

Privacy & Cookies Policy

Updated: 210118

We treat your personal data confidentially and in accordance with the <u>Statutory Data Protection Regulations</u> and this data protection policy. This statement explains what personal data we collect from you, through our interactions with you and through our products, and how we use that data. References to "products" in this statement include services, websites, courses and software that we operate and/or offer.

The provision of personal data requires a minimum age of 18 years and sufficient legal capacity to contract. Please note that some of our services include links to products of third parties whose data protection practices differ from ours. If you provide personal data to any of those products, your data is governed by their data protection statements.

PERSONAL DATA PROCESSING INFORMATION	
Controller	JOHALOHA
Database	CLIENTS
Purpose	Managing information from clients to buy video courses, download material and receive newsletters.
Legality	Individual's Content
Transfers	No transfers to third parties will ever be made
Rights	You may consult your personal information and exercise your rights of access, rectification, cancellation, limitation, or opposition to processing, as well as other rights, as explained in the other information.
How to exercise your rights	Email: info@johaloha.com In writing: Calle Ntra. Sra. De Gracia 12, 2 C, 296 02 Marbella (Málaga)

Please also see our Terms of use for more information and a more formal wording of the following information.

What personal information do we collect from you?

When you request information, want to pre-order, buy or want more information about a product, service or a course at our company you voluntarily provide us with personal information necessary to be able to communicate with you. This personal information could include following data: your name, company name, email, address, telephone and country.



How and why we use your personal information?

We use your personal information to respond to you when you contact us, or to update you about the services we supply or changes to our policies.

How long do we keep your personal information for?

We keep your personal information for the entire duration of your relationship with us. Spanish law requires that we keep paperwork for a set periods of time after certain transactions have taken place and we always follow these laws.

You may ask that your personal information be deleted from our records and if we are legally allowed to do so we will comply with your request.

Who do we share your personal information with?

Only the staff at Johaloha have direct access to your personal data that you have given us, and they have all signed a confidentially agreement to ensure that your data is not misused in any way.

We store your information with programs stored on a cloud server and the providers of these are Thinkific and Loopia. However, they are not allowed to access the data without our specific authorisation and even then, it would be only in the case of technical difficulties with the programs we use.

We collaborate with other companies such as web agencies, universities, consultant companies, etc but will never share your information with them without your express consent.

For more information about the AEPD (in Spanish) CLICK HERE

Who can see the content you give?

Only you and the administration staff can see the information that you give to us via our website or course portals, such as your name, email address and home country. Depending about your enquiry, your information may be passed to our staff so that they can respond to your questions.

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Who Is Responsible for this Website?

Our website is run by Johaloha and kept by the following companies: Redline Solutions S.L.U for layout and updates, Thinkific for the course administration and payment Loopia for backup and Mailchimp for email administration. They all follow the requirements according to GDPR rules.

Email: <u>info@johaloha.com</u> If you have questions or comments about this statement or believe that we have not adhered to it, please contact JOHALOHA, Calle Ntra. Sra. de Gracia 12, 296 02 Marbella (Malaga) with proof of ID and request to see what information we have about you on our records, update or correct the information or request to have the information removed.

When you receive our Newsletters, there are always links at the bottom that allow you to update the information that is stored about you on MailChimp's database or to remove yourself from the mailing list. You can also reply to any of the Newsletters you receive from us via email and asked to be removed from the mailing list. To see Mailchimp's Privacy Policy CLICK HERE.

What data do we collect about your visits to our website?

When you visit the JOHALOHA website, if you click the "accept cookies" button, we receive data from your Internet Service Provider as well as data about the type of device you have and the browser you are using. This data is anonymous and doesn't reveal any personally identifiable information to us. Google Analytics provide us with this anonymous information. To see Google's Privacy Policy & Terms CLICK HERE.

Do we use Cookies to collect personal identifiable information about you? No, never! However, to supply better service to you on our website, we use cookies. If you disable cookies in your browser, some of the features and services provided on our website may no longer work properly for you. For more details about how cookies work and how to disable or remove them from your device, please see below.

How do we respond to official legal requests?

We may access, preserve and share your information in response to a legal request (like a search warrant, court order, official government inspection etc.) if the law requires us to do so.

We may also access, preserve and share information when we in good faith belief it is necessary to: detect, prevent and deal with fraud, money-laundering and other illegal activity; to protect ourselves, you and others.

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Where do we store your personal information?

Your information for course administration is stored in Thinkific's database according to their Privacy PolicyThinkific's Legal Center

Your information is also stored on various secure servers with manual and automatic backups both locally and in the cloud by Loopia <u>Privacy Policy</u>. As mentioned earlier in the policy, your information is encrypted and stored on the servers of the various companies who provide us with the contact and property management software.

