visiting the [Network Advertising Initiative opt-out page](#).*

### **Facebook Audience Network (Facebook, Inc.)**

Facebook Audience Network is an advertising service provided by Facebook, Inc. **In order to understand Facebook's use of Data, consult [Facebook's data policy](#).**

This Application may use identifiers for mobile devices (including Android Advertising ID or Advertising Identifier for iOS, respectively) and technologies similar to cookies to run the Facebook Audience Network service. One of the ways Audience Network shows ads is by using the User's ad preferences. The User can control this in the [Facebook ad settings](#).

Users may opt-out of certain Audience Network targeting through applicable device settings, such as the device advertising settings for mobile phones or by following the instructions in other Audience Network related sections of this privacy policy, if available.

Personal Data collected: Cookies, unique device identifiers for advertising (Google Advertiser ID or IDFA, for example) and Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#). Privacy Shield participant.

## Analytics

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

### **Google Analytics (Google Inc.)**

Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google utilizes the Data collected to track and examine the use of this Application, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#).

### ***Facebook Ads conversion tracking (Facebook, Inc.)***

Facebook Ads conversion tracking is an analytics service provided by Facebook, Inc. that connects data from the Facebook advertising network with actions performed on this Application.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – [Privacy Policy](#). Privacy Shield participant.

### ***Google AdWords conversion tracking (Google Inc.)***

Google AdWords conversion tracking is an analytics service provided by Google Inc. that connects data from the Google AdWords advertising network with actions performed on this Application.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – [Privacy Policy](#). Privacy Shield participant.

### ***LinkedIn conversion tracking (LinkedIn Corporation)***

LinkedIn conversion tracking is an analytics service provided by LinkedIn Corporation that connects data from the LinkedIn advertising network with actions performed on this Application.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – [Privacy Policy](#).

### ***Twitter Ads conversion tracking (Twitter, Inc.)***

Twitter Ads conversion tracking is an analytics service provided by Twitter, Inc. that connects data from the Twitter advertising network with actions performed on this Application.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – [Privacy Policy](#). Privacy Shield participant.

### ***Facebook Analytics for Apps (Facebook, Inc.)***

Facebook Analytics for Apps is an analytics service provided by Facebook, Inc.

Personal Data collected: Usage Data and various types of Data as specified in the privacy policy of the service.

Place of processing: United States – [Privacy Policy](#). Privacy Shield participant.

### **Commercial affiliation**

This type of service allows this Application to display advertisements for third-party products or services. Ads can be displayed either as advertising links or as banners

using various kinds of graphics.

Clicks on the icon or banner posted on the Application are tracked by the third-party services listed below, and are shared with this Application.

For details of which data are collected, please refer to the privacy policy of each service.

## **Contacting the User**

### ***Mailing list or newsletter (this Application)***

By registering on the mailing list or for the newsletter, the User's email address will be added to the contact list of those who may receive email messages containing information of commercial or promotional nature concerning this Application. Your email address might also be added to this list as a result of signing up to this Application or after making a purchase.

Personal Data collected: email address and first name.

### ***Phone contact (this Application)***

Users that provided their phone number might be contacted for commercial or promotional purposes related to this Application, as well as for fulfilling support requests.

Personal Data collected: phone number.

## **Content commenting**

Content commenting services allow Users to make and publish their comments on the contents of this Application.

Depending on the settings chosen by the Owner, Users may also leave anonymous comments. If there is an email address among the Personal Data provided by the User, it may be used to send notifications of comments on the same content. Users are responsible for the content of their own comments.

If a content commenting service provided by third parties is installed, it may still collect web traffic data for the pages where the comment service is installed, even when Users do not use the content commenting service.

### ***Facebook Comments (Facebook, Inc.)***

Facebook Comments is a content commenting service provided by Facebook, Inc. enabling the User to leave comments and share them on the Facebook platform.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – [Privacy Policy](#). Privacy Shield participant.

## **Data transfer outside the EU**

The Owner is allowed to transfer Personal Data collected within the EU to third countries (i.e. any country not part of the EU) only pursuant to a specific legal basis. Any such Data transfer is based on one of the legal bases described below.

Users can inquire with the Owner to learn which legal basis applies to which specific service.

### ***Data transfer abroad based on standard contractual clauses (this Application)***

If this is the legal basis, the transfer of Personal Data from the EU to third countries is carried out by the Owner according to “standard contractual clauses” provided by the European Commission.

