

*Updated: April 21, 2025*

## **COPANYON PRIVACY POLICY**

Copanyon is committed to protecting your personal data. We have taken great care to draft this Privacy Policy in clear and straightforward language. Additionally, we aim to present our privacy commitments transparently and accessibly. Our goal is to provide you with all necessary information to assure you that your personal data is secure with us.

Before providing your consent for the processing of your personal data or submitting any personal data through forms on our website, we request that you read this Privacy Policy thoroughly to ensure that you fully understand the conditions under which we will collaborate.

This Privacy Policy applies to your use of the Services of Copanyon, as defined in our [Terms of Service](#). This Privacy Policy explains when, where, and why we process the personal data of individuals who use the Copanyon Platform, how we use it, the conditions under which we may disclose it to others, your rights in respect of your personal data, as well as how we keep Users' personal data and information secure.

All the capitalized and defined terms in Copanyon's Terms of Service are incorporated by reference herein.

### **GENERAL**

Access to the Copanyon Platform (including Website, related software and Copanyon mobile device application) is available with or without the necessity to register an account. You may access our Website without registration. To be able to use the Copanyon mobile device application, you will first need to register an account. Therefore, limited use of the Services is always possible without the provision of your personal details (for example, browse the Website, check how Copanyon works, look through the list of Hosts, read the Copanyon Blog, review the variety of services, etc.). However, whenever you access the Website, we collect log information and may put cookies on your device, by which we track your activity on the Website. You can always opt out of cookies except those without which the Website cannot work.

When you are a registered user, Copanyon may collect from you and process cookie identifiers, data and information you specifically provide us with upon registration, including first name, last name, email, phone number, social network ID (if assigned through Facebook or if accessing Google Calendar), time zone, interface language, IP address, and device type.

Specifically, if you are a Host, we may also collect certain information in addition to the other data provided by you, including zip code, gender, year of birth, city of residence, interests, likes and education experience.

Registered users may additionally provide profile pictures as well as chosen currency to perform actions pursuant to our [Refund and Payments Policy](#).

You can find out more about the specific cases of data collection and the purposes of the

processing of such data in a separate section of this Privacy Policy.

We may change this Privacy Policy from time to time, so please check this page to ensure that you're happy with any changes. We will post those changes on this page and update the Privacy Policy modification date at the top of this page. Additional notifications on any amendments will be sent to your email.

We may also occasionally experiment with different features of the Copanyon Platform or may add new features, which can affect the scope, purposes, or other details of the processing of personal data. In such cases we will provide prior notification and, if necessary, obtain your consent.

Any questions regarding this Policy and our services should be sent to [legal@Copanyon.com](mailto:legal@Copanyon.com).

## 1. What Is Personal Data and the Processing of Personal Data? Main Definitions

**Users of the Copanyon Platform.** A person may interact with the Copanyon Platform as a Patron, Host, or Visitor (collectively as a "User"). See Terms of Service for more details. A Host offers meetups to a Patron in exchange for payment, and both Hosts and Patrons must create user accounts, while a Visitor is any individual who accesses the Platform without registering as either a Host or Patron.

**Personal data** is any information that relates to an identified or identifiable individual. This includes information that can be used on its own or in combination with other information to directly or indirectly identify you. Examples of Personal Data include, but are not limited to:

- Your full name, username, and email address
- Contact details such as phone number or mailing address
- Profile information including photos, videos, or voice recordings
- IP address and device identifiers
- Billing and payment information
- Geolocation data
- Any other information that you choose to provide through your use of the Copanyon Platform and Services.

**Processing of the personal data** means any operation with your personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Data subject** is any identified or identifiable natural person whose personal data is processed by the controller responsible for the processing; means you as a user of Copanyon.

**Consent of the data subject/user** is any freely given, specific, informed, and unambiguous indication of the data subject/user's wishes by which he or she, by a statement or by clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

## 2. Copanyon's Lawful Bases for Processing

Copanyon processes your personal data only when we have lawful bases. Specifically, Copanyon processes your personal data if:

