**Privacy Policy**

This Privacy Policy describes how we collect, use, process, and disclose your data , including personal information, in conjunction with your access to and use of Course.tours and its Payment Services.

When this policy mentions «Course.tours», «we», «us», or «our», it refers to the Course.tours company that is responsible for your information under this Privacy Policy (the «Data Controller»).

This Privacy Policy also applies to the Payment Services provided to you by Course.tours pursuant to the Payments Terms of Service («Payments Terms»).

Please see Section 10 for contact details of the Data Controller.

**1. Information we collect**

There are three general categories of information we collect.

**1.1 Information You Give to Us.**

**1.1.1 Information that is necessary for the use of Course.tours .**

We ask for and collect the following personal information about you when you use Course.tours. This information is necessary for the adequate performance of the contract between you and us, and to allow us to comply with our legal obligations. Without it, we may not be able to provide you with all requested services.

* **Account Information.** When you sign up for a Course.tours Account, we require certain information such as your first name, last name, email address, and date of birth.
* **Profile and Listing Information.**
To use certain features of Course.tours, we may ask you to provide additional information, which may include your home address, phone number, and a profile picture.
* **Identity Verification Information.**
To help create and maintain a trusted environment, we may collect identity verification information (such as images of your government issued ID, passport, national ID card, or driver’s license, as permitted by applicable laws) or other authentication information.
* **Payment Information.**
To use certain features of Course.tours, we may require you to provide certain financial information (like your bank account or credit card information) in order to facilitate the processing of payments.
* **Communications with Course.tours .**
When you communicate with Course.tours, we collect information about your communication and any information you choose to provide.

**1.1.2 Information you choose to give us.**

You may choose to provide us with additional personal information in order to obtain a better user experience when using Course.tours. This additional information will be processed based on your consent.

* **Additional Profile Information.**
You may choose to provide additional information as part of your Course.tours profile (such as gender, preferred language(s), city, and a personal description). Some of this information as indicated in your Account settings is part of your public profile page, and will be publicly visible to others.
* **Other Information.**
You may otherwise choose to provide us with information when you fill in a form, conduct a search, update or add information to your Course.tours Account, respond to surveys, post to community forums, participate in promotions, or use other features of Course.tours.

**1.1.3 Information that is necessary for the use of the Payment Services.**

The Payments Data Controller needs to collect the following information, as it is necessary for the adequate performance of the contract with you and to comply with applicable laws (such as anti-money laundering regulations). Without it, you will not be able to use Payment Services:

* **Payment Information.**
When you use Payment Services, the Payments Data Controller requires certain financial information (like your bank account or credit card information) in order to process payments and comply with applicable laws.
* **Identity Verification and Other Information.**
The Payments Data Controller may require identity verification information (such as images of your government issued ID, passport, national ID card, or driver’s license) or other authentication information, your date of birth, your home address, email address, phone number and other information in order to verify your identity, provide the Payment Services to you, and to comply with applicable laws.

**1.2.Information We Automatically Collect from Your Use of Course.tours and Payment Services.**

When you use the Course.tours site and the Payment Services, we automatically collect data, including personal information, about the services you use and how you use them. This information is necessary for the adequate performance of the contract between you and us, to enable us to comply with legal obligations and given our legitimate interest in being able to provide and improve the functionalities of Course.tours and Payment Services.

