

Privacy Policy

SULIKOMAS – Business English Lessons

Effective as of: April 18, 2026

Last revised: April 18, 2026

1. Introduction

Suliko Arjevaniidze („Controller“ or „we“, „us“, „our“), a sole trader operating under an individual activity certificate pursuant to Lithuanian law, respects your privacy and is committed to protecting your personal data. This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you visit our website www.sulikomas.com (the „Site“), book online Business English lessons, or otherwise engage with our services.

We operate in full compliance with the General Data Protection Regulation (EU) 2016/679 („GDPR“) and the Lithuanian Law on Legal Protection of Personal Data. As the data controller, we determine the purposes and means of processing your personal data.

2. Controller Details

Suliko Arjevaniidze

Pakruojo g. 8-8, LT-92269 Klaipėda, Klaipėda County, Lithuania

Email: privacy@sulikomas.com

Website: www.sulikomas.com

We self-manage GDPR compliance and do not have a Data Protection Officer. For complaints, contact the State Data Protection Inspectorate (Valstybinė duomenų apsaugos inspekcija, ADA) at www.ada.lt or ada@ada.lt.

3. What Personal Data We Collect

3.1 Identity and Contact Data

Full name, Email address, Phone number (including WhatsApp), Company name, Job title, Company VAT number (for invoicing)

3.2 Booking and Course Data

Preferred timezone, Self-assessed English level, Lesson preferences and special requests, Rescheduling requests

3.3 Assessment and Progress Data

Spoken English level assessment (e.g., A2/B1 ratings for accuracy, fluency, vocabulary), Professional strengths (e.g., discussing HR, corporate culture), Areas for improvement (e.g., grammar, linking words), Sample speech corrections, Personalized 5-hour course plans with topics like workplace culture, comparatives, employee retention

3.4 Lesson Delivery Data

Class notes (vocabulary, pronunciation tips, grammar suggestions), Lesson materials and plans, Lesson history and scheduling, Payment history, Course preferences and feedback

3.5 Technical Data

Device type, Pages visited and time spent, Last login timestamp, IP address (for security only)

3.6 Payment Data

- Transaction confirmations and invoice details

Important notes

We do not collect or store bank/card details – all payments are processed securely by Revolut UAB via embedded gateway.

We never collect special category data (e.g., health, religion, political opinions).

- Geographical location data is used only for anonymous traffic analytics and not stored or linked to individuals.
- No video recordings are stored unless specifically requested by you (expire within 30 days, misuse may result in termination of your course. Visit [terms](#)).
- Live transcripts are deleted immediately after generating class notes.

4. How and Why We Use Your Data

4.1 Purposes and Legal Bases

We only process personal data where we have a lawful basis under GDPR Article 6:

Purpose	Data Categories	Legal Basis	Legitimate Interests (Art. 6(1)(f))
Booking, scheduling, delivering lessons via Google Meet	All categories	Contract performance (Art. 6(1)(b))	N/A
Sending automated notifications (session confirmations, materials, rescheduling, renewals, no-shows)	Contact, booking data	Contract performance / Legitimate interests (Art. 6(1)(b)/(f))	Service delivery, user engagement
Generating assessments, class notes, progress reports, yearly recaps	Assessment, lesson data	Contract performance (Art. 6(1)(b))	N/A
Processing payments, issuing invoices	Payment, contact data	Contract performance / Legal obligation (Art. 6(1)(b)/(c))	N/A
Website analytics and improvement	Technical data	Legitimate interests (Art. 6(1)(f))	Site functionality; balanced against privacy rights
Security and fraud prevention	Technical, payment data	Legitimate interests (Art. 6(1)(f))	Protecting our services
Promotional emails (max 1 email to publicly available professional contacts from LinkedIn/company sites)	Contact data	Legitimate interests (Art. 6(1)(f))	Business development; limited scope, opt-out provided

4.2 Legitimate Interests Assessment

For legitimate interests processing:

- Necessity:** Essential for business operations.
- Balancing test:** Minimal data, clear opt-out options, no sensitive information.
- Your rights:** You can object anytime (see Section 7).

