

# PRIVACY POLICY

This Platform collects some Personal Data from its Users.

## Definitions:

### Personal Data (or Data)

Personal data constitutes any information that, directly or indirectly, including in conjunction with any other information (including a personal identification number), makes a natural person identified or identifiable.

### Usage Data

This refers to information collected automatically through this Platform (also through third-party applications integrated into this Application), including: IP addresses or domain names of the computers used by the User connecting with this Application, URI (Uniform Resource Identifier) addresses, the time of the request, the method used to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's response (success, error, etc.), the country of origin, the browser and operating system characteristics used by the visitor, the various time details of the visit (e.g., the time spent on each page), and details about the path followed within the Application, with particular reference to the sequence of pages visited, the operating system parameters, and the User's IT environment.

### User

The individual using this Application who, unless otherwise specified, coincides with the Data Subject.

### Data Subject

The natural person to whom the Personal Data refers.

### Data Processor (or Processor)

The natural or legal person, public authority, agency, or any other body that processes Personal Data on behalf of the Controller, as described in this privacy policy.

### Data Controller (or Controller)

The natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of this Application. Unless otherwise specified, the Data Controller is the owner of this Application.

### Service

The service provided by this Application as described in the related terms on this site/application.

## **European Union (or EU)**

Unless otherwise specified, any reference to the European Union in this document includes all current member states of the European Union and the European Economic Area.

## **Cookies**

Cookies are Tracking Tools consisting of small sets of data stored in the User's browser.

## **Tracking Tool**

A Tracking Tool is any technology – e.g., Cookies, unique identifiers, web beacons, embedded scripts, e-tags, and fingerprinting – that enables the tracking of Users, for example by collecting or saving information on the User's device.

---

## **Tracking Tools**

### **Google Login (External Login)**

We offer the possibility to register or log in to the site using your Google account. In this case, we receive from Google some information necessary for authentication, such as name, email address, and profile image (if available). This data is used solely to manage access to the site and is not shared with third parties.

### **Google Analytics**

We use Google Analytics to collect statistical information about users' use of the site, such as pages visited, time spent on the site, device type, geographic location (approximate), and other navigation data. This information is collected anonymously and in aggregated form to improve our services and user experience. Google may collect additional data according to its own terms and conditions, available at: <https://policies.google.com/privacy>

---

## **DATA CONTROLLER**

**AirLessons by Nicolas Semenzi** – Registered office: SERIATE (BG) VIA GIUSEPPE GARIBALDI 49, ZIP 24068, Italy.

### **Email addresses of the Data Controller:**

- [privacy@airlessons.net](mailto:privacy@airlessons.net)
- [n.semenzi@airlessons.net](mailto:n.semenzi@airlessons.net)

---

## Types of Data Collected

Among the Personal Data collected by this platform, either independently or through third parties, are:

Category	Collected Data	Purpose of Processing	Legal Basis
Profile Data	IP Address	Platform security and abuse prevention	Legitimate interest
Profile Data	Profile ID	Account management and service operation	Contract execution
Profile Data	Payment ID	Account management and service operation	Contract execution
Profile Data	Profile status (active/inactive)	Account management and service operation	Contract execution
Profile Data	Update date	Account management and service operation	Contract execution
Profile Data	Registration date	Account management and service operation	Contract execution
Profile Data	First name	User identification and profile customization	Contract execution
Profile Data	Last name	User identification and profile customization	Contract execution
Profile Data	Email	User contact and account management	Contract execution / Consent
Profile Data	Certified email (PEC)	User contact and account management	Contract execution
Profile Data	Phone	User contact and account management	Contract execution / Consent
Profile Data	Date of birth	User identification and profile customization	Contract execution
Profile Data	Gender	User identification and profile customization	Contract execution
Profile Data	VAT Number	Invoicing and tax obligations	Legal obligation
Profile Data	Company Name	Invoicing and tax obligations	Legal obligation
Profile Data	Nationality	User identification and profile customization	Contract execution
Profile Data	Address	Contact, invoicing, personal profile	Contract execution / Legal obligation
Profile Data	Country	Contact, invoicing, personal profile	Contract execution
Profile Data	City	Contact, invoicing, personal profile	Contract execution
Profile Data	ZIP Code	Contact, invoicing, personal profile	Contract execution
Profile Data	Residence Address	Contact, invoicing, personal profile	Contract execution