- Processing is based on the consent you have given. As such our collection, analysis, and publication of user feedback and reviews, analysis of video meetups, your participation in Copanyon hosted events and webinars, and placement of different types of cookies, and such other publications or postings based on your consent;
- Processing is based on the express consent you have given to us and our online verification provider to process your biometric information for the purposes of User identity verification and fraud identification;
- Processing is necessary for the purposes of Copanyon’s legitimate interests. Those legitimate interests may include but are not limited to:
  - Compliance with the U.S. financial and accounting legislation;
  - The assessment of Copanyon’s business efficiency by analyzing the Copanyon Platform traffic and financial performance indicators;
  - The promotion of Copanyon through social media networks, media outlets, and affiliates, such as bloggers or influencers; this in particular concerns the right of Copanyon to use the User’s name, profile picture and other details for marketing, advertising or promotional purposes pursuant to the [Terms of Service](#);
  - The performance of contracts with Copanyon’s Business customers and provision of reports on their employees’ and contractors’ strategic and legitimate business interests;
  - User session control and fraud prevention, ensuring the appropriate protection of personal data
  - User verification and development of high-quality services;
  - AI data training, as may be implemented in the future.
- Where necessary, compliance with applicable legislation (e.g., data subject request processing);
- In exceptional cases, to protect your vital interests or vital interests of another natural person; or for the performance of a task carried out in the public interest or in the exercise of official authority vested in us

In all cases, we will notify you about the applied legal basis for processing and other relevant details before we start the processing of your personal data on a specific legal basis unless we are not able to do so in accordance with our obligations under any applicable legislation.

**3. Data We Collect: Scope.** Copanyon collects from you only the following information and only for the stated below purposes:

3.1. **Patron Accounts.** Copanyon collects and processes personal data submitted by you upon registration and further editing of settings in your Account and profile page. For registration purposes, you submit your login credentials (username and password), first name, last name, and email. You may also edit your Account anytime with additional information as well as sync your Google and Copanyon Calendars or your other social media pages. Such additional information may help you find a suitable time slot with another User or Host, or allow other Users to have more visibility of your schedule. At the same time, you are not required to provide additional information not specifically necessary for the registration; it is your choice.

3.2. **Account for Hosts.** Copanyon collects and processes personal data submitted by you upon registration and further editing of your profile. For registration purposes, you submit your login credentials (username and password), first name, last name, and email. Although not required, you may provide information about you, including your professional qualifications, education, interests and subject matter expertise. You may also edit your profile anytime with additional information as well as sync your Google and Copanyon Calendars, or other social media platforms. Such additional information may help you find a suitable time slot with a Patron or have more visibility of your schedule. At the same time, you are not strictly required to provide additional information not specifically necessary for the registration. Therefore, it is your choice whether to include additional data in your profile or not, such as zip code, country, language skills, work experience, hobbies, interests and information related to gender

Some personal data, such as users' names and location, that is listed in your User profiles or derived from IP addresses may be publicly visible to other Users on the Copanyon Platform or to the web. We may implement a feature that permits you to choose what information is made public by changing your privacy setting in "Edit My Profile" within the Service.

3.3. **Subscription to the Copanyon General.** Notifications. By registering as a User, you may receive general notifications from Copanyon via Email such as newsletters and updates. For this, we require you to give us your email.

3.4. **Posting of Information.** We process personal data freely submitted to you on Copanyon. This may be a survey and online form you fill in on Copanyon, a question or comment left in the [Q&A section](#) of our Website, or feedback you provide us with.

Copanyon may also process information provided by you (including content and messages) that you post on/through the Copanyon Platform, including personally identifiable information. By doing so, you acknowledge that any information you share through the Services will be available to Copanyon and to other users of the Services. You also acknowledge that parts of your content cannot be deleted from the Service as it may be connected to the Meetups created by you and used by other users.

From our turn and unless you **opt out**, we retain this information as necessary to resolve disputes, provide customer support and troubleshoot problems as permitted by law. We reserve the right to terminate the accounts of Users who use these services in a manner inconsistent with the [Terms of Service](#).

3.5. **Service Use, Cookies and Other Similar Technologies.**

When you use our Services, we monitor and analyze web traffic and keep track of your behavior.

Please refer to our [Cookie Policy](#) for further details as to our use of cookies and similar technologies.

### **3.6. Billing Information.**

We process the details of transactions you carry out through the Copanyon Platform (such as ID, date and time of transaction).

### **3.7. Copanyon Business.**

We may collect your name, email, company name and phone number to give you more information regarding Copanyon Business Services, as defined in [Copanyon Business Terms](#).

### **3.8. Sensitive Data.**

Unless you expressly agree, Copanyon does not process your sensitive data.

