

Privacy Policy

Last Updated: June 2026

Arto Ofir Buskila (the "**Website Owner**") is highly committed to safeguarding your privacy.

This Privacy Policy outlines how we collect, process, manage, and protect your personal data in strict compliance with international privacy frameworks, including the General Data Protection Regulation (GDPR) for European Union residents and applicable United States privacy laws (e.g., CCPA/CPRA, ARL).

1. Information We Collect

- **Directly Provided Data:**

When an account is created or a purchase is made, we collect the name, email address, phone number, and physical shipping address for physical goods.

Because minors are prohibited from making purchases, the personal data collected during financial transactions belongs strictly to the adult legal guardian.

You warrant that all personal data provided is accurate, complete, and belongs to you or a party you are legally authorized to represent.

- **User-Generated Content (UGC) and Public Areas:**

If you participate in course forums, submit artwork, post comments, or interact with other users, any personal data you voluntarily disclose in these areas becomes public. Arto assumes no liability for the privacy, security, or third-party usage of information you freely share in such public or shared LMS spaces.

- **Automated & Usage Data:**

To enforce our single-user licenses and prevent unauthorized account sharing, we collect data via our Learning Management System (LMS) regarding course progress, video completion rates, login timestamps, device types, and IP addresses.

- **Cookies:**

We utilize essential cookies for core site functionality (such as cart processing) and, subject to your explicit consent, analytical and marketing cookies.

2. Lawful Basis for Processing (GDPR Compliance)

We process your personal data under the following lawful bases:

- **Contractual Necessity:**

To provide access to digital courses, fulfill physical product orders, and process payments.

- **Legitimate Interests:**

To monitor system usage, enforce our anti-piracy policies, protect our intellectual property, prevent fraud and improve our educational offerings.

- **Legal Obligation:**

To retain financial transaction records for tax and accounting compliance and respond to lawful legal requests.

- **Explicit Consent:**

For sending direct marketing communications and utilizing non-essential tracking cookies.

3. Data Retention

We do not store your personal data indefinitely. We retain your data only for as long as reasonably necessary to fulfill the purposes outlined in this policy. Specifically:

- **Account Data:** Retained for the duration of your active course license and archived for a period necessary to defend against legal claims or enforce intellectual property rights.
- **Financial Records:** Retained for a minimum of seven (7) years to comply with binding local and international tax and corporate laws. Following the expiration of these statutory periods, data is securely deleted or irreversibly anonymized.

4. Data Sharing and International Transfers

We do not sell your personal data for monetary compensation.

Data is shared exclusively with trusted third-party service providers (LMS hosts, secure payment processors, shipping carriers) under strict Data Processing Agreements (DPAs).

When transferring data originating from the European Economic Area (EEA) to jurisdictions not deemed "adequate" by the European Commission, we employ Standard Contractual Clauses (SCCs) to ensure your data remains protected.

All payment processing is handled by PCI-DSS compliant gateways; Arto does not store or process your full credit card information on its own servers.

Third-Party Links: Our courses and website may contain links to external websites. We are not responsible for the privacy practices, content, or security of any third-party websites.

5. Your Data Subject Rights (GDPR & US Privacy Laws)

Depending on your jurisdiction, you hold specific rights regarding your personal data:

- **Right to Access & Portability:**

Request a copy of the personal data we hold about you.

- **Right to Rectification:**

- Request corrections to inaccurate data.

- **Right to Erasure:**

Request the deletion of your personal data, subject to overriding legal retention requirements.

- **"Do Not Sell or Share My Personal Information"** (US Residents): Under laws like the CCPA/CPRA, targeted advertising may be classified as "sharing" or "selling". You may opt-out of such tracking via our cookie management settings or by contacting us.

We do not discriminate against users who exercise their privacy rights.

To exercise these rights, please contact our Data Protection team via the email provided on our platform.
We aim to respond to all verifiable requests within 30 days.

6. Minors' Privacy (COPPA & GDPR)

While the educational content may be viewed by minors, the platform does not knowingly collect personally identifiable information directly from children under the age of 13 (US) or 16 (EU) without verifiable parental consent.

All accounts must be created, managed, and paid for by a legal adult.

If we discover we have inadvertently collected data directly from a minor without parental consent, we will delete that information immediately.

7. Data Security and Limitation of Liability

We implement industry-standard technical and organizational security measures to protect your personal data from unauthorized access, alteration, disclosure, or destruction.

However, no method of transmission over the Internet or electronic storage is 100% secure. By using our services, you acknowledge and agree that Arto shall not be held liable for any unauthorized access, hacking, data loss, or data breaches caused by third parties, force majeure events, or circumstances beyond our reasonable commercial control, provided we have adhered to statutory security standards.

In the event of a security breach that poses a high risk to your personal rights and freedoms, we will notify the relevant supervisory authorities within 72 hours of becoming aware of the breach, and we **will communicate the breach to affected users without undue delay, as mandated by law.**

8. Marketing Communications

You will only receive promotional emails if you have provided explicit, opt-in consent.

You may withdraw this consent at any time by utilizing the "Unsubscribe" link included in every marketing communication.

9. Policy Updates and Contact Information

We reserve the right to amend this Privacy Policy at our discretion to reflect changes in legal requirements or business operations. Any updates will be posted on this page with a revised "Last Updated" date.

Your continued use of the website following such modifications constitutes your acceptance of the revised policy.

For any inquiries or privacy-related requests, please contact us at: art@ofirbuskila.com