

# Cookie Policy of [www.learnenglishfacil.com](http://www.learnenglishfacil.com)

To find more information on California consumers and their privacy rights, Users may [read the privacy policy](#).

To find more information on Virginia consumers and their privacy rights, Users may [read the privacy policy](#).

To find more information on Colorado consumers and their privacy rights, Users may [read the privacy policy](#).

To find more information on Connecticut consumers and their privacy rights, Users may [read the privacy policy](#).

To find more information on Utah consumers and their privacy rights, Users may [read the privacy policy](#).

This document informs Users about the technologies that help this Application to achieve the purposes described below. Such technologies allow the Owner to access and store information (for example by using a Cookie) or use resources (for example by running a script) on a User's device as they interact with this Application.

For simplicity, all such technologies are defined as "Trackers" within this document – unless there is a reason to differentiate. For example, while Cookies can be used on both web and mobile browsers, it would be inaccurate to talk about Cookies in the context of mobile apps as they are a browser-based Tracker. For this reason, within this document, the term Cookies is only used where it is specifically meant to indicate that particular type of Tracker.

Some of the purposes for which Trackers are used may also require the User's consent, depending on the applicable law. Whenever consent is given, it can be freely withdrawn at any time following the instructions provided in this document.

This Application uses Trackers managed directly by the Owner (so-called "first-party" Trackers) and Trackers that enable services provided by a third-party (so-called "third-party" Trackers). Unless otherwise specified within this document, third-party providers may access the Trackers managed by them.

The validity and expiration periods of Cookies and other similar Trackers may vary depending on the lifetime set by the Owner or the relevant provider. Some of them expire upon termination of the User's browsing session.

In addition to what's specified in the descriptions within each of the categories below, Users may find more precise and updated information regarding lifetime specification as well as any other relevant information – such as the presence of other Trackers - in the linked privacy policies of the respective third-party providers or by contacting the Owner.

## Activities strictly necessary for the operation of this Application and delivery of the Service

This Application uses so-called "technical" Cookies and other similar Trackers to carry out activities that are strictly necessary for the operation or delivery of the Service.

### First-party Trackers

### Further information about Personal Data

#### Preference Cookies (this Application)

Preference Cookies store the User preferences detected on this Application in the local domain such as, for example, their timezone and region.

Personal Data processed: Trackers.

#### localStorage (this Application)

localStorage allows this Application to store and access data right in the User's browser with no expiration date.

Personal Data processed: Trackers.

#### sessionStorage (this Application)

sessionStorage allows this Application to store and access data right in the User's browser. Data in sessionStorage is deleted automatically when the session ends (in other words, when the browser tab is closed).

Personal Data processed: Trackers.

### Third-party Trackers

## SPAM protection

This type of service analyses the traffic of this Application, potentially containing Users' Personal Data, with the purpose of filtering it from parts of traffic, messages and content that are recognised as SPAM.

### Google reCAPTCHA (Google Ireland Limited)

Google reCAPTCHA is a SPAM protection service provided by Google Ireland Limited. The use of reCAPTCHA is subject to the Google [privacy policy](#) and [terms of use](#).

Personal Data processed: answers to questions, clicks, keypress events, motion sensor events, mouse movements, scroll position, touch events, Trackers and Usage Data.

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

Storage duration:

- `_GRECAPTCHA`: duration of the session
- `rc::a`: indefinite
- `rc::b`: duration of the session
- `rc::c`: duration of the session

## Collection of privacy-related preferences

This type of service allows this Application to collect and store Users' preferences related to the collection, use, and processing of their personal information, as requested by the applicable privacy legislation.

### iubenda Privacy Controls and Cookie Solution (iubenda srl)

The iubenda Privacy Controls and Cookie Solution allows the Owner to collect and store Users' preferences related to the processing of personal information and in particular to the use of Cookies and other Trackers on this Application.

Personal Data processed: Trackers.

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

### iubenda Consent Database (iubenda srl)

The iubenda Consent Database allows to store and retrieve records of Users' consent to the processing of Personal Data, and information and preferences expressed in relation to the provided consent.

In order to do so, it makes use of a Tracker that temporarily stores pending information on the User's device until it is processed by the API. The Tracker (a browser feature called localStorage) is at that point deleted.

Personal Data processed: Data communicated while using the service and Trackers.

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

Storage duration:

- ConS JS library localStorage (IUB\_DATA): indefinite

## Handling payments

Unless otherwise specified, this Application processes any payments by credit card, bank transfer or other means via external payment service providers. In general and unless where otherwise stated, Users are requested to provide their payment details and personal information directly to such payment service providers. This Application isn't involved in the collection and processing of such information: instead, it will only receive a notification by the relevant payment service provider as to whether payment has been successfully completed.