### **3.9. Pages on Social Networks.**

We maintain Copanyon's official pages on social networks, such as Facebook, TikTok, Instagram and LinkedIn. When you interact with Copanyon's official pages in social networks, such as subscribing to the pages or leaving comments or reactions (e.g., 'like' our posts), we can analyze this data to measure our efficiency and conduct an analysis of our social media marketing campaigns in our legitimate interests.

### **3.10. Information Required for Submitting Tax Documentation.**

To comply with the applicable tax and accounting legislation, we may be required to submit various tax documentation containing your personal data. For example, a federal tax form 1099 or such other required tax form(s) necessary to receive a sweepstakes prize or withhold taxes. For submitting tax documentation, we may process your personal data, including, but not limited to, your full name, country of citizenship, permanent residence address, mailing address, date of birth, U.S. taxpayer identification number, or foreign tax identifying number.

The Directive (EU) 2021/514 (DAC7) requires us as a digital platform operator to collect, verify, and report data and information on reportable sellers (i.e., Hosts to whom DAC7 applies) conducting relevant activities through the Copanyon Platform. To comply with our reporting obligations under DAC7, we may process your first name, last name, primary address, date of birth, tax identification number (TIN), VAT number, and financial account identifier (e.g., bank account).

To the extent applicable, Copanyon may rely on third party payment platforms such as Stripe or Wise to collect, manage and distribute the relevant tax information and documentation for Users.

### **3.11. Information Required for Marketing and Promotion.**

We may collect the User's postal address to promote the Services that you provide or receive via the Copanyon Platform and help you reach more prospective Patrons looking for Services within a certain geographical area.

### **3.12. Video Lessons, Sales Calls, Events, and Webinars.**

We may process your voice recordings, session or meetup recordings, likeness and interactions in videos when you conduct/take group classes or individual lessons on the Copanyon Platform, take part in sales calls, or attend our webinars and events. We will not record you without giving notice first and asking for your consent if required.

### **3.13. Information Processed by AI-Powered Tools.**

We may integrate certain third-party AI-powered tools to enhance your experience on

the Copanyon Platform and to support AI training and development. For example, we may process your text prompts, voice recordings, audio files, video session recordings, and session transcripts to offer personalized recommendations, generate session summaries, improve communication tools, suggest relevant content or activities, assess engagement levels, and enable chatbot functionality for real-time assistance and follow-up inquiries..

#### **3.14. Host Verification (for Hosts Only).**

We may process your facial biometrics (we have engaged a third-party online verification provider for this purpose) and your ID to verify your identity and identify fraud.

#### **3.15. Information about B2B Leads'/Clients' Representatives.**

We may process personal data relating to representatives of our Business-to-Business (B2B) leads and clients. This may include information such as name, email address, phone number, job title, company name, and similar identifiers. We use this data for the following purposes: (i) sales and marketing activities – including outreach, lead qualification, follow-up communication, and promotional campaigns aimed at offering relevant products or services; and (ii) fulfillment of contractual obligations – including the administration of agreements, provision of services, and delivery of documentation, updates, and other related communications.

### **4. Data We Collect: Purposes**

We may process the personal data you voluntarily provide for the purposes outlined below. Our aim is to tailor your experience on the Copanyon Platform as effectively as possible and to deliver high-quality services to you and all Users in accordance with our [Terms of Service](#).

### **5. Provision of Services**

Primarily, Copanyon processes your personal data to authorize access to our Services and to fulfill our obligations under the [Terms of Service](#) for Services provision. Specifically, we may use your personal data upon registration to help others find your account or profile, schedule, host or participate as a Patron in Services, and track user history and preferences.

In order for you to use the Services, you will need to provide payment (e.g. credit card or bank account details) and billing information through our partners – third-party merchant payment providers, which process your personal data encrypted and securely. Please see our [Refund and Payment Policy](#) for more information.

For companies using the Copanyon Business Services, we process the personal data of their Authorized Users to create their accounts, enable access to the Services, provide language assessment, language learning progress reports and results of language assessment tests.

Please note that without the information provided by you under our [Terms of Service](#), we will be unable to provide you with the functionality of Copanyon Platform, connect you with other Users, allow you to communicate via the Copanyon Platform, or process payments and payouts.