* **Geo-location Information.**
When you use certain features of Course.tours, we may collect information about your precise or approximate location as determined by data such as your IP address or mobile device’s GPS to offer you an improved user experience. Most mobile devices allow you to control or disable the use of location services for applications in the device’s settings menu. Course.tours may also collect this information even when you are not using the app if this connection is enabled through your settings or device permissions.
* **Usage Information.**
We collect information about your interactions with Course.tours such as the pages or content you view, your searches, bookings you have made, and other actions on the Course.tours site.
* **Log Data and Device Information.**
We automatically collect log data and device information when you access and use Course.tours, even if you have not created a Course.tours Account or logged in. That information includes, among other things: details about how you’ve used Course.tours (including if you clicked on links to third party applications), IP address, access dates and times, hardware and software information, device information, device event information, unique identifiers, crash data, cookie data, and the pages you’ve viewed or engaged with before or after using Course.tours.
* **Cookies and Similar Technologies.**
We use cookies and other similar technologies, such as web beacons, pixels, and mobile identifiers. We may also allow our business partners to use these tracking technologies on Course.tours, or engage others to track your behavior on our behalf. While you may disable the usage of cookies through your browser settings, the Course.tours currently does not respond to a «Do Not Track» signal in the HTTP header from your browser or mobile application due to lack of standardization regarding how that signal should be interpreted.
* **Payment Transaction Information.**
Course.tours collects information related to your payment transactions through Course.tours, including the payment method used, date and time, payment amount, payment method expiration date and billing postcode, PayPal email address, IBAN information, your billing address and other related transaction details. This information is necessary for the adequate performance of the contract between you and Course.tours and to allow the provision of the Payment Services.

**1.3. Information We Collect from Third Parties.**

Course.tours may collect information, including personal information, that others provide about you when they use Course.tours and the Payment Services, or obtain information from other sources and combine that with information we collect through Course.tours and the Payment Services. We do not control, supervise, or answer for how the third parties providing your information process your personal data, and any information request regarding the disclosure of your personal information to us should be directed to such third parties.

* **Your References.**
If someone has written a reference, it will be published on the Course.tours public profile page.
* **Background Information.**
For Members in the United States, to the extent permitted by applicable laws, Course.tours may obtain reports from public records of criminal convictions or sex offender registrations. For Members outside of the United States, to the extent permitted by applicable laws and with your consent where required, Course.tours may obtain the local version of police, background or registered sex offender checks. We may use your information, including your full name and date of birth, to obtain such reports.
* **Other Sources.**
To the extent permitted by applicable law, we may receive additional information about you, such as demographic data or fraud detection information, from third party service providers and/or partners, and combine it with information we have about you. For example, we may receive background check results (with your consent where required) or fraud warnings from service providers like identity verification services for our fraud prevention and risk assessment efforts. We may receive information about you and your activities on and off Course.tours through partnerships, or about your experiences and interactions from our partner ad networks.

**2. How we use information we collect**

We use, store, and process data , including personal information, about you to provide, understand, improve, and develop Course.tours, create and maintain a trusted and safer environment and comply with our legal obligations.

**2.1. Provide, Improve, and Develop the Course.tours Platform.**

* Enable you to access and use the Course.tours site.
* Enable you to communicate with other Members.
* Operate, protect, improve, and optimize the Course.tours experience, such as by performing analytics and conducting research.
* Provide customer service.
* Send you service or support messages, updates, security alerts, and account notifications.
* If you provide us with your contacts’ information, we may process this information: (i) to facilitate your referral invitations, (ii) send your requests for references, (iii) for fraud detection and prevention, and (iv) for any purpose you authorize at the time of collection.
* To operate, protect, improve, and optimize the Course.tours experience, and personalize and customize your experience (such as making Listing school suggestions or ranking search results), we conduct profiling based on your interactions with the LinguaTrip.com site, your search and booking history, your profile information and preferences, and other content you submit to Course.tours.

We process this information given our legitimate interest in improving Course.tours and our Members’ experience with it, and where it is necessary for the adequate performance of the contract with you.

**2.2. Create and Maintain a Trusted and Safer Environment.**

* Detect and prevent fraud, spam, abuse, security incidents, and other harmful activity.
* Conduct security investigations and risk assessments.
* Verify or authenticate information or identifications provided by you (such as to verify your Accommodation address or compare your identification photo to another photo you provide).
* Conduct checks against databases and other information sources, including background or police checks, to the extent permitted by applicable laws and with your consent where required.
* Comply with our legal obligations.
* Resolve any disputes with any of our Members and enforce our agreements with third parties.
* Enforce our Terms of Service and other policies.
* In connection with the activities above, we may conduct profiling based on your interactions with Course.tours, your profile information and other content you submit to Course.tours, and information obtained from third parties. In limited cases, automated processes may restrict or suspend access to Course.tours if such processes detect a Member or activity that we think poses a safety or other risk to Course.tours, other Members, or third parties.