### PayPal (PayPal Inc.)

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

Personal Data processed: device information, email address, first name, last name, phone number, purchase history, Trackers, Usage Data and various types of Data as specified in the privacy policy of the service.

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

Storage duration:

- `__paypal_storage__`: indefinite
- `akavpau_ppsd`: duration of the session
- `enforce_policy`: duration of the session
- `l7_az`: duration of the session
- `nsid`: duration of the session
- `ts`: duration of the session
- `tsrce`: duration of the session
- `x-cdn`: duration of the session
- `x-pp-s`: duration of the session

### **PayPal Carrier Payments (PayPal Inc.)**

PayPal Carrier Payments is a payment service provided by PayPal, Inc., which allows Users to make online payments using their mobile phone operator.

Personal Data processed: device information, email address, first name, last name, phone number, purchase history, Trackers, Usage Data and various types of Data as specified in the privacy policy of the service.

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

Storage duration:

- `akavpau_ppsd`: duration of the session
- `ts`: duration of the session

### **PayPal Payments Hub (PayPal Inc.)**

PayPal Payments Hub is a payment service provided by PayPal Inc.

Personal Data processed: device information, email address, first name, last name, phone number, purchase history, Trackers, Usage Data and various types of Data as specified in the privacy policy of the service.

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

Storage duration:

- `akavpau_ppsd`: duration of the session
- `ts`: duration of the session

### **Quaderno (Recrea Systems, SLU)**

Quaderno is a billing management and product checkout page service provided by Recrea Systems, SLU, which allows the Owner to automate tax compliance for online payments on this Application.

Personal Data processed: billing address, coarse location, country, email address, first name, last name, phone number, purchase history, Trackers and Usage Data.

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

## **Other activities involving the use of Trackers**

### **Functionality**

This Application uses Trackers to enable basic interactions and functionalities, allowing Users to access selected features of the Service and facilitating the User's communication with the Owner.

### **Handling activities related to productivity**

This type of service helps the Owner to manage tasks, collaboration and, in general, activities related to productivity. In using this type of service, Data of Users will be processed and may be retained, depending on the purpose of the activity in question. These services may be integrated with a wide range of third-party services disclosed within this privacy policy to enable the Owner to import or export Data needed for the relative activity.

### **Calendly (Calendly, LLC)**

Calendly is a service provided by Calendly, LLC, that facilitates online scheduling of appointments.

Personal Data processed: device information, email address, geographic position, name, phone number and Trackers.

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

#### **Gmail (Google LLC)**

Gmail is a service that manages email communication provided by Google LLC. Such email communication is not scanned by Google for advertising purposes. In addition, Google does not collect or use data inside this service for advertising purposes in any other way.

Personal Data processed: city, company name, country, Data communicated while using the service, date of birth, email address, first name, last name, phone number, physical address, Trackers and Usage Data.

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

#### **Registration and authentication**

By registering or authenticating, Users allow this Application to identify them and give them access to dedicated services. Depending on what is described below, third parties may provide registration and authentication services. In this case, this Application will be able to access some Data, stored by these third-party services, for registration or identification purposes. Some of the services listed below may also collect Personal Data for targeting and profiling purposes; to find out more, please refer to the description of each service.

#### **Facebook Oauth (Meta Platforms Ireland Limited)**

Facebook Oauth is a registration and authentication service provided by Meta Platforms Ireland Limited and is connected to the Facebook social network.

Personal Data processed: Trackers and various types of Data.

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

Storage duration:

- \_fbp: 3 months

#### **Facebook Authentication (Meta Platforms Ireland Limited)**

Facebook Authentication is a registration and authentication service provided by Meta Platforms Ireland Limited and is connected to the Facebook social network.

Personal Data processed: Trackers and various types of Data as specified in the privacy policy of the service.

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

Storage duration:

- \_fbp: 3 months
- fbssls\_\*: duration of the session

#### **Linkedin OAuth (LinkedIn Corporation)**

Linkedin Oauth is a registration and authentication service provided by LinkedIn Corporation and is connected to the LinkedIn social network.

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

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

Storage duration:

- JSESSIONID: duration of the session
- bcookie: 1 year
- bscookie: 1 year
- lang: duration of the session
- lissc: 1 year

### **Stripe OAuth (Stripe Payments Ltd)**

Stripe OAuth is a registration and authentication service provided by Stripe, Inc. and is connected to the Stripe network.

Personal Data processed: Trackers and various types of Data as specified in the privacy policy of the service.