### **6. Payment Services**

We use third-party payment providers to bill you through an online account payment in lieu of directly processing your credit/debit card or bank account information. Your paid balance for one or more session is safe in your account as we use an integrated iframe for checkouts from our partners-payment providers (e.g. Stripe, PayPal, Wise) and Hosts get the payment for each confirmed lesson securely through third-party payment providers (Stripe, PayPal, Wise). Correspondingly all transactions are secured as our partners-payment providers use SSL

encryption protection. All payment information is stored encrypted and securely by Stripe and/or Wise. We do not store your payment information on our servers.

We may also use your payment card transaction data as shared by third-party service providers to confirm a specific transaction occurred and that you qualify for a promotional offer; for example, the date and amount of your purchase and the last 4 digits of your card number so that we can verify your purchase with our records.

## **7. Referral Programs**

For our “Invite-a-Friend” referral program, we generate a personalized referral link for you to share with your friends to sign them up. We will not collect your friend’s personal data until they follow the link and access the Copanyon Platform.

For our B2B referral program, you will be able to share the name, job position and email of your colleagues who may be interested in Copanyon Business Services. We will inform your colleagues that we’ve received their personal data in the course of our referral program at the time of initial contact.

Copanyon does not collect any personal information about your friends until they voluntarily register on the Copanyon Platform.

## **8. Communications**

We may contact you via email and other ways, including through publicly available notices, for Services-related purposes (welcome letter, security and legal notices, announcements, Copanyon updates, reminders, suggestions, etc.). We may also use your data to enable you to communicate with other Users through Copanyon, including exchanging messages, conducting video calls, and/or leaving feedback about other Users.

You may also receive certain push notifications via Copanyon mobile device application. You are able to adjust such notifications using the internal settings of your smartphone.

Upon receiving communications from Copaynon, you are always able to opt out of such communications in each message, excluding legal notices, essential reminders/notifications or changes of User settings on Copanyon.

## **9. User Research**

Your contact data (including email, phone number, username, etc.) may also be used for gathering feedback. We may contact you to participate in research to improve the user experience of our product. The research will be used for internal purposes only, including: (i) Feature development and product updates; (ii) Marketing activities, including publishing them on Copanyon on other information resources; (iii) Customer Support updates; and (iv) Other service updates for improving your experience.

Your feedback will not be video recorded, audio recorded, or webcast by the interviewer without obtaining consent from you first. The same applies to your voice and/or image recording.

## **10. Marketing and Promotion of Copanyon**

We may process your first name, last name and email on our mailing list or for the newsletter and send you messages with some commercial or promotional information about Copanyon’s Services. Before doing so, we will request your consent first, and you may always opt out of our marketing messages using the mechanisms described under the respective link in each message and through the user settings available on Copanyon.

We may use the postal address collected from you upon your consent in connection

with search engine marketing and optimization.

The information provided by you as feedback may be used by Copanyon without any additional compensation to you pursuant to the [Terms of Service](#).

#### **11. Behavioral and Social Media Marketing**

We may share your email address with Google and Meta for the purpose of delivering personalized advertisements to you and engaging in behavioral and social media marketing. We will conduct these marketing activities based on our legitimate interest and with consideration for your interests and privacy.

#### **12. Identifying Influencers for Potential Collaborations**

We may use third-party services to analyze the information you provide to us at the time of registration (such as your name and other identifiers), execute a matching exercise, and discover our most influential Users for potential collaborations in the future. In doing so, we may receive some of your personal data from third parties' data gathering service providers. If you wish to be an influencer who collaborates with Copanyon, we will provide you with a short privacy notice explaining this influencer processing activity in detail.

#### **13. Analytics and Development**

In order to establish new ways to improve the Copanyon Platform, find the points of interest in our Services and for the purposes of analytics, we monitor and analyze the personal data you provide us with, including information you provide upon registration, the web traffic, cookies and usage data, such as the parts of our Services you visit, the date and duration of your visit, your location, type of the device you used during your visit and other relevant data on the use of the Copanyon Platform. For these purposes, we may use services such as Google Analytics, among other service providers, the use of which ensures compliance with our privacy commitments.

For the purposes indicated above, we may also run occasional research activities, including personalized tests or analysis of certain sessions. The purpose of such tests is to understand User engagement and satisfaction with certain features on the Copanyon Platform in order to improve the User experience, develop new useful features, and streamline our Services.

We may also carry out polls and surveys through Copanyon using external third-party service providers. You are not obliged to respond to them and you may opt out of such polls and surveys through user settings. In order to inform, optimize and serve you relevant advertising based on your past use of our Services, we may process your usage data and cookies. Please refer to our [Cookie Policy](#) for additional information.

