

Privacy Policy

Effective date: 9 May 2026 · Website: haochinese.ru/en

This Privacy Policy explains how Individual Entrepreneur Kristina Khelisupali ("we", "us", "our" or the "Controller") collects, uses, stores and protects personal data relating to visitors, clients and students using our website and online educational services.

1. Data Controller

The data controller responsible for the processing of personal data is:

Controller	Individual Entrepreneur Kristina Khelisupali
Registration No.	01501134269
Registered address	Tbilisi, Bob Walsh St. 30-96, Georgia
E-mail	kristinakhelisupali@gmail.com
Phone	+7 (950) 649-29-06
Telegram	https://t.me/haoznaet
WhatsApp	https://wa.me/79506492906

This Privacy Policy applies to personal data collected through:

- our website;
- online lesson and learning platforms;
- enquiry and registration forms;
- payment services;
- e-mail and messaging services;
- social media;
- video communication platforms;
- other services used to provide our online language courses.

2. Personal Data We Collect

Depending on how you interact with us, we may collect and process:

- first and last name;
- telephone number;
- e-mail address;
- student's name and relevant information required to organise lessons;
- student's age;
- language level;
- learning goals and preferences;
- history of enquiries and correspondence with us;
- information relating to payments and refunds;
- IP address;
- browser and device information;
- information about how you interact with our website;
- other information that you voluntarily provide to us.

We do not intentionally request or collect special categories of personal data unless such information is voluntarily provided and is necessary for a specific purpose.

Where our services are provided to a child, personal data may be provided by the child's parent or legal guardian.

3. How We Use Personal Data

We may process personal data for the following purposes:

- responding to enquiries;
- communicating with clients and students;
- arranging trial and regular online lessons;
- assessing a student's language level and learning goals;
- selecting and assigning an appropriate teacher;
- providing access to educational materials and online learning platforms;
- administering courses and lessons;
- processing payments and refunds;
- sending important service-related notifications;
- providing customer support;
- improving our educational services;
- analysing website performance and usage;

- measuring the effectiveness of advertising;
- fulfilling our contractual obligations;
- complying with applicable legal and regulatory requirements.

4. Legal Bases for Processing

Where required by applicable law, we process personal data on one or more of the following legal bases:

- your consent;
- performance of a contract with you;
- taking steps at your request before entering into a contract;
- our legitimate interests in operating and improving our educational services, where those interests do not override your rights and interests;
- compliance with applicable legal obligations.

Where processing is based on consent, you may withdraw your consent at any time. Withdrawal of consent does not affect the lawfulness of processing carried out before the withdrawal.

5. Website Analytics and Cookies

We may use cookies, analytics technologies and similar tools to understand how visitors use our website and to improve its functionality.

We currently use:

- Yandex Metrica (counter ID: **111308239**);
- Tilda Analytics;
- other analytics technologies that may be implemented on the website.

These services may automatically process technical information, including IP address, browser and device information, pages visited, approximate location derived from technical data and interactions with the website.

Where required by applicable law, non-essential cookies and similar technologies will be used only after the user has provided the necessary consent. Users may also manage cookies through their browser settings.

6. Sharing Personal Data

We do not sell personal data.

We may share personal data with third parties only where reasonably necessary to operate our business and provide our services. Such recipients may include:

- teachers, managers and course coordinators;
- banks and payment service providers;
- online learning platforms;
- video communication providers;
- CRM and customer management systems;
- e-mail and messaging services;
- analytics providers;
- hosting and IT service providers;
- contractors providing technical or administrative support.

We require persons who have access to personal data to use it only for the purposes for which access has been granted and to protect it appropriately.

Personal data may also be disclosed where required by applicable law, regulation, court order or a lawful request from a competent public authority.

7. International Data Transfers

Because our educational services are provided online and we use third-party technology providers, personal data may be processed or stored in countries other than the country in which the user resides.

