

# Privacy Policy of JANOLO

JANOLO collects some Personal Data from its Users.

This document can be printed for reference by using the print command in the settings of any browser.

## Owner and Data Controller

JANOLO - 13 allée du verger du vallon, 74380 Lucinges, France

**Owner contact email:** admin@janolocreative.com

## Types of Data collected

Among the types of Personal Data that JANOLO collects, by itself or through third parties, there are: Usage Data; payment info; email address; last name; name; geographic position.

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 JANOLO.

Unless specified otherwise, all Data requested by JANOLO is mandatory and failure to provide this Data may make it impossible for JANOLO to provide its services. In cases where JANOLO 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 JANOLO or by the owners of third-party services used by JANOLO 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 JANOLO.

## Mode and place of processing the Data

### Methods of processing

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

The Data processing is carried out using computers and/or IT enabled tools, following organisational 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 JANOLO (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.

### 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.

### Retention time

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

## The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal

obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following: Platform services and hosting, Hosting and backend infrastructure, Handling payments, Managing contacts and sending messages and Handling activities related to productivity.

For specific information about the Personal Data used for each purpose, the User may refer to the section "Detailed information on the processing of Personal Data".

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

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

### **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: email address; geographic position; name.

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

### **Handling payments**

Unless otherwise specified, JANOLO 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. JANOLO 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.

#### **Stripe ( Stripe Technology Europe Ltd)**

Stripe is a payment service provided by Stripe Technology Europe Ltd.

Personal Data processed: payment info.

Place of processing: European Union - [Privacy Policy](#).

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

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

Personal Data processed: payment info.

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

#### **Apple Pay (Apple Inc.)**

Apple Pay is a payment service provided by Apple Inc., which allows Users to make payments using their mobile phones.

Personal Data processed: email address; last name; payment info.

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

### **Hosting and backend infrastructure**

This type of service has the purpose of hosting Data and files that enable JANOLO to run and be distributed as well as to provide a ready-made infrastructure to run specific features or parts of JANOLO.

Some services among those listed below, if any, may work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

## **DigitalOcean (DigitalOcean Inc.)**

DigitalOcean is a hosting service provided by DigitalOcean Inc.

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

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

## **Managing contacts and sending messages**

This type of service makes it possible to manage a database of email contacts, phone contacts or any other contact information to communicate with the User.

These services may also collect data concerning the date and time when the message was viewed by the User, as well as when the User interacted with it, such as by clicking on links included in the message.

## **Mailchimp (Intuit Inc.)**

Mailchimp is an email address management and message sending service provided by Intuit Inc.

Personal Data processed: email address.

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

## **Platform services and hosting**

These services have the purpose of hosting and running key components of JANOLO, therefore allowing the provision of JANOLO from within a unified platform. Such platforms provide a wide range of tools to the Owner – e.g. analytics, user registration, commenting, database management, e-commerce, payment processing – that imply the collection and handling of Personal Data.

Some of these services work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

## **WordPress.com (Automattic Inc.)**

WordPress.com is a platform provided by Automattic Inc. that allows the Owner to build, run and host JANOLO.

Personal Data processed: Usage Data.

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

## **Further information about the processing of Personal Data**

### **Learn dash**

This sample language includes the basics around what personal data your LMS may be collecting, storing and sharing, as well as who may have access to that data. Depending on what settings are enabled and which additional plugins are used, the specific information shared by your site will vary. We recommend consulting with a lawyer when deciding what information to disclose on your privacy policy.

We collect information about you during the course purchase process (PayPal, Stripe, and/or 2Checkout), as well as information relating to your course progression and quiz performance.

What we collect and store

When you purchase from us, we'll ask you to provide email address. We'll use this information for purposes, such as, to:

--Send you information about your account and order

--Create your account for our LMS

If you register a free account then we will store your email address.

We store information about you for as long as your account exists.

We store course progress, including completion status, quiz scores, assignments and/or essay submissions (if applicable).

We will also store comments on courses, lessons, topics, assignments, and essays if you choose to leave

them.

#### Who on our team has access

Members of our team have access to the information you provide us. For example, both Administrators and Group Leaders can access:

--Order information such as your enrolled courses, course progress and username / email address.