#### **14. Improvement of Hosts' Ranking Algorithm**

We gather and use various metric-based data to enhance the hosts' ranking algorithm and improve your experience on the basis of our legitimate interest. This data may also consist of personal data that the Hosts and students provide on the Copanyon Platform. You can refer to our [Terms of Service](#) to learn more about the categories of data we may collect.

## **15. Support and Platform Supervision**

In case of any disputes on Copanyon and other Services related issues, we may use data (including communications) to resolve such matters, supervise user behavior on the Copanyon Platform, and respond to any complaints or requests.

## **16. Events and Webinars Conducted by Copanyon**

We use the personal data we collect from you when you register and/or attend any of our events or webinars to provide you with access to such events or webinars, as well as to send you registration confirmation, reminders, associated useful materials or the information you have requested about our Services.

## **17. Compliance with Legal Requirements**

We process certain payment information to comply with applicable legal requirements in the field of finances and/or accounting. We also may process the data collected on the Copanyon Platform in connection with legal requests we receive from you or any other competent person and/or body, and we may use this information to exercise, defend and/or establish our legal rights.

## **18. Fraud Prevention**

Certain information, such as your log in information, payment information and your behavior on the Copanyon Platform are subject to our supervision to prevent fraudulent activities and assist you in managing your user sessions.

## **19. Platform Adaptation (for Hosts Only)**

If you choose to provide your information related to gender in your profile setting page, we will process such data to make the Copanyon Platform more adaptive to you.

## **20. Changes**

We may change the Copanyon Privacy Policy from time to time. Upon any changes to this Policy, your rights may not be reduced unless you provide explicit consent. The latest version is posted on this page. If we make substantial changes, we will notify you by sending an email.

## **21. How Is Personal Data Shared?**

In order to provide high-quality services, Copanyon hires people, enters into agreements with independent contractors as well as cooperates with other services providers, companies and organizations strictly under data processing agreements (DPA) or Standard Contractual Clauses (SCCs). For those reasons, some of your personal data can be passed to the persons mentioned. Copanyon uses only secure places of storage, such as those provided by AWS (Amazon, the USA), with servers located in Ireland, Germany and the United States.

## **22. Categories of Third-Party Service Providers**

We may share personal data with various categories of third-party service providers to support and enhance the functionality of the Copanyon Platform. These providers include those offering analytics, social media and search engine integrations, customer communication tools, user research platforms, email and push notification services, SMS marketing systems, and payment processing solutions. Additionally, we may engage AI-powered services, video conferencing and transcription tools, influencer marketing platforms, language assessment technologies, SEO and marketing providers, online identity verification services, and software

for tax and accounting compliance. The personal data shared may include contact details, personal identifiers, usage data, and other relevant information necessary to deliver or improve these services.

### **23. Use of Social Network Platforms**

We use social network platforms like Facebook, Instagram, LinkedIn, and TikTok to maintain Copanyon’s social media pages.

Please note that LinkedIn may act both as a processor engaged by Copanyon and as an independent controller of your personal data. Additionally, TikTok and Copanyon may independently process your personal data as independent controllers.

As for Copanyon’s [Facebook](#) and [Instagram](#) pages, Meta Platforms, Inc. (“Meta”) is a joint controller for the processing of personal data. In particular, Meta and Copanyon are joint controllers for the pages’ insight data and statistics, your reactions and comments under our posts, and other information you make available to Copanyon upon contacting us.

You may find more information on the Meta joint controllership arrangement at the following link: [https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum).

You may contact us with any questions related to your activity on Copanyon’s social media pages on the above-mentioned social network platforms or our processing of your personal data.

The service providers mentioned under this subsection will help us ensure that your data is secure within Copanyon.

Copanyon has contractors and subsidiaries in other countries, including those outside the European Economic Area, who may have access to your personal data. At the same time, in the cases when we pass your personal data to other persons, Copanyon ensures that your personal data is being protected and used only within the purposes specified in this Privacy Policy. This is achieved by using only certified services and products, signing data processing agreements for the protection of personal data with contractors and partners (including the Standard Contractual Clauses adopted by the European Commission and compliant with the EU data protection laws), as well as taking technical measures to ensure the information is protected when stored, used and while being processed and transferred.

