

# **General Data Protection Regulation (GDPR)**

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## **A. Introduction**

1. The privacy of our website visitors is very important to us and we are committed to protecting it. This policy explains what we do with your personal information.
2. Your consent to the use of cookies in accordance with our terms and conditions on your first visit to our website allows us to use cookies on each visit to our website.

## **B. Collection of personal data**

The following types of personal data may be collected, stored and used:

1. information about your computer, including IP address, geographic location, browser type and version, and operating system;
2. information about your visits to and use of this website, including the source of the referral, length of visit, pages viewed and website pageviews;
3. information such as the email address you provide when you register on our website;
4. information you enter when you create a profile on our website - such as your name, profile pictures, gender, date of birth, status, interests and hobbies, education and occupation;
5. information such as your name and email address that you provide when you sign up for our email services and/or newsletters;
6. information you enter when you use the services on our website;
7. information generated when you use our website, including when, how often and under what conditions you use it;

8. information relating to your purchases, services used or transactions you make through our website which includes your name, address, telephone number, email address and credit card details;
9. information that you submit to our website with the intention of publishing it on the internet, including your username, profile pictures and the content of your submission;
10. information contained in any communication you send to us by email or through the Website, including the content and metadata itself;
11. any other personal information you send us.

Before you disclose another person's personal data to us, you must obtain that person's consent to both the disclosure and processing of that personal data in accordance with this Policy.

### **C. Use of your personal data**

Personal information provided to us through our website will be used for the purposes set out in this policy or on the relevant pages of the website. We may use your personal information for the following purposes:

1. managing our website and business;
2. customising our website just for you;
3. enabling you to use the services available on our website;
4. sending you goods purchased through our website;
5. providing services purchased through our website;
6. sending statements, invoices, payment reminders and collecting payments;
7. sending non-commercial commercial communications;
8. sending specifically requested email notifications;
9. sending you our email newsletter if you have requested it (you may notify us at any time if you no longer require it);
10. sending you marketing communications relating to our business or the business of carefully selected third parties that we think may be of interest to you, by post or, if you have expressly agreed to this, by email or similar technology (you can inform us at any time if you no longer require a marketing communication);
11. providing statistical information about our users to third parties (but these third parties will not be able to identify any individual user from this information);
12. dealing with queries and complaints made by you or otherwise concerning you in relation to our website;

13. maintaining the security of our website and preventing fraud;
14. verifying compliance with our website's terms of use (including monitoring private messages sent through our private messaging service); and
15. other uses.

If you submit personal information for publication on our website, we will disclose and use it in accordance with the license you provide to us.

Your privacy settings can be used to limit the disclosure of your information on our site and can be adjusted using the privacy controls on this site.

We will not provide your personal information to any third party for the purpose of direct marketing to them or any other third party without your express consent.

#### **D. Disclosure of personal data**

We may disclose your personal information to any of our employees, officers, insurance companies, professional advisors, agents, contractors or subcontractors as reasonably necessary for the purposes set out in this policy.

We may disclose your personal information to any member of our group of companies (i.e. our subsidiaries, our ultimate holding company and any of its subsidiaries) as reasonably necessary for the purposes set out in this policy.

We may disclose your personal information:

1. to the extent that we are required to do so by law;
2. in connection with any pending or future legal proceedings;
3. for the purpose of establishing, exercising or defending our legal rights (including providing information to others to prevent fraud and reduce credit risk);
4. to the purchaser (or prospective purchaser) of any business or assets that we sell (or are considering selling); and
5. to any person whom we reasonably believe may be required by a court or other competent authority to disclose such personal information and where, in our opinion, such court or authority could order the disclosure of such personal information.
6. Except as set out in this policy, we will not disclose your personal data to third parties.

Except as set out in this policy, we will not disclose your personal data to third parties.

## **E. International data transfers**

1. The data we collect may be stored, processed and transferred between any of the countries in which we operate for use in accordance with this Policy.
2. The data we collect may be transferred to the following countries that do not have data protection laws equivalent to those in the European Economic Area: the United States, Russia, Japan, China and India.
3. Personal information you post on our website or submit for publication on our website may be accessible worldwide via the Internet. We cannot prevent the use or misuse of this information by others.
4. You expressly consent to the transfers of personal information described in this Section F.