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

Storage duration:

- \_\_stripe\_mid: 1 year
- \_\_stripe\_sid: 30 minutes

## **Experience**

This Application uses Trackers to improve the quality of the user experience and enable interactions with external content, networks and platforms.

### **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 authorisation by the User.

### **Stripe account access (Stripe Payments Ltd)**

This service allows this Application to connect with the User's account on Stripe, provided by Stripe, Inc.

Personal Data processed: device information, email address, first name, last name, Trackers and Usage Data.

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

Storage duration:

- \_\_stripe\_mid: 1 year
- \_\_stripe\_sid: 30 minutes

### **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 Ireland Limited)**

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

Personal Data processed: Trackers and Usage Data.

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

### **Font Awesome (Fonticons, Inc. )**

Font Awesome is a typeface visualisation service provided by Fonticons, Inc. that allows this Application to incorporate content of this kind on its pages.

Personal Data processed: Trackers and Usage Data.

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

### **Fonts.com Web Fonts (Monotype Imaging Inc.)**

Fonts.com Web Fonts is a typeface visualisation service provided by Monotype Imaging Inc. that allows this Application to incorporate content of this kind on its pages.

Personal Data processed: Trackers and Usage Data.

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

#### **Calendly widget (Calendly, LLC)**

Calendly widget is a calendar content visualisation service provided by Calendly, LLC that allows this Application to incorporate content of this kind on its pages.

Personal Data processed: calendar information, device information, email address, geographic position, name, phone number and Trackers.

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

#### **Wistia widget (Wistia, Inc.)**

Wistia is a video content visualisation service provided by Wistia, Inc. that allows this Application to incorporate content of this kind on its pages.

Personal Data processed: Trackers and Usage Data.

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

#### **Google Calendar widget (Google Ireland Limited)**

Google Calendar widget is a calendar content visualisation service provided by Google Ireland Limited that allows this Application to incorporate content of this kind on its pages.

Personal Data processed: Trackers and Usage Data.

Place of processing: Ireland – [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. It is recommended to log out from the respective services in order to make sure that the processed data on this Application isn't being connected back to the User's profile.

#### **Twitter Tweet button and social widgets (X Corp.)**

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

Personal Data processed: Trackers and Usage Data.

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

Storage duration:

- personalization\_id: 2 years

#### **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 processed: Trackers and Usage Data.

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

Storage duration:

- akavpau\_ppsd: duration of the session
- ts: duration of the session

#### **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 processed: Trackers and Usage Data.

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

Storage duration:

- AnalyticsSyncHistory: 1 month
- JSESSIONID: duration of the session
- UserMatchHistory: 1 month
- bcookie: 1 year
- bscookie: 1 year
- lang: duration of the session
- lidc: 1 day
- lissc: 1 year
- lms\_ads: 1 month
- lms\_analytics: 1 month

#### **Google Friend Connect (Google Ireland Limited)**

Google Friend Connect is a social interaction service provided by Google Ireland Limited.

Personal Data processed: Trackers and Usage Data.

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

#### **Facebook Like button and social widgets (Meta Platforms Ireland Limited)**

The Facebook Like button and social widgets are services allowing interaction with the Facebook social network provided by Meta Platforms Ireland Limited

Personal Data processed: Trackers and Usage Data.

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

Storage duration:

- \_fbp: 3 months

## **Measurement**

This Application uses Trackers to measure traffic and analyse User behaviour to improve the Service.

### **Analytics**

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

#### **Google Analytics (Google Ireland Limited)**

Google Analytics is a web analysis service provided by Google Ireland Limited (“Google”). Google utilises 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 contextualise and personalise the ads of its own advertising network.

Personal Data processed: Trackers and Usage Data.

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

Storage duration:

- AMP\_TOKEN: 1 hour
- \_ga: 2 years
- \_gac\*: 3 months
- \_gat: 1 minute
- \_gid: 1 day

## Google Analytics Demographics and Interests reports (Google Ireland Limited)

Google Analytics Demographics and Interests reports is a Google Advertising Reporting feature that makes available demographic and interests Data inside Google Analytics for this Application (demographics means age and gender Data).

Users can opt out of Google's use of cookies by visiting Google's [Ads Settings](#).

Personal Data processed: Trackers and unique device identifiers for advertising (Google Advertiser ID or IDFA, for example).

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

Storage duration:

- IDE: 2 years
- `_gcl_*`: 3 months
- `test_cookie`: 15 minutes

## Heat mapping and session recording

Heat mapping services are used to display the areas of this Application that Users interact with most frequently. This shows where the points of interest are. These services make it possible to monitor and analyse web traffic and keep track of User behaviour.

