

Privacy Policy

Effective of May 19th 2020

We respect your privacy rights, care about Your Personal Data, and do Our best endeavors to protect it.

So we provide this Privacy Policy (can be also referred to as Policy) to explain You how we collect, manage, use and protect your Personal Data.

Please read carefully this Policy together with the Terms of Use and Cookie Policy.

Unless otherwise defined all of the terms in this Privacy Policy have the same meaning as in the Terms of Use.

About us

In this Privacy Policy references to SOAX, or to "We", "Our", "Ours" are to the Soax Ltd, a company incorporated in the United Kingdom (registration number 11828506), which registered address is 71-75 Shelton Street, London, Greater London, United Kingdom, WC2H 9JQ.

Soax Ltd is acting as a controller of the Soax Individual Users' Personal Data.

If You are a Corporate User, We will act on your behalf as Your data processor and will provide You with the amended Privacy statement together with the User Agreement at the time of your Account activation.

For the purpose of this clause the term "Individual User" shall mean any natural person, who visit our Site and/or use Our Services, and the term "Corporate User" shall mean any legal entity (organizations), which uses Our Services through the specially created for that purpose corporate Account.

If You have any questions related to your privacy, please contact us:

- email: legal@soax.com
- or use "Contact Us" form.

1. Your Personal Data

a) What categories of Your Personal Data We collect and process?

In course of using the Services, we will ask You to provide Us, or can collect from third parties, certain information that identifies You as a specific individual or can be used to contact or identify You (hereinafter referred as Personal Data).

Registration data

At the time You register Your Account, We ask You to provide Your email, password, country of Your residence and Your date of birth. Later after registration during logging in Your Account You will be also required to provide us Your name and occupation. In addition, in Your Account Profile Settings You can also fill in the field with Your telephone number.

In addition, We will ask You to provide Us with the information about Your age and country of Your residence, as We need this data to provide You with the Services. You will be also asked to give:

Payment data

Despite the payment method You choose, We do not store and cannot use Your credit card information or other payment details. Your credit card details are encrypted and securely stored by Your payment operator to enable Us to automatically bill You.

Information Collected from Users Automatically (log information)

We will automatically collect certain information from You whenever You access or interact with the Services. This information includes the browser and operating system You are using, the URL or advertisement that referred You to the Services, the search terms You entered into a search engine that led You to the Services, areas within the Services that You visited, and other information commonly shared when browsers communicate with websites. We can combine this automatically collected log information with other information We collect about You and build Your profile. We do this to improve the Services We offer You, to improve marketing, analytics, and Site functionality. The information We collect also includes the Internet Protocol ("IP") address or other unique device identifier ("Device Identifier") for any device (computer, mobile phone, tablet, etc.) used to access the Services. A Device Identifier is a number that is automatically assigned or connected to the device You use to access the Services, and Our servers identify Your device by its Device Identifier.

Request form information

When You use "Contact Us" form or other request forms, available on Our Site, to send Us Your request, We will ask You to give Us Your name, email address and (for Corporate Users) Your title and the name of company or institution You are representing. We need this information to provide You with the reply to such request. And if You are not the registered user on Our Site with the Account We will not use Your data for any other purposes unless We receive Your consent for that.

2. Children consent

We care about the privacy of children, who may use Our Services. We do not knowingly collect the Personal Data of the children under 16 years old without obtaining the consent for that from their parents or other persons, who are acting as the holders of parental responsibility.

For that purpose, You have to indicate Your age during the registration of Your Account, if You are younger than 16 years, You will be asked to provide Us the email of Your parents in order to obtain their consent and finish the registration procedure. The holder of parental responsibility will have to give the consent for certain purposes of Your Personal Data processing by ticking the boxes and agree with the Terms of Use and Privacy Policy.

Please also note that in such cases the holders of the parental responsibility by clicking the “I agree” button enter into contractual relations with Us (as Our Terms of Use constitute the legally binding agreement).