### **24. Data Transfer in Case of Change of Control or Asset Disposition**

In the event of any merger, acquisition, sale or change of control, we’ll continue to ensure the confidentiality of your personal data and give affected users notice before personal data is transferred or becomes subject to a different privacy policy.

### **25. Companies Using Copanyon Business Services**

We may share the Authorized Users’ language learning progress and results of language assessment tests with their respective employers.

### **26. Copanyon Independent Contractors**

We engage independent contractors to support the delivery of our Services. These contractors may assist with data analytics, software development, customer support, marketing and promotion, user research, and financial or legal operations. Access to your personal data is granted strictly on a need-to-know basis and is subject to robust confidentiality, privacy, and security obligations.

### **27. Other Users of the Copanyon Platform**

Your personal data may also be made visible to visitors and users of the Copanyon Platform. This can happen via personal contacts (between a Patron and Host), or in connection with the social features of the Copanyon Platform. For example, your profile picture and name may be visible if you have signed up for a group session or if when you leave a Host review.

## **28. How Long Will the Personal Data Be Processed and Stored by Copanyon?**

Your personal data will be stored by Copanyon for no longer than necessary for the purposes for which the personal data is processed.

Generally, Copanyon retains your personal data as long as your account is active. If your last activity on Copanyon was more than 2 years ago, your account will be considered expired. In this case or when you decide to delete your Copanyon account, we undertake to remove your personal data from our active systems and servers within 90 days or earlier.

Copanyon may store your personal data processed by AI-powered tools for AI data training purposes for 2 years in the EU and longer for non-EU jurisdictions.

However, in case of conflict situations in progress, Copanyon may retain your personal data for longer in order to be able to establish, exercise or defend legal claims. Upon the settlement of the conflict situation, all personal data gets deleted if the standard retention period has expired.

We may also retain some of your personal data for longer if we need it to comply with the applicable legal, regulatory, tax, accounting or other requirements.

Personal Data collected when you registered on our mailing list or for the newsletter will be stored as long as you are interested in receiving our emails. We consider that you're interested in receiving emails and marketing materials until you unsubscribe from the mailing list or the newsletter by clicking the respective link contained in each of our emails.

If you have registered for any of our events or webinars using your account credentials, we will merge and store this information along with your account data. If you have used other contact details, we will delete them within 30 days after conducting the event or webinar.

After the expiration of the retention period, Copanyon shall terminate the processing of your personal data unless otherwise set by the relevant legislation.

## **29. Your Rights as Data Subject Regarding Your Personal Data Copanyon Processes**

### **29.1. Right of Confirmation**

You can obtain confirmation from Copanyon as to whether personal data concerning you is being processed.

### **29.2. Right of Access**

You can access your personal data processed by Copanyon.

### **29.3. Right to Rectification**

You can ask Copanyon to make corrections to incomplete or erroneous data and information related to your account and profile.

### **29.4. Right to Erasure (Right to Be Forgotten)**

You can request Copanyon to erase personal data. In most cases, Copanyon will erase it

unless otherwise required by law.

**To delete your personal data, you can:**

- Contact us by email at [support@Copanyon.com](mailto:support@Copanyon.com). We will respond to your request to delete your information within 30 days and notify you of the outcome.
- Delete specific items from your account (such as your payment method, etc.) by going to your account “Settings” page at <https://Copanyon.com/settings>.
- Delete your entire account by going to your account “Settings” page at <https://Copanyon.com/settings> and following the instructions for deleting your account.

**29.5. Right to Data Portability**

You can have your personal data transmitted directly from one controller to another where technically feasible, and when doing so does not adversely affect the rights and freedoms of others.

**29.6. Right to Object to Processing of Your Personal Data by Copanyon**

You can object to our processing of your personal data when the processing is related to the performance except in those cases where we process your data for the purposes of the legitimate interests pursued by us or by a third party vendors, and you believe that such interests are overridden by your interests or fundamental rights and freedoms. If you make a request with an objection to processing, we will no longer process the personal data unless we can demonstrate compelling legitimate grounds for the processing, such as to ensure your or other users’ privacy and to facilitate payment, tax and other legal obligations.

**29.7. Right to Withdraw Consent at any Time by Contacting Us**

After we at Copanyon receive a withdrawal request from you, we will process it in a timely manner, and we will no longer process your personal data unless otherwise required by law.

If one of the aforementioned reasons applies, please contact us, as instructed at the end of this Privacy Policy. We shall promptly ensure that the request is complied with immediately. These requests are free of charge.

