

# PRIVACY POLICY

(Personal Data Processing Policy)  
Effective as of: February 18, 2026

This Privacy Policy ("Policy") explains how Sole Proprietor Olena Chepurna, registered as an Individual Entrepreneur (FOP), Ukraine, Registration No. 3149508142 (the "Data Controller"), collects, uses, processes, stores, and protects personal data in connection with:

- provision of individual online English lessons;
- operation of <https://englishwithmovies.com> (the "Website");
- communication with students and prospective students.

By using the Website or Services, you acknowledge that you have read and understood this Policy.

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## 1. Data Controller Information

Data Controller: Sole Proprietor Olena Chepurna  
Registration No.: 3149508142  
Country: Ukraine  
Email: [englishwithmovies.info@gmail.com](mailto:englishwithmovies.info@gmail.com)  
Website: <https://englishwithmovies.com>

The Data Controller determines the purposes and means of processing personal data.

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## 2. Definitions

Personal Data – any information relating to an identified or identifiable natural person.

Data Subject – Website visitor, student, or prospective student.

Processing – any operation performed on Personal Data.

Services – individual online English lessons, consultations, and related educational services.

Payment Providers – Stripe, Wise, PayPal, banks, and other authorized financial institutions.

Cookies – small data files stored on your device.

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## **3. Categories of Personal Data**

The Data Controller collects only data necessary for legitimate business and educational purposes.

### **3.1 Data You Provide**

- Name
- Email address
- Phone number or messenger username (optional)
- Country and time zone
- Information shared voluntarily (learning goals, level, preferences)

### **3.2 Payment Data**

- Payment amount
- Currency
- Transaction ID
- Payment status

The Data Controller does NOT collect or store full card numbers, CVC codes, or sensitive financial credentials. These are processed exclusively by Payment Providers.

### **3.3 Technical Data**

- IP address
- Browser and device information
- Cookies
- Basic analytics data (if enabled)

### **3.4 Lesson Recordings**

Lessons are not recorded by default. Recording occurs only with prior explicit consent.

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## **4. Purposes of Processing**

Personal Data is processed for:

- providing educational services
- scheduling and communication
- payment and refund processing
- compliance with tax/accounting obligations
- website functionality and analytics
- fraud prevention and security

- service-related notifications
  - marketing communications (only with explicit consent)
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## **5. Legal Bases for Processing (GDPR Art. 6)**

Processing is based on:

- Contract performance
  - Legitimate interests
  - Legal obligations
  - Consent (where applicable)
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## **6. Data Retention**

Personal Data is retained:

- for the duration of service provision;
- for legally required accounting periods;
- until consent is withdrawn (where applicable).

After expiration of retention periods, data is deleted or anonymized where feasible.

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## **7. Data Sharing**

Personal Data is never sold.

Data may be shared only with:

- Payment Providers
- Video communication platforms (Zoom, Google Meet)
- Accounting and legal service providers
- Government authorities when legally required

Only the minimum necessary data is transferred.

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## **8. International Data Transfers**

Personal Data may be processed outside Ukraine or your country of residence when using international service providers.

Where required, safeguards may include:

- Standard Contractual Clauses (SCCs)
  - GDPR-compliant mechanisms
  - Encryption and secure data processing standards
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## **9. Data Security**

The Data Controller implements reasonable technical and organizational measures including:

- secure payment processing
- password-protected systems
- limited access controls
- encrypted communication where available

However, no system can guarantee absolute security.

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## **10. Cookies & Tracking**

The Website may use:

- essential cookies
- analytics cookies
- marketing cookies (if enabled)

Users may manage cookie preferences via browser settings and the Website's Cookie Banner.

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## **11. Your Rights**

Depending on jurisdiction, you may have the right to:

- access your Personal Data
- request correction
- request deletion
- restrict processing
- object to processing
- withdraw consent
- request data portability

Requests may be submitted to:  
englishwithmovies.info@gmail.com

The Data Controller may verify identity before fulfilling requests.

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## **12. GDPR (EU & EEA)**

If located in the EU/EEA:

- Processing complies with Regulation (EU) 2016/679 (GDPR).
- You have rights under Articles 15-22 GDPR.
- You may lodge a complaint with your local Data Protection Authority.

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## **13. UK GDPR**

If located in the United Kingdom:

- Processing complies with UK GDPR and Data Protection Act 2018.
- You may contact the Information Commissioner's Office (ICO).

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## **14. United States Privacy Rights**

For US residents:

- Payment data is processed via PCI-DSS-compliant providers.
- Where applicable (e.g., California), you may request access or deletion of personal data.
- Personal data is not sold.

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## **15. Children's Privacy**

Services are intended for individuals 18 years or older.

No Personal Data of minors is knowingly collected.

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## **16. Third-Party Websites**

The Website may link to third-party platforms.

The Data Controller is not responsible for their privacy practices.

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## **17. Policy Updates**

This Policy may be updated periodically.  
The current version is published on the Website with its effective date.

Continued use of the Website constitutes acceptance of the updated Policy.

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## **18. Contact**

Privacy inquiries:  
englishwithmovies.info@gmail.com

Data Controller:  
Sole Proprietor Olena Chepurna  
Ukraine, Registration No. 3149508142