We process this information given our legitimate interest in protecting Course.tours, to measure the adequate performance of our contract with you, and to comply with applicable laws.

**2.3. Provide, Personalize, Measure, and Improve our Advertising and Marketing.**

* Send you promotional messages, marketing, advertising, and other information that may be of interest to you based on your preferences (including information about Course.tours or partner campaigns and services) and social media advertising through social media platforms such as Facebook or Google).
* Personalize, measure, and improve our advertising.
* Administer referral programs, rewards, surveys, sweepstakes, contests, or other promotional activities or events sponsored or managed by Course.tours or its third party partners.
* Conduct profiling on your characteristics and preferences (based on the information you provide to us, your interactions with Course.tours, information obtained from third parties, and your search and booking history) to send you promotional messages, marketing, advertising and other information that we think may be of interest to you.

We will process your personal information for the purposes listed in this section given our legitimate interest in undertaking marketing activities to offer you products or services that may be of your interest. You can opt-out of receiving marketing communications from us by following the unsubscribe instructions included in our marketing communications or changing your notification settings within your Course.tours Account.

**2.4. How the Payments Data Controller uses the Information Collected.**

* Enable you to access and use the Payment Services.
* Detect and prevent fraud, abuse, security incidents, and other harmful activity.
* Conduct security investigations and risk assessments.
* Conduct checks against databases and other information sources.
* Comply with legal obligations (such as anti-money laundering regulations).
* Enforce the Payment Terms and other payment policies.
* With your consent, send you promotional messages, marketing, advertising, and other information that may be of interest to you based on your preferences.

The Payments Data Controller processes this information given its legitimate interest in improving the Payment Services and its users’ experience with it, and where it is necessary for the adequate performance of the contract with you and to comply with applicable laws.

**3. Sharing & disclosure**

**3.1. With Your Consent.**

Where you have provided consent, we share your information, including personal information, as described at the time of consent, such as when you authorize a third party application or website to access your Course.tours Account or when you participate in promotional activities conducted by Course.tours partners or third parties.

**3.2. Sharing between Members.**

To help facilitate bookings or other interactions between Members, we may need to share certain information, including personal information, with other Members, as it is necessary for the adequate performance of the contract between you and us.
We don’t share your billing and payout information with other Members.

**3.3. Profiles, Listings, and other Public Information.**

The Course.tours site lets you publish information, including personal information, that is visible to the general public. For example:

* Parts of your public profile page, such as your first name, your description, and name of language schools you’ve visited, are publicly visible to others.
* Pages of schools are visible to all visitors and contain information about the approximate location or reviews (with your consent).
* Any content sent to communities, forums, blogs or social networks via Course.tours or through such functions is available to all users.

Based on our legitimate interest to promote Course.tours we may display parts of Course.tours using technologies such as widgets or APIs. If your Listings of schools are displayed on a partner’s site, information from your public profile page may also be displayed.

Information you share publicly on Course.tours may be indexed through third party search engines. In some cases, you may opt-out of this feature in your Account settings. If you change your settings or your public-facing content, these search engines may not update their databases. We do not control the practices of third party search engines, and they may use caches containing your outdated information.

**3.4. Compliance with Law, Responding to Legal Requests, Preventing Harm and Protection of our Rights.**

Course.tours may disclose your information, including personal information, to courts, law enforcement or governmental authorities, or authorized third parties, if and to the extent we are required or permitted to do so by law or if such disclosure is reasonably necessary: (i) to comply with our legal obligations, (ii) to comply with legal process and to respond to claims asserted against Course.tours, (iii) to respond to verified requests relating to a criminal investigation or alleged or suspected illegal activity or any other activity that may expose us, you, or any other of our users to legal liability, (iv) to enforce and administer our Terms of Service, the Payment Terms or other agreements with Members, or (v) to protect the rights, property or personal safety of Course.tours, its employees, its Members, or members of the public.

These disclosures may be necessary to comply with our legal obligations, for the protection of your or another person's vital interests or for the purposes of our or a third party’s legitimate interest in keeping Course.tours secure, preventing harm or crime, enforcing or defending legal rights, or preventing damage.