3. Withdrawing Your consent

If We collect and process Your Personal Data under Your consent as a legal basis, You can withdraw Your consent at any time. In order to do it You can use “Withdraw my consent” option in the Profile Settings of Your Account.

In case of withdrawal We will stop processing Your Personal Data subject to such consent. But in case We are required to retain your Personal Data for legal reasons your Data will be restricted from further processing and only retained for the term required by law.

Please note that withdrawing Your consent will not affect the lawfulness of any processing activities We conducted prior to Your withdrawal. And We still can process Your Personal Information on the legal grounds other than consent (for example, We need Your email to create Your account and provide You Our Services, the legal ground for such processing is the necessity for the performance of a contract between You and Us, if We stop processing Your email, we will not be able to provide You with Our Services).

If You want to stop using Our Services, You can delete Your Account with the help of “Delete” button in Your Profile Setting. But please note that We will remain Your Personal Data for a period of 180 days after such deletion in case You change Your mind and want to restore Your Account. You can restore Your Account only for that mentioned period of time and after that You’ll need to register Your Account again if You want to use Our Services.

4. Profiling

Profiling means gathering, automated processing and analyzing the information about the individual or groups of individuals in order to evaluate certain personal aspects about such individuals.

We use automatically collected log information as well as the other information You directly provide to Us to build Your profile.

We can use profiling to produce relevant communication and provide a better experience for Our Users. With the help of profiling We can target Our Services more effectively by getting and combining certain categories of Your Personal Data.

For example, We can group Our Users according to their occupation (students or teachers/instructors) and provide them with the relevant marketing and informational materials. Additionally, We may need such profiles for analytical and statistical purposes, in order to examine how Our Site and Services are used and to make certain improvements if needed.

We can use Your profile with Your Personal Data to set the targeting advertisement with the help of third party services (such as Facebook).

But remember that We can use Your Data for such purposes only if You have given Your consent for that. When You fill in special form for registration You can agree with such purpose of using Your Personal Data or reject it.

You can also withdraw Your consent at any time if You do not want Your Data to be used in any of the listed above ways.

5. Marketing

We can, with Your consent, process Your Personal Data to provide You with the information about Our activities and Our Services. In cases You gave Your consent on receiving marketing materials during the registration or just subscribe on newsletters about our Services on Our Site, We will send such marketing material on Your email (You can unsubscribe at any time).

Please pay attention that if You did not choose such option during the registration, We still can send letters on Your email, but only in cases when We are obliged under the law or under the contract to provide You with certain information (for example, when We change Our Terms of Use and Privacy Policy, make any software updates etc., We can inform You about it by sending You the email).

We can also use Your Personal Data (with You prior consent) to provide it to the third parties services in order to set the targeting marketing, if You provide Us during the registration with consent to process Your Personal Data for marketing purposes, which also include targeting marketing. It means, for example, that We may share with Facebook log information about Your visits of Our Site or other data from Your profile for the purpose of showing You Our adds on Facebook.

6. Your rights

You have the following privacy rights related to Your Personal Data processing:

- Right to be informed

This right means that You can get the information from Us of how We use Your Personal Data;

- Right of access

This right entitles You to verify the Personal Data held by Us, get informed on the ways it is used and the purposes of the processing. To gain access to Your Personal Data, you would need to open Profile Settings of your Account;

- Right to rectification

You can edit Your Personal Data in Your Account on the Profile Details page, but please pay Your attention that certain categories of Your Personal Data (such as the country of Your residence and Your telephone number) may be not editable in Your Account settings. If You want to edit such categories of Your Personal Data You will be offered to delete Your Account, so that You can create the new Account with the other data. You are also not able to change Your email as it is the main mean of Your Account individualization and Our communication with You. If You want to change Your email details You'll have to delete Your Account and pass the new registration with the other email;

- Right to erasure, "right to be forgotten"

This right means that You can request the removal of Your Personal Data, We hold and process, but please pay attention that We can delete Your Personal Information only if there is no legal or regulatory obligation to retain it;

- Right to restriction of processing

This right means that You can ask Us to stop processing Your Personal Data, but please kindly note, that there are certain categories of data that We need to provide You the Services, and if We stop processing it, You will not be able to use SOAX.