Any additional information added in your WordPress User Profile can also be visible to the administrator(s).

#### What we share with others

In this section you should list who you're sharing data with, and for what purpose. This could include, but may not be limited to, analytics/reporting tools, marketing services (such as email services like MailChimp), payment gateways, gamification programs, and third party embeds.

We share information with third parties who help us provide our orders and store services to you; for example - [insert third party platforms and short description of their purpose]

#### Payments

In this subsection you should list which third party payment processors you're using to take payments on your store since these may handle customer data. We've included PayPal below as an example, but you should remove any of these if they are not in use on your site.

We accept payments through PayPal. When processing payments, some of your data will be passed to PayPal, including information required to process or support the payment, such as the purchase total and billing information.

Please see the PayPal Privacy Policy for more details.

## Memberpress

#### Introduction

This sample language includes the basics around what personal data your MemberPress plugin may be collecting, storing and sharing, as well as who may have access to that data. Depending on what settings are enabled and which additional addons are used, the specific information shared by your site will vary. We recommend consulting with a lawyer when deciding what information to disclose on your privacy policy.

Source: MemberPress

Who we are

Our website address: MemberPress

Contact us at: <https://memberpress.com/customer-support/>

Our Privacy Policy: Privacy Policy

What personal data we collect and why we collect it

We collect information about you during the signup process as well as some basic activities such as the dates you make purchases, login to the site, or cancel/pause/resume your subscriptions with us.

#### What we collect and store

When you subscribe with us, we'll ask you to provide an email address. We'll use this information for purposes, such as, to:

— Send you information about your account and subscriptions. This may include payment receipts, password reset emails, and payment reminders.

— Create your membership account

How long we retain your data

We store information about you for as long as your account exists.

#### Who on our team has access

Members of our team have access to the information you provide us. For example, site Owner/Administrators can access:

— Order information such as your membership subscriptions, payment dates and amounts, and username / email address.

Any additional information added in your Member Profile can also be visible to the Administrator(s).

#### What we share with others

In this section you should list who you're sharing data with, and for what purpose. This could include, but may not be limited to, analytics/reporting tools, marketing services (such as email services like MailChimp, AWeber or ConvertKit), payment gateways, and third party embeds.

We share information with third parties who help us provide additional contact services to you; for example – [enter your third party platforms such as Analytics, Email Marketing, or any others and short description of their purpose. If you have a DPA from that service, this would be a good place to include that also.]

### Payments

In this subsection you should list which third party payment processors you're using to take payments on your store since these may handle customer data. We've included PayPal below as an example, but you should remove any of these if they are not in use on your site.

We accept payments through PayPal. When processing payments, some of your data will be passed to PayPal, including information required to process or support the payment, such as the purchase total and billing information.

## Further Information for Users

### 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.

### Further information about retention time

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users’ consent.

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 of 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 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, to the extent permitted by law:

- **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.

- **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 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 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.
- **Lodge a complaint.** Users have the right to bring a claim before their competent data protection authority.

Users are also entitled to learn about the legal basis for Data transfers abroad including 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.

### **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, free of charge and without providing any justification. Where the User objects to processing for direct marketing purposes, the Personal Data will no longer be processed for such purposes. 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 answered by the Owner as early as possible and always within one month, providing Users with the information required by law. Any rectification or erasure of Personal Data or restriction of processing will be communicated by the Owner to each recipient, if any, to whom the Personal Data has been disclosed unless this proves impossible or involves disproportionate effort. At the Users' request, the Owner will inform them about those recipients.

## **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 JANOLO 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, JANOLO 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, JANOLO and any third-party services may collect files that record interaction with JANOLO (System logs) or 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.

## **Changes to this privacy policy**

The Owner reserves the right to make changes to this privacy policy at any time by notifying its Users on this page and possibly within JANOLO and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

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 JANOLO (or third-party services employed in JANOLO), which can include: the IP addresses or domain names of the computers utilised by the Users who use JANOLO, 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 JANOLO 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 JANOLO. The Data Controller, unless otherwise specified, is the Owner of JANOLO.

### **JANOLO (or this Application)**

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

### **Service**

The service provided by JANOLO 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.

### **Legal information**

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

Latest update: 4 September 2023