

Privacy Policy

Last updated: 15 November 2022

OWNER AND DATA CONTROLLER

GypsyWander (“us”, “we”, or “our”) operates <https://www.GypsyWander.life>

Contact email: sayhello@GypsyWander.life

We are committed to protecting and respecting your privacy.

This Site collects some personal data from its users.

This Privacy Policy informs you of our views, practices, and policies regarding the collection, use, and disclosure of personal data we receive from users of the Site.

By submitting personal data to us, you agree to us using your personal data as follows.

INFORMATION COLLECTION, BUSINESS PURPOSE AND USE

While using our Site, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you. Personally identifiable information may include, but is not limited to name, email address, cookies, usage data, and password.

We may use your personal information to

- send you newsletters at least weekly
- manage contacts and send messages
- ensure that content from our site is presented in the most effective manner for you and for your computer
- provide you with information, products, or services that you request from us which may be of interest to you
- carry out our obligations arising from any contracts entered into between you and us
- interact with external social networks and platforms
- allow registration and authentication
- allow access to third-party services' accounts
- monitor infrastructure

- manage hosting and backend infrastructure
- interact with live chat platforms
- carry out remarketing and behavioral targeting (including display ads)
- display content from external platforms
- carryout commercial affiliation (e.g. display ads)
- interact with support and feedback platforms
- manage user database

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device. Personal information does not include

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's and GDPR's scope

In particular, we have collected the following categories of personal information from our users within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal	YES

information included in this category may overlap with other categories.

C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	NO
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	YES
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	NO
J. Non-public education information (per the Family Educational Rights	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades,	NO

and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).

transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.

K. Inferences drawn from other personal information.

Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behaviors, attitudes, intelligence, abilities, and aptitudes.

NO

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you submit or transactions related to products and services you purchase.
- Indirectly from you. For example, from your browser while visiting our Site.
- From third parties. For example, from our business partners or service providers.

We do not intentionally collect or use the personal information of minors under sixteen (16) years of age or sell it with or without affirmative authorization.

In addition to the above, we may collect log data and use cookies.

Log Data

Like many site operators, we collect information that your browser sends whenever you visit our Site.

This Log Data may include information such as your computer's Internet Protocol ("IP") address, browser type, browser version, the pages of our Site that you visit, the time and date of your visit, the time spent on those pages, and other statistics.

In addition, we may use third-party services such as Google Analytics that collect, monitor and analyze this data.

Cookies

WHAT COOKIES ARE

Cookies are text files with a small amount of data, which may include an anonymous unique identifier.

Cookies are sent to your browser from a website and stored on your computer's or tablet device's or mobile device's part of the hard drive specifically designated for cookies.

It is standard practice to use cookies to make your experience better when using a website.

Like many sites, we use “cookies” to recognize, collect, and/or track information about, and relevant to, your usage of the Site.

These cookies are known as “first-party cookies”. We may also recognize, collect, and/or track information through cookies set by third parties. These cookies are known as “third-party cookies”. Third-party cookies are used to perform tasks related to advertising, and analytics, and to enable interactive features such as sharing or commenting. Some third parties collect statistics in an anonymized and aggregated form and may not require the consent of the user.

The information that our first-party cookies or third-party cookies recognize, collect, and/or track may include information about your devices, browsing actions, and patterns, such as among others, the type of computer you use, your internet service provider, your browser type, your location, your IP address, the date and time of your visit, the pages viewed, your traffic pattern through the Site.

Upon your first visit to the Site (and periodically after that), we will request your consent to our use of cookies except for those strictly necessary.

WHAT COOKIES WE USE

We use the following categories of cookies on the Site:

Strictly necessary cookies

These cookies are essential to enable you to browse the Site and use its features. We use cookies to save your sessions, your login details, and other information necessary to perform your requests, and to carry out other activities that are strictly necessary for the operation of this Site, for example in relation to the distribution of traffic. We use cookies to save browsing preferences and to optimize your browsing experience.