Where appropriate, we may notify Members about legal requests unless: (i) providing notice is prohibited by the legal process itself, by court order we receive, or by applicable law, or (ii) we believe that providing notice would be futile, ineffective, create a risk of injury or bodily harm to an individual or group, or create or increase a risk of fraud upon Course.tours’s property, its Members and Course.tours. In instances where we comply with legal requests without notice for these reasons, we will attempt to notify that Member about the request after the fact where appropriate and where we determine in good faith that we are no longer prevented from doing so.

**3.5. Service Providers.**

Course.tours uses a variety of third party service providers to help us provide services related to the Payment Services. Service providers may be located inside or outside of the European Economic Area (**«EEA»**). In particular, our service providers are based in MENA, Europe, India, Asia Pacific and North and South America.

For example, service providers may help us: (i) verify your identity or authenticate your identification documents, (ii) check information against public databases, (iii) conduct background or police checks, fraud prevention, and risk assessment, (iv) perform product development, maintenance and debugging, (v) allow the provision of Course.tours through third party platforms and software tools (e.g. through the integration with our APIs), or (vi) provide customer service, advertising, or payments services. These providers have limited access to your information to perform these tasks on our behalf, and are contractually bound to protect and to use it only for the purposes for which it was disclosed and consistent with this Privacy Policy.

Course.tours will need to share your information, including personal information, in order to ensure the adequate performance of our contract with you.

**3.6. Corporate Affiliates.**

To enable or support us in providing Course.tours, we may share your information, including personal information, within our corporate family of companies (both financial and non-financial entities) that are related by common ownership or control.

* **Sharing with Course.tours.**
Even if your Country of Residence is not the United States, your information may be shared with DBR TEAM FZ-LLC, which provides the technical infrastructure for Course.tours, product development and maintenance, customer support, trust and safety. The data sharing is necessary for the performance of the contract between you and us and is based on our legitimate interests in providing Course.tours globally.
* **Sharing with Payments Services.**
In order to facilitate payments on or through the Course.tours site, certain information as described above in Section 1.1.3, may be shared with the relevant Payments Services entity. The data sharing is necessary for the performance of the contract between you and us.

Additionally, we share your information, including personal information, with our corporate affiliates in order to support and integrate, promote, and to improve Course.tours and our affiliates’ services.

**3.7. Social Media Platforms.**

Where permissible according to applicable law, we may use certain limited personal information about you, such as your email address, to hash it and to share it with social media platforms, such as Facebook or Google, to generate leads, drive traffic to our websites or otherwise promote our products and services or Course.tours. These processing activities are based on our legitimate interest in undertaking marketing activities to offer you products or services that may be of interest to you.

The social media platforms with which we may share your personal data are not controlled or supervised by Course.tours. Therefore, any questions regarding how your social media platform service provider processes your personal data should be directed to said provider.

Please note that you may, at any time ask Course.tours to cease processing your data for these direct marketing purposes by sending an e-mail to info@course.tours .

**3.8. Business Transfers.**

If Course.tours undertakes or is involved in any merger, acquisition, reorganization, sale of assets, bankruptcy, or insolvency event, then we may sell, transfer or share some or all of our assets, including your information in connection with such transaction or in contemplation of such transaction (e.g., due diligence). In this event, we will notify you before your personal information is transferred and becomes subject to a different privacy policy.

**3.9. Aggregated Data.**

We may also share aggregated information (information about our users that we combine so that it no longer identifies or references an individual user) and other anonymized information for regulatory compliance, industry and market analysis, demographic profiling, marketing and advertising, and other business purposes.

**4. Other important information**

**4.1. Analyzing your Communications.**

We may review, scan, or analyze your communications on Course.tours for fraud prevention, risk assessment, regulatory compliance, investigation, product development, research, and customer support purposes. For example, as part of our fraud prevention efforts, we scan and analyze messages to mask contact information and references to other websites. In some cases, we may also scan, review, or analyze messages to debug, improve, and expand product offerings. We use automated methods where reasonably possible. However, occasionally we may need to manually review some communications, such as for fraud investigations and customer support, or to assess and improve the functionality of these automated tools. We will not review, scan, or analyze your communications to send third party marketing messages to you, and we will not sell reviews or analyses of these communications.