This means that Data recipients have committed to process Personal Data in compliance with the data protection standards set forth by EU data protection legislation. For further information, Users are requested to contact the Owner through the contact details provided in the present document.

Personal Data collected: various types of Data.

### ***Data transfer to countries that guarantee European standards (this Application)***

If this is the legal basis, the transfer of Personal Data from the EU to third countries is carried out according to an adequacy decision of the European Commission.

The European Commission adopts adequacy decisions for specific countries whenever it considers that country to possess and provide Personal Data protection standards comparable to those set forth by EU data protection legislation. Users can find an updated list of all adequacy decisions issued on the European Commission's website.

Personal Data collected: various types of Data.

### **Displaying content from external platforms**

This type of service allows you to view content hosted on external platforms directly from the pages of this Application and interact with them.

This type of service might still collect web traffic data for the pages where the service is installed, even when Users do not use it.

#### ***Google Fonts (Google Inc.)***

Google Fonts is a typeface visualization service provided by Google Inc. that allows this Application to incorporate content of this kind on its pages.

Personal Data collected: Usage Data and various types of Data as specified in the privacy policy of the service.

Place of processing: United States – [Privacy Policy](#). Privacy Shield participant.

#### ***YouTube video widget (Google Inc.)***

YouTube is a video content visualization service provided by Google Inc. that allows this Application to incorporate content of this kind on its pages.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – [Privacy Policy](#). Privacy Shield participant.

### **Handling payments**

Payment processing services enable this Application to process payments by credit card, bank transfer or other means. To ensure greater security, this Application shares only the information necessary to execute the transaction with the financial intermediaries

handling the transaction.

Some of these services may also enable the sending of timed messages to the User, such as emails containing invoices or notifications concerning the payment.

### ***PayPal (PayPal Inc.)***

PayPal is a payment service provided by PayPal Inc., which allows Users to make online payments.

Personal Data collected: various types of Data as specified in the privacy policy of the service.

Place of processing: See the PayPal privacy policy – [Privacy Policy](#).

### **Interaction with external social networks and platforms**

This type of service allows interaction with social networks or other external platforms directly from the pages of this Application.

The interaction and information obtained through this Application are always subject to the User's privacy settings for each social network.

This type of service might still collect traffic data for the pages where the service is installed, even when Users do not use it.

### ***Facebook Like button and social widgets (Facebook, Inc.)***

The Facebook Like button and social widgets are services allowing interaction with the Facebook social network provided by Facebook, Inc.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – [Privacy Policy](#). Privacy Shield participant.

### ***PayPal button and widgets (PayPal Inc.)***

The PayPal button and widgets are services allowing interaction with the PayPal platform provided by PayPal Inc.

Personal Data collected: Cookies and Usage Data.

Place of processing: See the PayPal privacy policy – [Privacy Policy](#).

### ***Twitter Tweet button and social widgets (Twitter, Inc.)***

The Twitter Tweet button and social widgets are services allowing interaction with the Twitter social network provided by Twitter, Inc.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – [Privacy Policy](#). Privacy Shield participant.

### ***LinkedIn button and social widgets (LinkedIn Corporation)***

The LinkedIn button and social widgets are services allowing interaction with the LinkedIn social network provided by LinkedIn Corporation.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – [Privacy Policy](#).

### **Interaction with live chat platforms**

This type of service allows Users to interact with third-party live chat platforms directly from the pages of this Application, for contacting and being contacted by this Application support service.

If one of these services is installed, it may collect browsing and Usage Data in the pages where it is installed, even if the Users do not actively use the service. Moreover, live chat conversations may be logged.

### ***Facebook Messenger Customer Chat (Facebook, Inc.)***

The Facebook Messenger Customer Chat is a service for interacting with the Facebook Messenger live chat platform provided by Facebook, Inc.

Personal Data collected: About Me, Cookies and Usage Data.

Place of processing: United States – [Privacy Policy](#). Privacy Shield participant.

### **Remarketing and behavioral targeting**

This type of service allows this Application and its partners to inform, optimize and serve advertising based on past use of this Application by the User.

This activity is performed by tracking Usage Data and by using Cookies, information that is transferred to the partners that manage the remarketing and behavioral targeting activity.

In addition to any opt out offered by any of the services below, the User may opt out of a third-party service's use of cookies by visiting the [Network Advertising Initiative opt-out page](#).