Analytics cookies

These cookies collect information about your use of the Site, such as for instance, browsing actions, and patterns, the date and time of your visit, the pages viewed, your traffic pattern through the Site.

Through the collection of this information, we are able to monitor and analyze web traffic to the Site. User behaviors may be recognized, collected, and/or tracked.

We use Google Analytics to monitor and analyze web traffic to the Site. Google utilizes the data recognized, collected, and/or tracked on the Site to prepare reports on traffic activities.

This integration of Google Analytics anonymizes your IP address.

Google may use the information recognized, collected, and/or tracked to personalize the ads of its advertising network and may share the information recognized, collected, and/or tracked with other services.

Security cookies

These cookies are essential to our security features. These cookies allow us to detect malicious activities or activities in breach of our terms of use.

Customization cookies

These cookies allow the Site to save information and details such as your username to optimize your experience on the Site and provide personal features.

Social media cookies and pixels

These cookies allow you to share your activity on the Site on social media such as Facebook, LinkedIn, and Twitter, or other external platforms directly from the Site.

Cookies may still be recognized, collected, and/or tracked on the pages where buttons, widgets, or other applications are installed, even when you do not actively use it.

The interaction and information recognized, collected, and/or tracked through the Site are always subject to your privacy settings for each social network and external platform.

You are encouraged to refer to the privacy policy of the relevant social network or external platform and to log out from the respective network or platform in order to make sure that the information collected on the Site is not tracked back to your profile.

Facebook Like button and Facebook social widgets

The Facebook Like button and Facebook social widgets are applications allowing interaction with the Facebook social network.

Twitter Tweet button and Twitter social widgets

The Twitter Tweet button and Twitter social widgets are applications allowing interaction with the Twitter social network.

YouTube video widget

YouTube is a video sharing website that allows this Site to incorporate video content on its pages and posts.

Live chat platform

This application allows you to interact with a third-party live chat platform directly from the Site, e.g., to get in contact with the Site support or customer care service.

This application may recognize, collect, and/or track browsing and usage information on the pages where it is installed, even if you do not actively use it. If you do actively use it, your live chat conversation may be logged or recorded.

Social media pixels

We reserve the right to use social media pixels. These pixels allow social media such as Facebook to track visitors to external websites in order to tailor their advertising activities to target users while browsing their social media network. For information regarding these pixels, you are encouraged to refer to the privacy policy of the relevant social network.

Facebook pixel

Facebook pixel connects the activity performed on the Site with the Facebook advertising network, including Instagram and Audience ads.

Targeting or advertising cookies

These cookies record your browsing actions and patterns on the Site, such as among others, the pages you have visited and the links you have followed. The information recognized, collected, and/or tracked by these cookies is used to make our Site and the advertising displayed by way of links or banners on the Site more relevant to your interests. For the same purpose, this information may also be shared with third parties, such as Google AdSense.

HOW TO CONTROL COOKIES

In accordance with this Privacy Policy, you have the right to accept or reject cookies.

Strictly necessary cookies may not be rejected since they are essential to enable you to browse the Site and use its features.

Should you reject cookies, you will still be able to use the Site although certain features and functionalities may not be available to you, and/or certain areas may be restricted.

In addition to what is indicated within this Policy, you can manage preferences for cookies directly from within your own browser and prevent – for example – third parties from installing cookies.

Through browser preferences, it is also possible to delete cookies installed in the past, including the cookies that may have saved the initial consent for the installation of cookies by this Site.

You can find information about how to manage cookies in the most commonly used browsers (e.g., Google Chrome, Mozilla Firefox, Apple Safari, and Microsoft Internet Explorer) on the website of the browser of your choice.

With regard to cookies installed by third parties, users can manage their preferences and withdrawal their consent by clicking the related opt-out link (if provided), by using the means provided in the third party's privacy policy, or by contacting the third party.

DATA STORAGE

Your personal data may be transferred to, and stored at, a destination outside the European Economic Area ("EEA").

