

PRIVACY POLICY

1. INTRODUCTION

Cobaye Languages (“Platform”) is committed to protecting your privacy and personal data. This Privacy Policy explains how we collect, use, store and share your data in accordance with Brazilian Law 13,709/2018 (LGPD) and Google’s policies, including the Google API Services User Data Policy. By using our services, you agree to the practices described herein.

Last updated: June 1, 2025.

2. DATA WE COLLECT

2.1 Data provided by the User

- Full name, e-mail, phone number and country.
- Payment data (processed by third-party providers).
- User-generated content: messages, files, audio, video and lesson responses.

2.2 Data collected automatically

- Usage data: sessions, pages visited, clicks, language preferences.
- Device identifiers, operating system and browser.
- IP address, date and time of access.
- Cookies and similar technologies.

2.3 Data from Google integrations (Google Calendar)

When the User chooses to link a Google account to manage classes via Google Calendar, we collect:

- List of calendars selected by the User (scope `https://www.googleapis.com/auth/calendar`)
- Class-related events (date, time, description).

3. HOW WE USE YOUR DATA

- Create and manage your account.
- Process payments and billing.
- Schedule, remind and manage classes (including optional sync with Google Calendar).
- Improve products, personalize content and generate learning statistics.

- Send support, service updates and marketing communications (opt-out available).
- Comply with legal obligations and prevent fraud.

Use and transfer of information received from Google APIs will adhere to the Google API Services User Data Policy, including the Limited Use requirements. We do not use Google Calendar data for advertising purposes nor share it outside the cases described in this Policy.

4. LEGAL BASIS (LGPD)

- Contract performance: delivery of educational services.
- Consent: marketing e-mails and Google Calendar integration.
- Legal or regulatory obligation.
- Legitimate interest: platform security and product improvement (subject to balancing test).

5. DATA SHARING

We share data only with:

- Payment processors (Stripe, PayPal or local acquirer).
- Hosting, video-call and e-mail providers.
- Google, when you enable Google Calendar sync.
- Competent authorities, when required by law or court order.

6. COOKIES AND SIMILAR TECHNOLOGIES

We use cookies for authentication, preferences, traffic analytics and internal advertising. You can manage cookies in your browser settings; disabling them may affect Platform functionality.

7. GOOGLE CALENDAR INTEGRATION

Integration is optional and requires explicit consent. We only access the data necessary to create and update class events in the chosen calendar. Users may revoke access at any time in their Google account or in the Platform dashboard.

8. INFORMATION SECURITY

We implement technical and administrative security measures, including encryption in transit (TLS), access control and monitoring. While we strive to protect your data, no system is 100 % secure.

9. DATA RETENTION

We retain data while the account is active and as needed to comply with legal obligations or resolve disputes. Payment data may be kept for up to 10 years to meet tax requirements. Access logs are stored for up to 6 months unless a longer period is required by law.

10. DATA SUBJECT RIGHTS

You may request: (i) confirmation and access; (ii) correction; (iii) anonymization, blocking or deletion; (iv) portability; (v) information on sharing; (vi) consent withdrawal. Contact us at the e-mail below.

11. CHILDREN AND ADOLESCENTS

We do not knowingly collect data from minors under 18 without the consent of a legal guardian. If we inadvertently collect such data, we will delete it.

12. POLICY CHANGES

We may update this Policy periodically. We will notify you at least 10 days in advance by e-mail or internal notification. Continued use after the changes take effect constitutes acceptance.

13. CONTACT

Data Protection Officer (DPO) / Developer: euller@cobaye.io

Support: euller@cobaye.io

Phone/WhatsApp: +55 (27) 99285-8920

Address: Rua José Bittencourt, 196, Caratoira, Vitória – Espírito Santo – ZIP 29025-664

© 2025 Cobaye Languages. All rights reserved.