

# Privacy Policy

Simply-You Counselling . and its affiliates ("Simply-You " or "we") are committed to respecting your online privacy and recognizes your need for appropriate protection and management of any personally identifiable information ("Personal Information") you share with us. Simply-You has established this Privacy Policy to let you know what information we may collect from you on the publicly available portion of TwistedSpire.co.uk (the "Site") and how we may use and share that information. By using the Site, you agree to accept the terms of our Privacy Policy. If you do not agree to the terms of this Privacy Policy, please do not use the Site. This Privacy Policy applies only to information that we collect on or through the Site and does not apply to information we collect on behalf of advertisers to which we provide our advertising services. A description of the information we collect on behalf of our advertiser clients through our advertising services is set out in our Notice of Marketing Practices.

## PERSONAL INFORMATION WE MAY COLLECT

Personal Information means any information that may be used to identify an individual, including, but not limited to, a first and last name, a home, business, or other physical address, a phone number, and an email address. In general, we only collect Personal Information from our Site users in connection with inquiries about our services through the "Contact" page. Such Personal Information may include the following:

- Your First Name and Last Name
- Your Profession
- The Name and Size of your Business
- Your Telephone Number
- Your Email Address
- The Product that you are interested in your website URL

As a Simply-You advertiser customer, you will obtain access to our advertising portal Simply-You Platform by means of login on our website. Your Personal Information will be stored in Simply-You Platform and will only be used by us to provide you with our services and to organise and administer our contractual relationship with you. In addition to the Personal Information set out above, this Personal Information may include the following:

- Your Address (residence and/or business)
- Your password and the user name as selected by you
- Your Payment Information (account number and/or credit card number, expiry date and security code)
- Your Date Of Birth
- Information on the services provided by us, including the level of performance of your advertising campaigns.

## **SENSITIVE DATA**

Simply-You does not seek to collect sensitive personal data (such as data revealing political opinions, religious beliefs, health or other matters) through this Site. Please note that by providing Simply-You with unsolicited sensitive personal data you (explicitly) consent to our use of said data as described above.

## **HOW WE MAY USE YOUR INFORMATION**

We may retain and use your Personal Information for the following purposes:

- To fulfil requests for products or services
- To conduct research and improve our services
- To send you communications (as set out below)

We reserve the right to send you certain communications relating to the Site or the services provided by Simply-You, such as service announcements, e-mails related to your account, or similar administrative or transactional messages. We will use your Personal Information to contact you, should you have consented to receiving marketing communications or to the extent permitted under applicable law. To the extent any of such marketing material is sent to you by email, you will always be offered the opportunity to opt-out of receiving them by clicking the relevant opt-out link as provided in each email.

## **WITH WHOM WE MAY SHARE YOUR INFORMATION**

We may also permit selected third parties and agents to use your Personal Information, for the purposes set out in the preceding sections who will be subject to obligations to process such information in compliance with the same safeguards that we deploy.

If false or inaccurate information is provided and fraud is identified or suspected, details may be passed to fraud prevention agencies or other third parties and may be recorded by us or by them. This information may be accessed by law enforcement agencies from other countries.

If Simply-You (or a part thereof) is (i) subject to negotiations for the sale of its business or (ii) is sold to a third party or undergoes a re-organisation, you agree that any of your Personal Information which it holds may be disclosed to such party (or its advisors) as part of any due diligence process or transferred to that re-organised entity or a third party and used for the same purposes or to analyse any proposed sale or re-organisation

We may disclose your Personal Information to third parties, the court service and/or regulators or law enforcement agencies in connection with enquiries, proceedings or investigations by such parties anywhere in the world or to enable Simply-You to comply with its regulatory requirements or dialogue with its regulators as applicable.

## **COOKIES AND OTHER TRACKING TECHNOLOGIES**

Our Cookies Policy sets out how we use cookies and other tracking technologies in connection with your use of this Site. Use of any Personal Information collected through those technologies will be subject to the terms of this Privacy Policy.

If you wish to opt-out of the use of your information collected using the tracking technologies as described above, you may do so under the Cookies Policy.

## **LINKS TO OTHER SITES**

Please be aware that when you are on the Site, you could be directed to other sites that are beyond our control via hyperlinks. For example, if you choose to use the Simply-You Directory at the Site, you may be sent to a third-party website if you click on a hyperlink. These other websites may send their cookies to visitors, collect data, or solicit Personal Information. The privacy policies of these other sites may be significantly different from this Privacy Policy. We are not responsible for the privacy practices of these other sites and cannot guarantee the security of any of your Personal Information collected there.

## **TRANSMISSION, STORAGE AND SECURITY OF YOUR PERSONAL INFORMATION**

No data transmission over the Internet or website can be guaranteed to be secure from intrusion. However, we maintain commercially reasonable physical, electronic and procedural safeguards to protect your Personal Information under applicable data protection legislative requirements.

All your information is stored on our secure servers (or secure hard copies) and accessed and used subject to our security policies and standards. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential and for complying with any other security procedures that we notify you of. We ask you not to share a password with anyone.

Your Personal Information may be accessed by staff or suppliers in, transferred to, and/or stored at, a destination outside the United Kingdom and the European Economic Area (EEA) in which data protection laws may be of a lower standard than in the EEA. Regardless of location or whether the person is an employee or contractor we will impose the same data protection safeguards that we deploy inside the EEA and within the United Kingdom.

We will retain your Personal Information for as long as is necessary for the processing purpose for which they were collected. Certain details and correspondence may be retained until the time limit for any legal challenges has expired or to comply with regulatory requirements regarding the retention of such data. Data may also be retained for, or included in, analysis carried out by Simply-You concerning its own business.

## **CHILDREN'S PRIVACY**

This Site is not intended for use by children under 16. We do not knowingly collect Personal Information from anyone under 16 years of age. If we become aware that we have unknowingly collected Personal Information from a child under the age of 16, we will make commercially reasonable efforts to delete such information from our database.

## **CHANGES TO OUR PRIVACY POLICY**

The terms of this Privacy Policy may change from time to time. We will notify you of any material changes to this Privacy Policy by posting a notice on the homepage of the Site for a reasonable period after such changes are made that this Privacy Policy has been updated and by changing the "Last Modified" date at the top of this Privacy Policy. We encourage you to check this page periodically for any changes. Your continued use of the Site following the posting of changes to these terms will mean you accept those changes.

## **GOVERNING LAW**

Simply-You makes no representation that this Privacy Policy and such practices comply with the laws of any other country than the United Kingdom. Visitors who use the Site and reside outside the United Kingdom do so on their initiative and are responsible for compliance with local laws, if and to the extent local laws are applicable. If you reside outside of the United Kingdom, by using our Site, you consent to the transfer and use of your information outside your country.

## **CONTACTING US**

If you have any comments or questions regarding our Privacy Policy, please contact us at [info@twistedspire.co.uk](mailto:info@twistedspire.co.uk)