These activities are carried out based on Course.tours's legitimate interest in ensuring compliance with applicable laws and our Terms, preventing fraud, promoting safety, and improving and ensuring the adequate performance of our services.

**4.2. Linking Third Party Accounts.**

You may link your Course.tours Account with your account at a third party social networking service. When you create this link:

* some of the information you provide to us from the linking of your accounts may be published on your Course.tours Account profile;
* a link to your public profile on that third party social networking service may be included in your Course.tours public profile;
* the information you provide to us from the linking of your accounts may be stored, processed and transmitted for fraud prevention and risk assessment purposes;
* the publication and display of information that you provide to Course.tours through this linkage is subject to your settings and authorizations on Course.tours and the third party site.

We only collect your information from linked third party accounts to the extent necessary to ensure the adequate performance of our contract with you, or to ensure that we comply with applicable laws, or with your consent.

**4.3. Google Maps/Earth.**

Parts of the Course.tours use Google Maps/Earth services, including the Google Maps API(s). Use of Google Maps/Earth is subject to [Google Maps/Earth Additional Terms of Use](http://www.google.com/intl/en_us/help/terms_maps.html) and the [Google Privacy Policy](http://www.google.com/privacy.html).

**5. Third party partners & integrations**

Course.tours may contain links to third party websites or services, such as third party integrations, co-branded services, or third party-branded services (**«Third Party Partners»**). Course.tours doesn’t own or control these Third Party Partners and when you interact with them, you may be providing information directly to the Third Party Partner, Course.tours, or both. These Third Party Partners will have their own rules about the collection, use, and disclosure of information. We encourage you to review the privacy policies of the other websites you visit.

**6. Your rights**

You may exercise any of the rights described in this section before your applicable Course.tours Data Controller and Payments Data Controller by sending an email to info@course.tours . Please note that we may ask you to verify your identity before taking further action on your request.

**6.1. Managing Your Information.**

You may access and update some of your information through your Account settings. You are responsible for keeping your personal information up-to-date.

**6.2. Rectification of Inaccurate or Incomplete Information.**

You have the right to ask us to correct inaccurate or incomplete personal information concerning you in your Course.tours Account.

**6.3. Data Access and Portability.**

In some jurisdictions, applicable law may entitle you to request copies of your personal information held by us. You may also be entitled to request copies of personal information that you have provided to us in a structured, commonly used, and machine-readable format and/or request us to transmit this information to another service provider (where technically feasible).

**6.4. Data Retention and Erasure.**

We generally retain your personal information for as long as is necessary for the performance of the contract between you and us and to comply with our legal obligations. If you no longer want us to use your information to provide Course.tours to you, you can request that we erase your personal information and close your Course.tours Account. Please note that if you request the erasure of your personal information:

* We may retain some of your personal information as necessary for our legitimate business interests, such as fraud detection and prevention and enhancing safety. For example, if we suspend a Course.tours Account for fraud or safety reasons, we may retain certain information from that Course.tours Account to prevent that Member from opening a new Course.tours Account in the future.
* We may retain and use your personal information to the extent necessary to comply with our legal obligations. For example, Course.tours may keep some of your information for tax, legal reporting and auditing obligations.
* Information you have shared with others (e.g., Reviews, forum postings) may continue to be publicly visible on Course.tours, even after your Course.tours Account is cancelled.
* Because we maintain Course.tours to protect from accidental or malicious loss and destruction, residual copies of your personal information may not be removed from our backup systems for a limited period of time.

**6.5. Withdrawing Consent and Restriction of Processing.**

Where you have provided your consent to the processing of your personal information by Course.tours you may withdraw your consent at any time by changing your Account settings or by sending a communication to Course.tours specifying which consent you are withdrawing.