Where required by applicable law, we take reasonable steps to ensure that appropriate safeguards are in place for international transfers of personal data.

The privacy practices of independent third-party services may also be governed by their own privacy policies.

8. Data Retention

We retain personal data only for as long as reasonably necessary for the purposes described in this Privacy Policy, including providing our services, maintaining appropriate business and payment records, resolving disputes and complying with applicable legal obligations.

Different categories of personal data may therefore be retained for different periods.

When personal data is no longer required, we will delete or anonymise it where reasonably practicable, unless further retention is required by law.

9. Data Security

We take reasonable organisational and technical measures designed to protect personal data against:

- unauthorised or unlawful access;

- accidental loss;
- alteration;
- unauthorised disclosure;
- destruction.

Access to personal data is limited to persons who reasonably require such access to provide or administer our services. However, no method of transmitting or storing information electronically can guarantee absolute security.

10. Children's Personal Data

Our language courses may be provided to children.

Where a student is a minor, we may collect information about the student from their parent or legal guardian for the purpose of arranging and providing educational services.

Parents or legal guardians may contact us regarding personal data relating to their child using the contact details provided in this Privacy Policy.

Where consent from a parent or legal guardian is required under applicable law, we will request such consent before processing the child's personal data.

11. Your Rights

Depending on the law applicable to you and your location, you may have the right to:

- request information about the personal data we process about you;
- request access to your personal data;
- request correction of inaccurate or incomplete personal data;
- request deletion of personal data;
- request restriction of certain processing;
- object to certain processing;
- withdraw consent where processing is based on consent;
- exercise any other rights available under applicable data protection law.

Some rights may be subject to legal limitations or exceptions.

To make a request concerning your personal data, please contact: **kristinakhelisupali@gmail.com**

We will respond within the period required by applicable law.

12. Third-Party Services and Links

Our website or educational services may contain links to, or use services provided by, third parties.

These third parties may process personal data in accordance with their own privacy policies and terms.

We encourage users to review the privacy information provided by third-party services they choose to use.

13. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our services, technologies or applicable legal requirements.

The current version will be published on our website together with its effective date.

Where required by applicable law, we will provide additional notice or obtain consent before making changes that materially affect the way personal data is processed.

14. Contact Us

If you have any questions about this Privacy Policy or the processing of personal data, please contact:

Controller	Individual Entrepreneur Kristina Khelisupali
E-mail	kristinakhelisupali@gmail.com
Phone	+7 (950) 649-29-06
Telegram	https://t.me/haoznaet
WhatsApp	https://wa.me/79506492906

Consent to the Processing of Personal Data

By submitting an enquiry or registration form, registering for our educational services, or otherwise expressly providing consent where requested, I confirm that I have read and understood the Privacy Policy and consent to the processing of my personal data by Individual Entrepreneur Kristina Khelisupali for the purposes described below.

The personal data processed may include:

- first and last name;
- telephone number;
- e-mail address;

- student's name and relevant details;
- student's age;
- language level and learning goals;
- payment and refund information;
- other information voluntarily provided by me.

Personal data may be processed for the purposes of:

- responding to enquiries;
- arranging and providing online language lessons;
- selecting an appropriate teacher;
- communicating with me;
- administering educational services;
- providing access to learning materials and platforms;
- processing payments and refunds;
- fulfilling contractual obligations;
- sending service-related notifications and information connected with the services I have requested.

Personal data may be processed using automated systems or by other means.

Where I provide personal data relating to a minor for whom I am legally responsible, I confirm that I am authorised to provide that information for the purpose of arranging and providing educational services.

This consent remains valid until it is withdrawn, unless the relevant processing is based on another lawful basis or continued retention is required by applicable law.

I may withdraw my consent at any time by contacting: **kristinakhelisupali@gmail.com**

Withdrawal of consent does not affect the lawfulness of processing carried out before the withdrawal.