By submitting your personal data, you agree to this transfer, storing, or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

LAWFUL BASIS OF PROCESSING PERSONAL DATA UNDER THE GDPR

We may process personal data relating to users if one of the following applies:

- users have given their consent for one or more specific purposes;
- provision of data is necessary for the performance of an agreement with the user and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which we are subject;

- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in us;
- processing is necessary for the purposes of the legitimate interests pursued by us or by a third party.

DATA RETENTION

We process and store your personal data for as long as required by the purpose they have been collected for.

Therefore:

- personal data collected for purposes related to the performance of a contract between us and the user will be retained until such contract has been fully performed;
- personal data collected for the purposes of our legitimate interests will be retained as long as needed to fulfill such purposes;
- we may be allowed to retain personal data for a longer period whenever the user has given consent to such processing, as long as such consent is not withdrawn;
- we may be obliged to retain personal data for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority.

Once the retention period expires, personal data will be deleted and some of your rights (i.e., the right to access, the right to erasure, the right to rectification, and the right to data portability) cannot be enforced after the expiration of the retention period. You may find specific information regarding your rights within the relevant section of this Privacy Policy or by contacting us at sayhello@GypsyWander.life.

THIRD-PARTY DISCLOSURE

We do not sell, trade, or otherwise transfer to outside parties your personal information unless we provide users with advance notice. This does not include website hosting partners and other parties who assist us in operating our website, conducting our business, or serving our users (such as, for example, MailerLite, our email marketing service), so long as those parties agree to keep this

information confidential. We may also release information when its release is appropriate to comply with the law, enforce our site policies, or protect ours or others' rights, property, or safety.

However, non-personally identifiable visitor information may be provided to other parties for marketing, advertising, or other uses.

In the preceding twelve (12) months, we have disclosed the following categories of personal information for a business purpose:

Category A: Identifiers

Category B: California Customer Records personal information categories

Category D: Commercial information.

Category F: Internet or other similar network activity.

Category G: Geolocation data.

We disclose your personal information for a business purpose to the following categories of third parties:

- Professional service providers.
- Third parties whose services you purchase through our Site.
- Social Media Networks.

YOUR RIGHTS UNDER THE GDPR

Users based in the European Union have the right to do the following:

- Withdraw their consent at any time. Users have the right to withdraw consent where they have previously given their consent to the processing of their personal data.
- Object to processing of their data. Users have the right to object to the processing of their data if the processing is carried out on a legal basis other than consent.

- Access their data. Users have the right to learn if data is being processed by us, obtain disclosure regarding certain aspects of the processing, and obtain a copy of the data undergoing processing.
- Verify and seek rectification. Users have the right to verify the accuracy of their data and ask for it to be updated or corrected.
- Restrict the processing of their data. Users have the right, under certain circumstances, to restrict the processing of their data. In this case, we will not process their data for any purpose other than storing it.
- Have their personal data deleted or otherwise removed. Users have the right, under certain circumstances, to obtain the erasure of their data from us.
- Receive their data and have it transferred to another controller. Users have the right to receive their data in a structured, commonly used, and machine-readable format and, if technically feasible, to have it transmitted to another controller without any undue delay.
- Lodge a complaint. Users have the right to bring a claim before their competent data protection supervisory authority.

You can exercise your right to prevent such processing by contacting us at sayhello@GypsyWander.life.

These requests can be exercised free of charge and will be addressed by us as soon as possible and always within thirty (30) days.

YOUR RIGHTS UNDER THE CCPA

Users who reside in California have the right to request any of the following

- disclosure of the categories and specific pieces of personal information we have collected
- deletion of personal information we have collected from you
- disclosure of the categories of personal information we have collected, the categories of sources from which we collected it, the business or commercial purpose for collecting or selling it, the categories of third

parties with whom we share it, and the specific pieces of personal information we have collected

- disclosure of the categories of personal information we collected or sold and the categories of third parties to whom it was sold

You have the right not to receive discriminatory treatment for the exercise of these privacy rights.

Requests can be submitted by you or someone legally authorized to act on your behalf by email to sayhello@GypsyWander.life.