We collect and manage your data in accordance with the <u>General Data Protection</u> <u>Regulation</u>

They are also responsible before this Government Body for protecting your data and not allowing unauthorised access to your data. For more information about the AEPD CLICK HERE

How will we let you know of changes to this policy?

Changes to this policy will be posted on our website to give you the opportunity to review, comment on or reject the revised policy.

How will we contact you?

We may contact you by telephone, email, or social media. If you prefer a particular means of contact, please just let us know and we will adjust our records accordingly.

How can you contact us?

If you have any questions on the processing of your personal information, please use the **Contact** page on johaloha.com, send an email to info@johaloha.com or, give us a telephone call.

Statistical Data and Cookies

Our Website uses cookies and activity files that ensure its correct operation and allow us to see the user activity on our site, thus being able to improve its usability and navigation. However, neither we nor Google Analytics collect personal data about our website visitors via said cookies. Cookies are small text files placed on your device by a web server. Cookies have text that can be read by a web server in the domain that issued the cookie to you.

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That text often consists of a string of numbers and letters that uniquely finds your computer but may contain other information as well.

The tool we use to track and analyse the visits to our site is Google Analytics. This is a service provided by Google Inc, a company from Delaware, whose head office address is 1600 Amphitheatre Parkway, Mountain View (California), CA 94043, USA. Google Analytics uses "cookies". An HTTP cookie, commonly referred to as just "cookie", is a parcel of text sent back and forth between a web browser on your computer and the server it accesses. The information that it generates about your use of our site (including your IP address) will be directly transmitted to and logged by Google via their servers in the USA and Ireland. Google will use this information in our account with them solely for analysing how our site is used, compiling activity reports and offering other services that are related to our company activity & Internet use. Google may also send this data to third

parties where current legislation demands it, or when said third parties process the

Google will not associate your IP address with any other data that Google has. You are free to reject the handling of your information or preferences by correctly configuring your computer's Internet Browser as to the handling of cookies. However, please be aware that by doing so you may be limiting the full functionality of our Website. By using our site, you are giving your consent to Google to use your anonymous information following the guidelines as stated previously.

We reserve the right to share this **anonymous information** and **without any type of personally identifiable information**, with other collaborating companies, providers, sponsors and/or advertisers.

We may use cookies for:

information on behalf of Google.

Storing your Preferences, Settings or other Data that you provide through the website.

Site Analytics: We may use cookies to count the number of unique visitors to a web page or service or to develop other aggregate statistics about the operations of our sites and services. These analytics help us use and improve the performance of these sites and services.

Security: We use cookies to detect fraud and abuse of our websites and services. In addition to the first-party cookies we may set when you visit our website, third parties may also set certain cookies on your hard drive when you visit our site. In some cases, which is because we have hired the third party to supply certain services on our behalf, such as site analytics. In other cases, it is because our web pages hold content from third parties, such

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as news content or ads delivered by ad networks. Because your browser connects to those third parties' web servers to retrieve that content, those third parties can set or read their own cookies on your device and may collect information about your online activities across websites or online services. You can usually configure your browser to reject third party cookies.

This is a non-exhaustive list of cookies that may be used by our website; it is intended to illustrate the main reasons why we typically set cookies:

Name	Description
auth	Helps to authenticate you when you sign into our website. Contains information that is linked to your personal profile that you may create on our website.
cookie_consent	Records if and how you consented the use of cookies.
data	Contains data that you can supply to certain parts or function of our website. For example, may contain contact information that you enter in forms so that you don't have to enter it repeatedly.
prefs	Keeps track of your preferences, such as language, colours, etc. Also, may contain if and how you consented the use of cookies.
ferrer	Allows us to know when you arrived on our website and from which other website.
_ga	Google Analytics, random ID used to distinguish users.
_gat	Google Analytics, used to throttle request rate.
(various)	Numerous services provided by Google, such as YouTube and Google Maps. Please see the Google Privacy Policy for further information.

You could accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser settings to decline cookies if you prefer. If you choose to decline cookies, you may not be able to sign in or use other interactive features of our website and services that depend on cookies, and some preferences that are dependent on cookies may not be able to be respected.

If you choose to accept cookies, you also could later delete cookies that you have accepted.

Instructions for blocking or deleting cookies are available in your browser's privacy or help documentation. For the most common browsers:

- Apple Safari
- Apple Safari on iOS (iPhone, iPad)
- Google Chrome
- Microsoft Edge
- Microsoft Internet Explorer 11
- Mozilla Firefox

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