Please note that the withdrawal of your consent does not affect the lawfulness of any processing activities based on such consent before its withdrawal. Additionally, in some jurisdictions, applicable law may give you the right to limit the ways in which we use your personal information, in particular where (i) you contest the accuracy of your personal information; (ii) the processing is unlawful and you oppose the erasure of your personal information; (iii) we no longer need your personal information for the purposes of processing, but you require the information for the establishment, exercise or defence of legal claims; or (iv) you have objected to the processing pursuant to Section 6.6 and pending the verification whether the legitimate grounds of Course.tours override your own.

**6.6. Objection to Processing.**

In some jurisdictions, applicable law may entitle you to require Course.tours not to process your personal information for certain specific purposes (including profiling) where such processing is based on legitimate interest. If you object to such processing, Course.tours will no longer process your personal information for these purposes unless we can demonstrate compelling legitimate grounds for such processing or such processing is required for the establishment, exercise or defense of legal claims.

Where your personal information is processed for direct marketing purposes, you may at any time ask Course.tours to cease processing your data for these direct marketing purposes by sending an e-mail to info@course.tours .

**6.7. Lodging Complaints.**

You have the right to lodge complaints about the data processing activities carried out by Course.tours before the competent data protection authorities.

**7. Operating globally**

To facilitate our global operations, Course.tours may transfer, store, and process your information within our services or with service providers based in MENA, Europe, India, Asia Pacific and North and South America. Laws in these countries may differ from the laws applicable to your Country of Residence. For example, information collected within the EEA may be transferred, stored, and processed outside of the EEA for the purposes described in this Privacy Policy. Where we transfer, store, and process your personal information outside of the EEA, we have ensured that appropriate safeguards are in place to ensure an adequate level of data protection.

**7.1. EU-US & Swiss-US Privacy Shield.**

Course.tours complies with the EU-US Privacy Shield Framework and the Swiss-US Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States, respectively. Course.tours has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this Privacy Policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, please visit <https://www.privacyshield.gov/>.

Under the Privacy Shield Framework, Course.tours is subject to the authority of the Federal Trade Commission. If you have any questions or concerns relating to our Privacy Shield certification, contact us by email: info@course.tours .

If we are not able to resolve your concern, you may also contact your European Data Protection Authority or Commission or seek assistance from our designated Privacy Shield independent recourse mechanism, [JAMS](https://www.jamsadr.com/). In certain circumstances, you may also have the right to pursue binding arbitration through the Privacy Shield Framework, as described in [Annex I to the Privacy Shield Principles.](https://www.privacyshield.gov/article?id=ANNEX-I-introduction)

If we have received your personal information under the Privacy Shield and subsequently transfer it to a third party service provider for processing as described in this Privacy Policy, we will remain responsible if these providers process your personal information in a manner inconsistent with the Privacy Shield Principles, except where we can establish that LinguaTrip.com was not responsible for the violation.

**7.2.Other Means to Ensure an Adequate Level of Data Protection.**

We will provide further information on the means to ensure an adequate level of data protection on request.

**8. Security**

We are continuously implementing and updating administrative, technical, and physical security measures to help protect your information against unauthorized access, loss, destruction, or alteration. Some of the safeguards we use to protect your information are firewalls and data encryption, and information access controls. If you know or have reason to believe that your Course.tours Account credentials have been lost, stolen, misappropriated, or otherwise compromised or in case of any actual or suspected unauthorized use of your Course.tours Account, please contact us following the instructions in the Contact Us section below.

**9. Changes to this privacy policy**

Course.tours reserves the right to modify this Privacy Policy at any time in accordance with this provision.

If we make changes to this Privacy Policy, we will post the revised Privacy Policy on the Course.tours site and update the «Last Updated» date at the top of this Privacy Policy.

If you disagree with the revised Privacy Policy, you may cancel your Account. If you do not cancel your Account before the date the revised Privacy Policy becomes effective, your continued access to or use of LinguaTrip.com will be subject to the revised Privacy Policy.

**10. Contact us**

If you have any questions or complaints about this Privacy Policy or LinguaTrip.com, you may email us at: info@course.tours or contact us at: DBR TEAM FZ-LLC registered at B5-301-C B5-301-C ,Business Center 05, RAKEZ Business Zone-FZ RAK, United Arab Emirates