These requests can be exercised free of charge and will be addressed by us as soon as possible and always within forty-five (45) days.

YOUR RIGHT TO OPT OUT OF THE SALE OF PERSONAL INFORMATION

Under the CCPA, “sell,” “selling,” “sale,” or “sold,” means selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer’s personal information by the business to another business or a third party for monetary or other valuable consideration.

As per the CCPA definition, selling personal information includes disclosing information to a third party by using analytics tools, running ads, or having social media pixels and plugins installed.

Users who reside in California have the right to opt out of the sale of personal information.

Requests to exercise your right to opt-out can be submitted by you or someone legally authorized to act on your behalf by email to sayhello@GypsyWander.life.

NON-DISCRIMINATION AND NOTICE OF FINANCIAL INCENTIVES

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you with a different level or quality of goods or services.

- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels.

Any financial incentive we offer will reasonably relate to the value of your personal information and will describe the material terms of the financial incentive program. Participation in any financial incentive program we offer requires your prior consent to opt in, which you may revoke at any time.

We occasionally offer a \$100 discount on our courses to users who subscribe to our newsletter and/or marketing emails. This has been calculated by taking into account the value of each subscriber of \$1 per month and \$30-lifetime earning potential and the cost of email marketing and overheads per subscriber as per the industry average.

We do not use financial incentive practices that are unjust, unreasonable, coercive, or usurious in nature.

SECURITY

The security of your personal information is important to us.

Our website is scanned on a regular basis for security holes and known vulnerabilities in order to make your visit to our Site as safe as possible.

We use regular Malware Scanning.

Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems and are required to keep the information confidential.

In addition, all sensitive/credit information you supply is encrypted via Secure Socket Layer (SSL) technology.

We implement a variety of security measures when a user places an order enters, submits, or accesses their information to maintain the safety of your personal information.

All transactions are processed through a gateway provider and are not stored or processed on our servers.

Unfortunately, no method of transmission over the internet is completely secure. While we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security.

CHANGES TO THIS PRIVACY POLICY

This Privacy Policy is effective as of 15 November 2022 and will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on this page.

We reserve the right to update or change our Privacy Policy at any time and you should check this Privacy Policy periodically. Your continued use of our Site after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide by and be bound by the modified Privacy Policy.

If we make any material changes to this Privacy Policy, we will notify you either through the email address you have provided us or by placing a prominent notice on our website.

We will update our Privacy Policy at least once every twelve (12) months.

CONTACT US

If you have any questions or concerns about this Privacy Policy, please contact us by email to sayhello@GypsyWander.life.

CalOPPA (CALIFORNIA ONLINE PRIVACY PROTECTION ACT)

We agree to users visiting our Site anonymously.

Do not track signals

Pursuant to the California Online Privacy Protection Act (CalOPPA), we hereby disclose that we do not currently honor “do not track” signals issued by browsers or other third-party sources.

COPPA (CHILDREN ONLINE PRIVACY PROTECTION ACT)

For the collection of personal information from children under the age of thirteen (13) years old, we comply with the Children’s Online Privacy Protection Act (COPPA).

The Site is intended for individuals who are eighteen (18) years of age or older.

By visiting and using the Site, you represent and warrant that you are of legal age and meet all of the foregoing eligibility requirements.

The Site is not intended for children under thirteen (13) years of age.

We do not specifically market to children under thirteen (13) years of age. We do not knowingly collect personal information from children under thirteen (13) years of age. We do not knowingly collect personal information from children under thirteen (13).

If you are under thirteen (13) years of age, please do not use the Site or provide any information on the Site, including your name, screen name, username, address, telephone number, email address, and payment details.

If we learn we have collected or received personal information from a child under thirteen (13) years of age without verification of consent from a parent or guardian, the personal information collected or received shall be deleted with no delay.

If you believe we might have any information concerning a child under thirteen (13) years of age, please contact us at sayhello@GypsyWander.life and we will endeavor to delete such information with no delay.