### ***AdWords Remarketing (Google Inc.)***

AdWords Remarketing is a remarketing and behavioral targeting service provided by Google Inc. that connects the activity of this Application with the Adwords advertising network and the Doubleclick Cookie.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#).

### ***Facebook Remarketing (Facebook, Inc.)***

Facebook Remarketing is a remarketing and behavioral targeting service provided by Facebook, Inc. that connects the activity of this Application with the Facebook advertising network.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#). Privacy Shield participant.

#### ***Twitter Remarketing (Twitter, Inc.)***

Twitter Remarketing is a remarketing and behavioral targeting service provided by Twitter, Inc. that connects the activity of this Application with the Twitter advertising network.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#). Privacy Shield participant.

#### ***LinkedIn Website Retargeting (LinkedIn Corporation)***

LinkedIn Website Retargeting is a remarketing and behavioral targeting service provided by LinkedIn Corporation that connects the activity of this Application with the LinkedIn advertising network.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#).

#### ***Facebook Custom Audience (Facebook, Inc.)***

Facebook Custom Audience is a remarketing and behavioral targeting service provided by Facebook, Inc. that connects the activity of this Application with the Facebook advertising network.

Personal Data collected: Cookies and email address.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#). Privacy Shield participant.

### **Tag Management**

This type of service helps the Owner to manage the tags or scripts needed on this Application in a centralized fashion. This results in the Users' Data flowing through these services, potentially resulting in the retention of this Data.

#### ***Google Tag Manager (Google LLC)***

Google Tag Manager is a tag management service provided by Google LLC.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – [Privacy Policy](#). Privacy Shield participant.

## User database management

This type of service allows the Owner to build user profiles by starting from an email address, a personal name, or other information that the User provides to this Application, as well as to track User activities through analytics features. This Personal Data may also be matched with publicly available information about the User (such as social networks' profiles) and used to build private profiles that the Owner can display and use for improving this Application.

Some of these services may also enable the sending of timed messages to the User, such as emails based on specific actions performed on this Application.

## The rights of Users

Users may exercise certain rights regarding their Data processed by the Owner.

In particular, Users have the right to do the following:

- **Withdraw their consent at any time.** Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- **Object to processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent. Further details are provided in the dedicated section below.
- **Access their Data.** Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- **Verify and seek rectification.** Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- **Restrict the processing of their Data.** Users have the right, under certain circumstances, to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- **Have their Personal Data deleted or otherwise removed.** Users have the right, under certain circumstances, to obtain the erasure of their Data from the Owner.
- **Receive their Data and have it transferred to another controller.** Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance. This provision is applicable provided that the Data is processed by automated means and that the processing is based on the User's consent, on a contract which the User is part of or on pre-contractual obligations thereof.
- **Lodge a complaint.** Users have the right to bring a claim before their competent data protection authority.

### Details about the right to object to processing

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time without providing any justification. To learn, whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

## **How to exercise these rights**

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. These requests can be exercised free of charge and will be addressed by the Owner as early as possible and always within one month.

## **Cookie Policy**

This Application uses Cookies. To learn more and for a detailed cookie notice, the User may consult the Cookie Policy.

## **Additional information about Data collection and processing**

### **Legal action**

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of this Application or the related Services.

The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

### **Additional information about User's Personal Data**

In addition to the information contained in this privacy policy, this Application may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

### **System logs and maintenance**

For operation and maintenance purposes, this Application and any third-party services may collect files that record interaction with this Application (System logs) use other Personal Data (such as the IP Address) for this purpose.

### **Information not contained in this policy**

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

### **How “Do Not Track” requests are handled**

This Application does not support “Do Not Track” requests.

To determine whether any of the third-party services it uses honor the “Do Not Track” requests, please read their privacy policies.

### **Changes to this privacy policy**

The Owner reserves the right to make changes to this privacy policy at any time without giving further notice to its Users on this page. It is strongly recommended to check this page often, referring to the date of the last modification.

Should the changes affect processing activities performed on the basis of the User's consent, the Owner shall collect new consent from the User, where required.

## **Definitions and legal references**

### ***Personal Data (or Data)***

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

### ***Usage Data***

Information collected automatically through this Application (or third-party services employed in this Application), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Application, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

### ***Legal information***

This privacy statement has been prepared based on provisions of multiple legislations, including Art. 13/14 of Regulation (EU) 2016/679 (General Data Protection Regulation).

This privacy policy relates solely to this Application, if not stated otherwise within this document.

Latest update: May 30, 2018