Privacy Notice - ChatGPT Advertising Measurement

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Responsible organisation

Ohlala French Course is operated by El Manon Gonnard, 11 Avenue Paul Girard, 10500 Dienville, France. Contact: info@ohlalafrenchcourse.com.

Purpose and scope

With your consent, we measure whether a visit from a ChatGPT advertisement leads to the first successful payment for an Ohlala French School subscription. This helps us evaluate our advertisements. A free trial without payment is not a paid conversion. Its first successful payment can count; recurring subscription payments do not generate another acquisition event. This notice covers this advertising measurement only, rather than all processing associated with our website, accounts or payment services.

Your choice

Advertising measurement is optional and relies on your consent. You can choose Accept or Decline in the advertising measurement panel. Declining does not prevent you from browsing, purchasing, starting a trial or using your subscription. Technical identifiers record your choice and, when you agree, connect your visit to an eligible payment.

Information processed

We record your consent decision, its date and the version of the information presented. If you agree, we store an advertising click reference supplied by OpenAI. For an eligible payment while consent remains valid, our server sends OpenAI the click reference, a unique event identifier, the date and time of payment, the amount and currency, the subscription type, and the public landing page address. This event does not contain your name, email, telephone number, postal address, card details or Stripe customer and subscription identifiers. The click reference is pseudonymous, not anonymous.

Recipients and OpenAI processing

Our advertising contracting party is OpenAI Ireland Ltd., 1st Floor, The Liffey Trust Centre, 117-126 Sheriff Street Upper, Dublin 1, D01 YC43, Ireland. OpenAI receives conversion information through its Conversions API. Authorised Ohlala personnel and hosting providers can process information needed to operate the integration. Under the Conversion Terms, Ohlala and OpenAI generally act as independent controllers; OpenAI acts as a processor only for the restricted processing defined in its Ad Tools DPA. OpenAI may use conversion data to provide, measure, optimise and improve its advertising services. See https://openai.com/policies/conversion-terms/ and https://openai.com/policies/ad-tools-dpa/.

Retention

A click reference can be used for 30 days after its consented capture; withdrawal removes it earlier. Expired references are cleared during maintenance. Attribution context records become eligible for deletion 90 days after their expiry, normally about 120 days after capture. Consent records without a remaining attribution context become eligible for deletion 120 days after their last update if refused or withdrawn, or 400 days after their last update if granted. Deletion runs through scheduled maintenance. Conversion dispatch records currently have no automatic deletion deadline. Their link to the attribution context is removed when that context is deleted or a relevant erasure request is processed; this does not necessarily make all remaining transaction metadata anonymous. Contact us about their retention or erasure. OpenAI determines its own retention according to purpose, security and legal needs; see https://openai.com/policies/eu-privacy-policy/.

Withdrawing consent

Use Withdraw consent in the advertising measurement panel or contact info@ohlalafrenchcourse.com. Withdrawal prevents subsequent conversion sends associated with that consent. It does not automatically delete information already received by OpenAI or cancel a transmission already in progress. Contact us to request the exercise of your data protection rights.

International transfers

OpenAI may process data outside the European Economic Area, including in the United States. Its Ad Tools DPA assigns EEA and Swiss data to OpenAI Ireland Limited and requires a valid mechanism for onward transfers. Its privacy policy describes adequacy decisions and standard contractual clauses. Information or copies of safeguards can be requested at privacy@openai.com. See https://openai.com/policies/ad-tools-dpa/ and https://openai.com/policies/eu-privacy-policy/.

Your rights

Subject to applicable conditions, you can request access, correction, deletion, restriction or portability of your personal data. You can withdraw consent at any time. Contact info@ohlalafrenchcourse.com. You may lodge a complaint with the French data protection authority, CNIL: https://www.cnil.fr/en.

Relationship with other notices

This notice describes the optional sharing of advertising conversion information with OpenAI. It supplements the notices covering your account, subscription and payment services. No new advertising conversion is sent after withdrawal. For rights concerning information already held by OpenAI, use https://privacy.openai.com/ or contact privacy@openai.com.