Profile Data	Tax Code	Invoicing and tax obligations	Legal obligation
Profile Data	Chamber of Commerce Number (CCIAA)	Invoicing and tax obligations	Legal obligation
Profile Data	Profile Picture	Profile customization	Consent
Profile Data	Professional Titles	Profile display and user matching	Contract execution / Legitimate interest
Profile Data	English Proficiency Level	Profile display and user matching	Contract execution / Legitimate interest
Profile Data	Spoken Languages and Level	Profile display and user matching	Contract execution / Legitimate interest
Profile Data	Personal Rating	Profile display and user matching	Legitimate interest
Profile Data	Review Content	Publishing reviews on the site	Legitimate interest
Profile Data	Subscription Type	Lesson and plan management	Contract execution
Profile Data	Active Lessons	Lesson management and availability	Contract execution
Profile Data	Completed Lessons	Lesson management and activity history	Contract execution
Profile Data	Personal Description	Profile display	Contract execution / Legitimate interest
Profile Data	In-person Availability	Lesson scheduling	Contract execution
Statistics	How you heard about us (mode)	User origin analysis for statistical purposes	Consent
Statistics	How you heard about us (details)	User origin analysis for statistical purposes	Consent
Messaging	Content	Communications between users	Contract execution
Messaging	Timestamp	Communications between users	Contract execution
Messaging	Recipient	Communications between users	Contract execution
Transactions	Subscription Type	Payment and selected service management	Contract execution
Transactions	Stripe ID	Payment processing	Contract execution
Transactions	Transaction Type	Payment processing	Contract execution
Transactions	Transaction ID	Payment processing	Contract execution
Transactions	Number of Transactions	Plan management and monitoring	Contract execution
Transactions	Amount	Invoicing and tax obligations	Legal obligation
Transactions	Date	Invoicing and operational management	Legal obligation / Contract execution
Transactions	Invoice Issued (yes/no)	Invoicing	Legal obligation
Transactions	Refund Issued (yes/no)	Refund management	Contract execution
Transactions	Transaction Status	Financial operations management	Contract execution

Lessons	Lesson ID	Lesson management	Contract execution
Lessons	Type and Subjects	Lesson organization	Contract execution
Lessons	Hourly Rate	Financial management of lessons	Contract execution
Lessons	Date	Booking management	Contract execution
Lessons	Time	Booking management	Contract execution
Lessons	Booking Status	Lesson status verification and access to service	Contract execution
Lessons	Physical Location (yes/no)	In-person lesson organization	Contract execution
Lessons	City of Physical Location	In-person lesson organization	Contract execution
Lessons	Distance from City	In-person lesson organization	Contract execution
Lessons	Discount (percentage)	Promotion application	Contract execution
Lessons	Creation Date	Registration and activity tracking	Contract execution
Lessons	Instructor Percentage	Instructor fee calculation	Contract execution
Lessons	Platform Percentage	Platform commission management	Contract execution
Lessons	Stripe Percentage	Transaction cost and fee management	Contract execution

## Full Details on Each Type of Personal Data Collected

Specific information texts displayed before the collection of Personal Data provide complete details about each category of data collected.

Personal Data may be freely provided by the User or, in the case of Usage Data, collected automatically when using this Application.

Unless otherwise specified, all Data requested by this Application is mandatory. If the User refuses to provide it, the Application may be unable to provide the Service.

Where the Application specifies that certain Data is optional, Users are free to refrain from communicating such Data without affecting the availability or operation of the Service. Users uncertain about which Data is mandatory are encouraged to contact us ([privacy@airlessons.net](mailto:privacy@airlessons.net) - [n.semenzi@airlessons.net](mailto:n.semenzi@airlessons.net)).

Any use of Cookies—or other tracking tools—by this Application or by the owners of third-party services used by this Application is intended to provide the Service requested by the User, in addition to other purposes described in this document and the Cookie Policy.

Users are responsible for any third-party Personal Data obtained, published, or shared through this Application and confirm that they have the third party's consent to provide the Data to the Owner.

---

# Methods and Place of Data Processing

## Processing Methods

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or destruction of Personal Data.

Processing is carried out using IT and/or telematic tools, with organizational methods and logic strictly related to the purposes indicated.

In addition to the Owner, in some cases, other parties involved in the operation of this Application (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communication agencies) may have access to the Data as Data Processors, if necessary. An updated list of these parties may be requested from the Owner at any time.

## Place

Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Personal Data may be transferred to a country other than the one the User is located in. In such cases, the Owner ensures that the transfer is carried out in accordance with Articles 44 and following of Regulation (EU) 2016/679 (GDPR).

---

## Retention Period

Unless otherwise specified in this document, Personal Data is processed and stored for the time required to fulfill the purposes for which it was collected and may be stored for a longer period due to legal obligations or based on User consent.

- Personal Data collected for the execution of a contract between the Owner and the User will be retained until such contract has been fully performed.
- Personal Data collected for purposes of the Owner's legitimate interests will be retained as long as needed to fulfill those purposes. The User may obtain more information regarding the legitimate interest pursued by the Owner by contacting them.
- Where processing is based on User consent, the Owner may retain Personal Data until the consent is withdrawn. The Owner may also be required to retain Personal Data for a longer

period in compliance with a legal obligation or by order of an authority.