If you believe that our use of your data violates your rights, you can lodge a complaint with the competent data protection authority.

Please note that when the processing of your personal data is carried out for direct marketing purposes, you have the right to object at any time to such processing without providing any justification and we will no longer process your data for such direct marketing purposes.

If we determine that your withdrawal of consent undermines Copanyon’s ability to provide you with the Services, we reserve the right to terminate your account at our sole discretion.

**30. Other Privacy Commitments**

**30.1. Cross-border Transfers**

We process your personal data both within the United States and outside the United States. Although countries where we process data may have different laws, we take measures to

ensure high standards of data privacy and compliance. Please note that some of countries may not offer the same level of protection for your personal data as your home jurisdiction, so it is advised that each User become familiar with the relevant laws and regulations applicable to such User.

### **30.2. Time for Reply and Reaction**

Copanyon endeavors to provide information on our actions taken at your request related to your rights specified above in a timely fashion. Please be advised that Copanyon's period of response may be more than 30-days depending on the volume of requests and other support related concerns that may be occurring at that time.

### **30.3. Security**

Copanyon implements technical and organizational measures to ensure that personal data is processed securely and protected against unauthorized access, unlawful processing, accidental loss, destruction, or damage. In the event Copanyon engages contractors, it shall do so under binding data processing agreements that govern and restrict their access to personal data.

### **30.4. Accessing Account to Provide Support**

In exceptional circumstances, such as required customer support, our support specialists may need to access your account. When such occasion occurs, they will be able to see the personal data submitted to your account, including your scheduled personal events, if your Google Calendar and Copanyon Calendar are connected.

We undertake to always ask for your permission to access your account before we start troubleshooting. Prior to granting us your permission, you might also consider editing your Google Calendar privacy settings with [Google Calendar Help Center](#) to hide your personal events from us.

Please note that if you do not want to grant your permission to access your account, it may affect the time and quality of the provision of customer support. Users may disconnect their Google Calendar from Copanyon at any time via their Google account settings.

### **30.5. Children's Privacy**

The privacy of children is one of our concerns. Copanyon Services are not intended for use by children under the age of 18 without the supervision of their parent or legal guardian. If you are under the age of 18 but not less than the age of 13, you will need to ask your parent/legal guardian to set up an account on the Copanyon Platform that you may use under their supervision.

We do not knowingly collect information from children under the age of 13 and discourage the use of Copanyon Services by children under this age. We encourage parents and legal guardians to monitor their children's Internet usage and help enforce our Privacy Policy by instructing their children never to provide information on the Copanyon Platform without their permission.

If you believe that there is a User under the age of 18, you may notify us by emailing [Support@copanyon.com](mailto:Support@copanyon.com), including details concerning the prospective underage user's account and profile name, date and time of the session or your interaction with them, and as much detail as possible for us to investigate such matters.

### **30.6. Breach Notifications**

If there is a personal data breach that is likely to result in a high risk of adversely affecting your rights as the data subject, we will inform you and the respective data protection agencies

as to the accidents without undue delay.

### **30.7. “DoNotTrack” Requests**

Copanyon does not share personal data with third parties for their direct marketing purposes. Also, our Services do not support “Do Not Track” requests.

### **30.8. California Privacy Rights**

In case you are a resident of California, you are entitled to certain rights over your personal data under the California Consumer Privacy Act of 2018. Specifically, as a resident of California, you have the right to:

- know about the categories and specific pieces of personal data that we have collected about you and access a copy of your personal data (“**Right to Know**”);
- have inaccurate personal data about you corrected (“**Right to Correction**”);
- request deletion of your personal data that we have collected (“**Right to Deletion**”);
- opt out of the sale of your personal data (“**Right to Opt-Out**”).

Please note that we may ask you and/or your agent to provide certain information to verify your and/or your agent’s identity and authorization before fulfilling the request. The information we request will depend on your prior interactions with us.

For more information about the personal data we collect and how we collect it, please refer to this Privacy Policy and Terms of Service.

Copanyon undertakes to treat you like everyone else and not discriminate against you if you choose to exercise your rights. To submit the request to exercise your rights, please send an email to [legal@Copanyon.com](mailto:legal@Copanyon.com).

### **30.9. Automated Decision-Making and Profiling**

As a part of the Copanyon Platform functionality, we process the personal data of our Hosts and students in a way that might be considered profiling.

