

Last updated: November 2025

1. Controller and Scope

This Privacy Notice explains how *Future Prep Ltd.* processes personal data collected through the website **22Academy.com**.

Future Prep Ltd. is a company registered in Bulgaria under UIC 208497759, with its registered office at 25 Chayka Residential Complex, Entrance A, Floor 1, Apt. 2, Varna 9000, Bulgaria.

Email: info@22academy.com Phone: +359 87 535 9965.

Future Prep Ltd. operates the platform and provides course access.

Payments are processed by *Paddle.com Market Ltd.*, which acts as Merchant of Record and separate data controller for billing and payment information.

2. Data Collected

We collect and process personal data that you provide when:

- Creating or using an account on 22Academy.com.
- Purchasing a course or product (via Paddle).
- Contacting support or requesting updates.
- Registering for a newsletter or marketing email (if applicable).

Data collected may include your name, email address, login credentials, order information, and course progress data.

3. Purpose and Legal Basis

Personal data are processed to:

- Provide and manage your account.
- Deliver purchased content or services.
- Fulfil contractual and legal obligations (including tax and invoicing).
- Communicate updates, invoices, or support messages.
- Maintain site functionality and security.

Processing is based on:

- Article 6(1)(b) GDPR – contract performance.
- Article 6(1)(c) GDPR – legal obligation.
- Article 6(1)(f) GDPR – legitimate interest in managing the service.
- Article 6(1)(a) GDPR – consent, where applicable.

4. Payment Data

All payments are handled by **Paddle.com Market Ltd.** acting as Merchant of Record.

Paddle is responsible for:

- Collecting and processing payment information.
- Issuing invoices and handling VAT.
- Managing chargebacks and refunds.

Paddle processes personal data in accordance with its own privacy policy:

<https://www.paddle.com/legal/privacy>.

Future Prep Ltd. does not have access to your full payment details.

5. Cookies and Analytics

Cookies are used to ensure secure login, remember preferences, and collect anonymized statistics.

See our Cookie Policy for details.

6. Data Retention

Account data are retained while your account is active.

After a period of inactivity, data may be anonymized in accordance with our retention rules.

Purchase and invoicing data are retained as required by law.

7. Data Sharing

We share personal data only with service providers who help us operate the website, host the platform, or deliver digital content.

All providers are bound by confidentiality and comply with EU data-protection standards.

8. Your Rights

Under the GDPR, you have the right to:

- Access, correct, or delete your data.
- Restrict or object to processing.
- Withdraw consent at any time.
- Request data portability.
- File a complaint with the Bulgarian Commission for Personal Data Protection or another EU authority.

Contact info@22academy.com to exercise these rights.

9. Security

We use technical and organizational measures to protect personal data against unauthorized access, loss, or misuse.

10. Governing Law

This Privacy Notice is governed by Bulgarian law and EU data-protection rules.