Automated decision-making: None. All recommendations are based on professional teacher assessment. AI tools (Perplexity Pro) receive only anonymized data.

5. Cookies and Similar Technologies

Our Site uses cookies managed by Wix.com. You see a cookie banner on first visit to manage preferences.

Cookie Type	Purpose	Provider	Duration	Legal Basis
Essential	Site functionality, forms, security, payments	Wix	Session / Persistent	Legitimate interests
Analytics	Traffic analysis, device data, page views	Wix	Up to 1 year	Legitimate interests (opt-out available)
Functional	Wix Chat widget, CMS storage	Wix	Persistent	Contract performance
Marketing	None currently active	N/A	N/A	Consent required

Non-essential cookies require **opt-in consent**. You can withdraw consent anytime via cookie settings. See Wix Cookie Policy for technical details.

6. Third Parties and International Transfers

We share data **only** with trusted processors under data processing agreements (DPAs):

Processor	Purpose	Location	Safeguards	Legal Basis
Wix.com	Hosting, CMS, forms, chat, automated emails	Ireland (EEA)	Wix DPA	Legitimate interests
Revolut UAB	Payment processing	Lithuania (EEA)	Revolut terms	Legitimate interests (opt-out available)
Google Workspace	Calendar invites (rescheduling only)	EEA/US	EU Standard Contractual Clauses (SCCs)	Contract performance

No data sales or sharing with advertisers. All transfers outside EEA use SCCs or adequacy decisions.

7. Data Retention Periods

Data Type	Retention Period	Reason	Legitimate Interests (Art. 6(1)(f))
Lesson bookings, assessments, class notes	Until account termination (your request or inactivity per Terms) + 3 months anonymized	Contract completion	N/A
Invoices, payment records	10 years	Lithuanian tax/accounting law	Service delivery, user engagement
Technical data	Wix defaults (up to 1 year)	Service improvement	N/A
Marketing contacts	Until opt-out or 2 years inactivity	Legitimate interests	N/A

After retention, data is **permanently deleted or irreversibly anonymized**. You can request access to retained invoices.

8. Your GDPR Rights

You have the following rights under GDPR Chapter III:

1. **Access** your data
2. **Rectification** of inaccurate data
3. **Erasure** („right to be forgotten“)
4. **Restriction** of processing
5. **Data portability** (structured format)
6. **Object** to processing (especially marketing)
7. **Withdraw consent** (no effect on prior processing)

8.1 How to Exercise Your Rights

Email privacy@sulikomas.com with:

- Your full name
- Specific request
- Proof of identity (if requested)

Response time: 1 month (extendable by 2 months for complex cases). No fee unless requests are excessive. We verify identity before disclosure.

Complaints: Contact ADA (www.ada.it) if unsatisfied with our response.

9. Security Measures

We implement appropriate technical and organizational measures:

1. **Encryption:** Special Wix CMS datasets for personal data
2. **Access controls:** Limited staff access only
3. **Secure payments:** Revolut embedded gateway
4. **Regular backups:** Wix infrastructure
5. **No known breaches** to date

10. Automated Emails

We send automated notifications for:

- Payment confirmations
- Session additions/cancellations/rescheduling
- Class materials availability
- Course renewals

To opt-out: Reply to any email or contact english@sulikomas.com.

11. Children's Privacy

Our services are **adults/professionals only** (age 18+). We do not knowingly collect children's data.

12. Changes to This Policy

We may update this policy. Changes appear on the Site with „Last Updated“ date. Continued use constitutes acceptance.

13. Contact Us

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Email: privacy@sulikomas.com
Phone: +370 623 41173 (WhatsApp)

For questions or appeals, contact: english@sulikomas.com
Most recent Privacy Policy is available at sulikomas.com/privacy