Specifically, we may use machine-learning algorithms and AI applications that analyze various metric-based data and determine the Host’s ranking on the Copanyon Platform and their visibility to students. This is done to increase the matching efficiency between Patrons and Hosts on the Copanyon Platform and allow Hosts to connect with the optimal number of Patrons who best fit their interests and goals.

Please note that this type of processing is necessary to provide our Services. To know more about this process and the logic involved, please refer to our [Terms of Service](#).

If you want to request human intervention, express your point of view, or contest the decisions made by the algorithms, please send us an email to [legal@Copanyon.com](mailto:legal@Copanyon.com).

### **30.10. Sale of Personal Data**

We do not sell your personal data and the personal data of any minors under 16 years of age.

## **31. Data Privacy Framework Program**

### **(1) Participation in the Data Privacy Framework Program**

For personal data processed in the scope of this Privacy Policy, Copanyon, Inc. complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S.

DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce. Copanyon, Inc. has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. DPF Principles with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF. Copanyon, Inc. has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. DPF Principles with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this Privacy Policy and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern.

To learn more about the Data Privacy Framework (DPF) program, please visit <https://www.dataprivacyframework.gov/>.

To view our certification, please visit the Data Privacy Framework List available at <https://www.dataprivacyframework.gov/list>.

## **(2) DPF Principles-Related Complaints**

In compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF, Copanyon, Inc. commits to resolve DPF Principles-related complaints about our collection and use of your personal information. EU, UK, and Swiss individuals with complaints regarding our handling of personal data received in reliance on the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF should first contact Copanyon, Inc. at: [legal@Copanyon.com](mailto:legal@Copanyon.com).

## **(3) Dispute Resolution**

Where a DPF Principles-related complaint cannot be resolved through Copanyon, Inc.'s internal process as described above, in compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF, we commit to refer unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF to the Association of National Advertisers (ANA), an alternative dispute resolution provider based in the United States. If you do not receive timely acknowledgment of your DPF Principles-related complaint from us, or if we have not addressed your DPF Principles-related complaint to your satisfaction, please visit <https://www.ana.net/content/show/id/accountability-dpf-consumers> for more information or to file a complaint. The services of ANA are provided at no cost to you.

## **(4) Binding Arbitration**

You have the possibility, under certain conditions, to invoke binding arbitration for complaints regarding DPF compliance not resolved by any of the other DPF mechanisms (see DPF Principles-Related Complaints section and Dispute Resolution section).

For additional information, please visit Data Privacy Framework Annex I: Arbitral Model [https://www.dataprivacyframework.gov/s/article/ANNEX-I-introduction-dpf?tabset-3\\_5584=2](https://www.dataprivacyframework.gov/s/article/ANNEX-I-introduction-dpf?tabset-3_5584=2).

## **(5) US Oversight**

The Federal Trade Commission (FTC) has jurisdiction over Copanyon, Inc.'s compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF. Copanyon, Inc. is subject to the investigatory and enforcement powers of the FTC.

## **(6) Disclosure of Personal Information to Law Enforcement Officials**

Copanyon may disclose your personal information to the extent required by law or if we have a good-faith belief that we need to disclose it in order to comply with official investigations or legal proceedings (whether initiated by government or law enforcement officials or private parties, including to meet national security or law enforcement requirements).

## **(7) Liability in Cases of Onward Transfers to Third Parties**

In the context of an onward transfer, Copanyon LLC has responsibility for the processing of personal information we receive under the DPF Principles and subsequently transfer to a third party acting as an agent on our behalf. Copanyon LLC shall remain liable under the DPF Principles if our agent processes such personal information in a manner inconsistent with the DPF Principles, unless we prove that we are not responsible for the event giving rise to the damage.

## **32. Legal Matters**

Copanyon considers your use of the Services to be private. However, we may disclose your personal data stored in our databases in order to:

- (1) comply with the law or legal process served on us;
- (2) enforce and investigate potential violations of this Privacy Policy; including the use of the Services to participate in or facilitate activities that violate the law;
- (3) investigate potential fraudulent activities; or
- (4) protect the rights, property, or safety of Copanyon, its employees, customers or the public.

*We hope this Privacy Policy helps you understand how your personal data will be dealt with here at Copanyon. We will take care of your personal data, so you can use our Services and not be concerned about your privacy. Should you have any questions, e-mail us at [support@Copanyon.com](mailto:support@Copanyon.com).*

**Your Copanyon Team**