## **F. Retention of personal data**

1. This Part G sets out our data retention policies and procedures to ensure that we comply with our legal obligations to retain and delete personal data.
2. Personal data that we process for any purpose or purposes must not be retained for longer than is necessary for that purpose or purposes.
3. Without prejudice to Article G 2, we delete personal data that falls into the categories set out below by the date and time specified below:
4. the personal data will be deleted on {ENTER DATE/ TIME}; and
5. {ENTER ADDITIONAL DATES/TIMES}.
6. Notwithstanding any other provision of this Part G, we will retain documents (including electronic ones) containing personal data
  1. to the extent that we are required to do so by law;
  2. if we believe that the documents may be relevant to any pending or future legal proceedings; and
  3. for the purpose of establishing, exercising or defending our legal rights (including providing information to others for the purpose of fraud prevention and credit risk reduction).

## **G. Security of your personal data**

1. We will take reasonable technical and organisational measures to prevent the loss, misuse or alteration of your personal data.
2. We will store all personal data you provide on our secure servers (password protected and firewalled).
3. All electronic financial transactions entered through our website will be encrypted.

4. You acknowledge that the transmission of information over the Internet is inherently insecure and we cannot guarantee the security of data sent over the Internet.
5. You are responsible for maintaining the confidentiality of the password you use to access our website; we will not ask you for your password (except when you log in to our website).

## **H. Changes**

We may update this policy from time to time by posting a new version on our website. You should check this page from time to time to ensure that you understand any changes to this Policy. We may notify you of changes to this Policy by email or through private messages on our website.

## **I. Your rights**

You can instruct us to provide you with any personal information we hold about you. The provision of such information will be subject to the following:

1. payment of the fee {ENTER FEE IF RELEVANT}; and
2. production of appropriate proof of your identity ({ADJUST TEXT TO REFLECT YOUR POLICY For this purpose, we usually accept a photocopy of your passport certified by a notary public and an original copy of your utility bill showing your current address}).

To the extent permitted by law, we may refuse to provide the personal information you request.

You can instruct us not to process your personal data for marketing purposes at any time.

In practice, you will usually either explicitly agree in advance to our use of your personal data for marketing purposes or we will offer you the opportunity to opt out of our use of your personal data for marketing purposes.

## **J. Third party websites**

Our website contains hyperlinks to and details of third party websites. We have no control over and are not responsible for the privacy policies and practices of third parties.

## **K. Updates to data**

Please let us know if the personal information we hold about you needs to be corrected or updated.

## L. Cookies

Our website uses cookies. A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and stored by the web browser. This identifier is then sent back to the server whenever the browser requests the server to display a page. Cookies can be either "persistent" or "session". Persistent cookies will be stored by the web browser and remain valid until their expiry date, unless they are deleted by the user before the expiry date. In contrast, session cookies expire at the end of the user's session when the web browser is closed. Cookies do not normally contain any information that uniquely identifies the user, but the personal information we store about you may be linked to the information stored and retrieved from cookies. {SELECT ACCURATE PHRASING We use only session cookies / only persistent cookies / both session and persistent cookies on our website.}

1. The names of the cookies we use on our website and the reasons for using them are set out below:
  1. We use Google Analytics and Adwords on our website to recognize your computer and {INCLUDE ALL USES THAT COOKIES ARE USED FOR ON YOUR SITE when a user visits the website / track user movement on our website / enable the use of the shopping cart on the website / improve website usability / analyze website usage / administer the website / prevent fraud and improve website security / customize the website for each user / target advertising, according to the individual interests of specific users / describe the reason(s)};
2. Most browsers allow you to refuse to accept cookies - for example:
  1. In Internet Explorer (version 10), you can block cookies by changing the cookie handling settings available by clicking on "Tools", "Internet Options", "Privacy" and then "Advanced";
  2. in Firefox (Version 24), you can block all cookies by clicking on "Tools", "Options", "Privacy", then selecting "Use custom history settings" from the drop-down menu and unchecking the "Accept cookies from websites" checkbox; and
  3. in Chrome (version 29), you can block all cookies in the "Customize and Control" menu, where you click "Settings", "Show advanced settings" and "Content settings", then select "Block sites from setting any data" under the "Cookies" heading.

Blocking all cookies will have a negative impact on the usability of many websites. If you block cookies, you will not be able to use all the features on our website.

3. You can delete cookies already stored on your computer - for example:
  1. in Internet Explorer (version 10) you must delete cookies manually (instructions on how to do this can be found here: <http://support.microsoft.com/kb/278835>);
  2. in Firefox (Version 24), you can delete cookies by clicking on "Tools", "Options" and "Privacy", then selecting "Use custom history settings", clicking on "View cookies" and then clicking on "Delete all cookies"; and
  3. in Chrome (version 29), you can delete all cookies by going to the "Customize and Control" menu, clicking on "Settings", "View Advanced Settings" and "Clear Browser Data" before clicking on "Clear Browser Data" and selecting "Delete cookies and other site and extension data".
4. Deleting cookies will have a negative impact on the usability of many websites.