- Right to object and right to withdraw consent

You can refuse receiving the marketing materials on Your email, for that purpose You can use the “unsubscribe button” in the email communication. You can also withdraw Your consent on Personal Data processing but only in cases when the legal basis for Your data processing is Your consent. You can find out more in the clause “Withdrawing Your consent” of that Privacy Policy;

- Right of data portability.

This right means that You can ask Us to transmit your Personal Data to the other data controller.

All of these privacy rights can be easily exercised in the Profile Settings of Your User Account or by sending Us the request through the “Contact Us” form.

In addition, You have the right to make a complaint to the supervisory authority (data protection authority) in the Member State of Your habitual residence, place of work or place where Your Data is being processed if You think that there are any privacy infringements concerning You. More information and contact details of the data protection authorities in the European Union (EU) and the European Free Trade Area (EFTA) can be found [here](#).

7. How we use and share Your Personal Data

We only disclose Your Personal Data to the third parties when We are obliged by law or other applicable legislation.

We will share information with government agencies as required by law, including without limitation, in connection with reporting earnings. We cooperate with government and law enforcement officials and private parties to enforce and comply with the law. We will disclose information about You to government or law enforcement officials if it is necessary or appropriate to respond to claims and legal process, at the request of governmental authorities or other third parties conducting an investigation, to protect the property and rights of Us or a third party, to protect the safety of the public or any person, or to prevent or stop activity We may consider to be illegal, fraudulent or unethical. We are entitled to share Your Personal Data for such purposes under the clause 6.1.c) of GDPR (General Data Protection Regulation).

We will also disclose Your Personal Data (but after obtaining Your consent for that), such as Your log data and emails to the third parties, which provide the service of setting up targeting ads (such as Facebook) in marketing purposes.

Moreover, We will share some categories of Your Personal Data (which will include Your name and email) with the marketing automation services (such as MailChimp), when We make automated mailing on the emails of Our Users.

All Your Personal Data, which is being processed by Us is stored on the territory of the European Union. But please note, that if You have given Your consent to receive marketing materials and/or to process Your Personal Data in order to build Your profile for marketing purposes

If We need to transfer Your Personal Data outside the European Union to the third parties other than mentioned in this clause You will be informed about that and We will ask Your consent in case of such transfer. In all such cases Your Personal Data can only be transferred to the companies or organizations outside the EU, which provide the adequate level of data protection.

8. How We store Your Personal Data

We care about Your privacy and take commercially reasonable steps to help protect and secure the information We collect and store about You, such as data encryption and pseudonymization. All access to the Site is encrypted using industry-standard transport layer security technology (TLS). When You enter Your information, We encrypt the transmission of that information using secure socket layer technology (SSL). We also use HTTP strict transport security to add an additional layer of protection for Our users.

Additionally, according to the storage limitation principle of data processing We will store Your Personal Data only as long as it is required to fulfil the purposes set out on this Privacy Policy or until You withdraw Your consent (if We process the data under Your consent), or decide to stop using our Services and delete Your Account.

However, if We are required by law or any mandatory regulation to retain Your Personal Data longer or if We need Personal Data to assert or defend against legal claims, We will retain Your Personal Data until the end of the relevant retention period or until the claims in question have been settled.

CHANGES TO THIS POLICY

We may update this Privacy Policy in future, if needed to provide the compliance with data protection laws and regulations. In such cases, We will send You a letter of notification on Your email prior to the change becoming effective. We will always use Your Personal Data in accordance with GDPR requirements and in a manner consistent with the Privacy Policy in effect at the time You submitted the information, unless You consent to the new or revised policy.

Contact Us

If You have any questions related to your privacy, please contact us:

- email: legal@soax.com
- or use Contact Us form