Once the retention period expires, Personal Data will be deleted. Therefore, after that time, the right to access, erasure, rectification, and data portability can no longer be exercised.

---

## Purposes of Processing

The User's Data is collected to allow the Owner to provide the Service, comply with legal obligations, respond to enforcement requests, protect its rights and interests (or those of Users or third parties), detect fraudulent or malicious activity, and for the following purposes:

- Contacting the User
- Occasional marketing
- Displaying content from external platforms
- Tag management

For detailed information on the purposes of processing and the Personal Data used for each purpose, Users may refer to the section "Details on the Processing of Personal Data."

---

## Details on the Processing of Personal Data

Collected Personal Data is used for the following purposes, using the following services:

- Contacting the User (e.g., contact form, email or phone responses)
- Account and profile management (e.g., registration, login, profile updates, customization)
- Lesson booking and management (e.g., availability, location, time, history, preferences)
- Instructor management (e.g., credentials, spoken languages, reviews, percentages)
- Payment processing and invoicing (via Stripe: payment data, transaction ID, refunds)

- Displaying content from external platforms (e.g., YouTube videos, Google Maps)
  - Managing communications between users (e.g., messages, recipients, timestamps)
  - Site usage statistics and analytics (via Google Analytics)
  - Tag management (technical tools for categorizing content and services)
  - Profiling and recommendations (e.g., instructor/course suggestions based on profile)
  - Fulfilling legal obligations (e.g., tax and accounting data retention)
- 

## Cookie Policy

This platform uses Tracking Tools. To learn more, Users can consult our [Cookie Policy](https://www.airlessons.net/Legal/AirLessons?section=Privacy%20Policy).  
<https://www.airlessons.net/Legal/AirLessons?section=Privacy%20Policy>

## Tracking Tools

- **Google Login (External Login):**  
We offer Users the ability to register or log in using their Google account. In this case, we receive some authentication data from Google, such as name, email address, and profile picture (if available). This data is used exclusively to manage access and is not shared with third parties.
  - **Google Analytics:**  
We use Google Analytics to collect statistical information about how users interact with our site—e.g., visited pages, session duration, device type, approximate geographic origin, and other browsing data. This data is aggregated and anonymized to improve our services. Google may collect additional data under its own terms: [Google Privacy Policy](#)
- 

## Legal Basis for Processing

The Owner processes User Personal Data lawfully, based on one of the following:

- The User has given consent for one or more specific purposes;

- Processing is necessary for the performance of a contract with the User and/or for any pre-contractual measures;
- Processing is necessary for compliance with a legal obligation;
- Processing is necessary for the legitimate interests pursued by the Owner or a third party, provided that such interests are not overridden by the User's fundamental rights and freedoms.

The Owner is always available to clarify the specific legal basis that applies to each type of processing.

---

## User Rights

Users have the right to:

- Withdraw their consent at any time
- Object to the processing of their Data
- Access their Data
- Verify and request rectification
- Restrict the processing of their Data
- Request the erasure of their Personal Data
- Receive their Data in a structured, machine-readable format and have it transferred to another controller
- Lodge a complaint with the relevant data protection authority

Users also have the right to know the legal basis for transferring Data outside the EU and the safeguards taken to protect their Data.

---

## Right to Object

Where Personal Data is processed in the public interest, in the exercise of official authority, or for the legitimate interests of the Owner, Users may object to such processing for reasons related to their particular situation.

Where Personal Data is processed for direct marketing purposes, Users may object at any time without providing justification. If a User objects, their Personal Data will no longer be processed for such purposes.

---

## How to Exercise These Rights

To exercise their rights, Users may contact the Owner at the addresses provided in this document.

Requests are free of charge and handled as quickly as possible, in any case within one month.

The Owner will inform third-party recipients of any rectifications or deletions unless it proves impossible or involves disproportionate effort.

---

## Additional Information on Processing

- **Legal Defense:**

The User's Personal Data may be used for legal defense by the Owner in court or in the stages leading to possible legal action arising from improper use of this Application or its related Services.

- **Specific Notices:**

At the User's request, in addition to this policy, this Application may provide contextual information concerning specific Services or the collection and processing of Personal Data.

- **System Logs and Maintenance:**

For operation and maintenance purposes, this Application and any third-party services may collect system logs—files that record interactions and may contain Personal Data, such as the User's IP address.

- **Information Not Contained in This Policy:**

More details about the processing of Personal Data can be requested from the Data Controller at any time.

---

# Changes to This Privacy Policy

The Owner reserves the right to modify this privacy policy at any time, informing Users on this page and possibly within the Application. Where technically and legally feasible, a notice will also be sent to Users via the contact information available to the Owner.

If the changes affect processing based on the User's consent, the Owner will collect the User's consent again, if necessary.

---

## Legal References

Unless otherwise specified, this privacy policy applies exclusively to this Platform.

**Last Update:** July 22, 2025