

General Data Protection (GDPR)

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A. Introduction

1. The privacy of visitors of our website is very important to us and we are committed to protecting it. This policy explains what we do with your personal data.
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 each time you visit our website.

B. Acknowledgements

This document was created using a template from SEQ Legal (seqlegal.com) and adapted by Website Planet (www.websiteplanet.com).

C. Collection of personal data

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

1. information about your computer, including your IP address, geographic location, browser type and version and operating system;
2. information about your visits to this website and the use of it, including the source of the referral, length of visit, pages viewed, and website traversal;
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 - for example, 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 provide when using the services on our website;
7. information generated while using 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 posting;
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 provide us with another person's personal information, you must obtain that person's consent to both the disclosure and processing of that personal information in accordance with this Policy.

D. Use of your personal information

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. the administration of our website and business;
2. customizing 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 business communications;
8. sending specifically requested email announcements;
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 the 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 enquiries and complaints made by you or relating to you in any other way in connection with our website;
13. maintaining the security of our website and preventing fraud;
14. verifying compliance with the terms of use of our website (including monitoring private messages sent through our private messaging service); and
15. other uses.

If you submit personal information for disclosure 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 settings controls on this Site. We will not provide your personal information to any third party for the purpose of direct marketing by them or any other third party without your express consent.

E. Disclosing 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 forth 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 data:

1. to the extent 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 for fraud prevention and credit risk reduction);
4. to the purchaser (or future 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.

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

F. 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 force in the European Economic Area: the United States of America, Russia, Japan, China and India.
3. Personal information that you disclose 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.

G. Personal data retention

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 fall into the categories set out below by the date and time specified below:
 1. Personal data will be deleted as soon as it is no longer necessary to achieve the purpose for which it was collected.
 2. Notwithstanding any other provision of this Part G, we will retain documents (including electronic ones) containing personal data to the extent that we are required to do so by law;
 3. if we believe that the documents may be relevant to any pending or future legal proceedings; and
 4. 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).

H. 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 transfer 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).

I. Changes

We may update this Policy from time to time by publishing 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.

J. Your Rights

You may direct us to provide you with any personal information we have about you. Disclosure of such information will be subject to the following:

- To the extent permitted by law, we may refuse to provide the personal information you request.
- You may direct us not to process your personal information for marketing purposes at any time.
- In practice, you will usually either explicitly agree to our use of your personal data for marketing purposes in advance or we will offer you the opportunity to unsubscribe from our using your personal data for marketing purposes.

K. 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.

L. Data updates

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

M. 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 after 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. We use both session and persistent cookies on our website.

The names of the cookies we use on our website and the reasons for their use are set out below:

- we use Google Analytics and Adwords to recognise a computer using cookies on the user's side when the user visits a website
- tracking the user's movements on our website

- enabling the use of the shopping cart on the website
- improving the usability of the website
- analysing the use of the website
- administering the website
- preventing fraud and improving website security
- customising the website for each user
- targeted advertising, according to the individual interests of specific users;

Most browsers allow you to refuse the acceptance of cookies – for example:

1. in Internet Explorer (version 10) you can block cookies by changing the cookie processing 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 by going to the "Customization and Controls" menu, clicking "Settings", "View Advanced Settings", and "Content Settings", then selecting "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 features on our website.

You can delete cookies already saved 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 "Customization and Controls" 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".

Deleting cookies will have a negative impact on the usability of many websites.