Some of these services may record sessions and make them available for later visual playback.

### Hotjar Heat Maps & Recordings (Hotjar Ltd.)

Hotjar is a session recording and heat mapping service provided by Hotjar Ltd.

Hotjar honours generic „Do Not Track” headers. This means the browser can tell its script not to collect any of the User's data. This is a setting that is available in all major browsers. Find Hotjar's [opt-out information here](#).

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

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

Storage duration:

- `_hjAbsoluteSessionInProgress`: 30 minutes
- `_hjCachedUserAttributes`: duration of the session
- `_hjClosedSurveyInvites`: 1 year
- `_hjDonePolls`: 1 year
- `_hjFirstSeen`: duration of the session
- `_hjIncludedInSessionSample`: 30 minutes
- `_hjLocalStorageTest`: duration of the session
- `_hjLocalStorageTest`: duration of the session
- `_hjMinimizedPolls`: 1 year
- `_hjSession*`: 30 minutes
- `_hjSessionRejected`: duration of the session
- `_hjSessionResumed`: duration of the session
- `_hjSessionTooLarge`: 1 hour
- `_hjSessionUser*`: 1 year
- `_hjSessionUser_*`: 2 years
- `_hjShownFeedbackMessage`: 1 year
- `_hjTLDDTest`: duration of the session
- `_hjUserAttributesHash`: duration of the session
- `_hjViewportId`: duration of the session
- `_hjid`: 1 year

## How to manage preferences and provide or withdraw consent

There are various ways to manage Tracker related preferences and to provide and withdraw consent, where relevant:

Users can manage preferences related to Trackers from directly within their own device settings, for example, by preventing the use or storage of Trackers.

Additionally, whenever the use of Trackers is based on consent, Users can provide or withdraw such consent by setting their preferences within the cookie notice or by updating such preferences accordingly via the relevant consent-preferences privacy widget, if available.



It is also possible, via relevant browser or device features, to delete previously stored Trackers, including those used to remember the User's initial consent preferences.

Other Trackers in the browser's local memory may be cleared by deleting the browsing history.

With regard to any third-party Trackers, Users can manage their preferences via the related opt-out link (where provided), by using the means indicated in the third party's privacy policy, or by contacting the third party.

## **Locating Tracker Settings**

Users can, for example, find information about how to manage Cookies in the most commonly used browsers at the following addresses:

- [Google Chrome](#)
- [Mozilla Firefox](#)
- [Apple Safari](#)
- [Microsoft Internet Explorer](#)
- [Microsoft Edge](#)
- [Brave](#)
- [Opera](#)

Users may also manage certain categories of Trackers used on mobile apps by opting out through relevant device settings such as the device advertising settings for mobile devices, or tracking settings in general (Users may open the device settings and look for the relevant setting).

## **Consequences of denying the use of Trackers**

Users are free to decide whether or not to allow the use of Trackers. However, please note that Trackers help this Application to provide a better experience and advanced functionalities to Users (in line with the purposes outlined in this document). Therefore, if the User chooses to block the use of Trackers, the Owner may be unable to provide related features.

## **Owner and Data Controller**

LEF Educational Services Ltd - 14 Orchard Close - AL1 1JP - St Albans - UK

Contacto: Español

+44 7930241139

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

Since the use of third-party Trackers through this Application cannot be fully controlled by the Owner, any specific references to third-party Trackers are to be considered indicative. In order to obtain complete information, Users are kindly requested to consult the privacy policies of the respective third-party services listed in this document.

Given the objective complexity surrounding tracking technologies, Users are encouraged to contact the Owner should they wish to receive any further information on the use of such technologies by this Application.

## **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 utilised by the Users who use this Application, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilised 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 utilised 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.

### **User**

The individual using this Application who, unless otherwise specified, coincides with the Data Subject.

### **Data Subject**

The natural person to whom the Personal Data refers.

### **Data Processor (or Processor)**

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

### **Data Controller (or Owner)**

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of this Application. The Data Controller, unless otherwise specified, is the Owner of this Application.

### **This Application**

The means by which the Personal Data of the User is collected and processed.

### **Service**

The service provided by this Application as described in the relative terms (if available) and on this site/application.

### **European Union (or EU)**

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

### **Cookie**

Cookies are Trackers consisting of small sets of data stored in the User's browser.

### **Tracker**

Tracker indicates any technology - e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that enables the tracking of Users, for example by accessing or storing information on the User's device.

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### **Legal information**

This privacy statement has been prepared based on provisions of multiple legislations.

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

Latest update: 6 March 2023