



Privacy Policy

November 2021 | Version 1.0

1. Introduction

We are Regarding My Life (Registration number 2020/796651/07) and this policy is our plan of action to protect your privacy.

We respect your privacy and take the protection of personal information seriously. The purpose of this policy is to describe the way that we collect, store, use, and protect information that can be associated with you or another specific natural or juristic person and can be used to identify you or that person (**personal information**).

2. Audience

This policy applies to you if you are:

- a visitor to our website;
- a registered user on our website; or
- a prospect or customer who has ordered or requested the goods or services that we provide.

3. What is personal information?

Personal information includes:

- certain information that we collect automatically when you visit our website;
- certain information collected on registration (see below);
- certain information collected on submission; and
- optional information that you provide to us voluntarily (see below);

but excludes:

- information that has been made anonymous so that it does not identify a specific person;
- permanently de-identified information that does not relate or cannot be traced back to you specifically; and
- non-personal statistical information collected and compiled by us.

Common examples

Common examples of the personal information that we may collect and process include your:

- **identifying information** – such as your name, date of birth, or identification number of any kind;
- **contact information** – such as your phone number or email address;
- **address information** – such as your physical or postal address; or
- **demographic information** – such as your gender or marital status.

Sensitive personal information

Depending on the goods or services you require, we may also collect sensitive personal information including your:

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- **sensitive demographic information** – such as your race or ethnicity; and
- **employment information** – including your membership of a trade union.

4. Acceptance, legal capacity, and your obligations

Acceptance required

You must accept all the terms of this policy when you order our goods or request our services. If you do not agree with anything in this policy, then you may not order our goods or request our services.

Deemed acceptance

By accepting this policy, ordering our goods, or requesting our services, we deem you to have read, understood, accepted, and agreed to be bound by all of its terms.

Legal capacity

You may not access our website or order our goods or request our services if you are younger than 18 years old or do not have legal capacity to conclude legally binding contracts.

Your obligations

You may only send us your personal information or of another data subject where you have their permission to do so.

5. How do we collect personal information?

On registration

When you submit an enquiry or if you register on our website, you will no longer be anonymous to us.

On order or request

When you order our goods or request our services, you will be asked to provide us with additional information on a voluntary basis (**goods or services information**).

Events

You will provide us with personal information when you attend an event that we host.

From browser

We automatically receive and record Internet usage information on our server logs from your browser, such as your Internet Protocol address (**IP address**), browsing habits, click patterns, version of software installed, system type, screen resolutions, colour capabilities, plug-ins, language settings, cookie preferences, search engine keywords, JavaScript enablement, the content and pages that you access on the website, and the dates and times that you visit the website, paths taken, and time spent on sites and pages within the website (**usage information**). Please note that other websites visited before entering our website might place personal information within your URL during a visit to it, and we have no control over such websites. Accordingly, a subsequent website that collects URL information may log some personal information. We are not responsible for any URL information.

Cookies

For information on how we deal with cookies, please refer to our Cookies Policy.

Web beacons

Our website may contain electronic image requests (called a **single-pixel gif** or **web beacon** request) that allow us to count page views and access cookies. Any electronic image viewed as part of a web page (including an ad banner) can act as a web beacon. Our web beacons do not collect, gather, monitor or share any of your personal information. We merely use them to compile anonymous information about our website.

Optional details

You may also provide additional information to us on a voluntary basis (**optional information**). This information includes content or products that you decide to upload or download from our website or when you enter competitions, take advantage of promotions, respond to surveys, order certain additional goods or request additional services.

Recording calls

We may monitor and record any telephone calls that you make to us, unless you specifically request us not to do so.

6. Purpose for processing

We may use or process any goods or services information, or optional information that you provide to us for the purposes that you indicated when you agreed to provide it to us. Processing includes gathering your personal information, disclosing it, and combining it with other personal information. We generally collect and process your personal information for various purposes, including:

- **goods or services purposes** – such as collecting orders or requests for and providing our goods or services;
- **marketing purposes** – such as pursuing lawful related marketing activities;
- **business purposes** – such as internal audit, accounting, business planning, and joint ventures, disposals of business, or other proposed and actual transactions; and
- **legal purposes** – such as handling claims, complying with regulations, or pursuing good governance.

We may use your usage information for the purposes described above and to:

- remember your information so that you will not have to re-enter it during your visit or when you next access the website;
- monitor website usage metrics such as total number of visitors and pages accessed; and
- track your entries, submissions, and status in any promotions or other activities in connection with your use of the website.

Consent to collection

If the law requires, we will obtain your consent to collect personal information:

- in accordance with applicable law; or
- when you provide us with any registration information or optional information.

7. Use

Our obligations

We may use your personal information to fulfil our obligations to you.

Messages and updates

We may send administrative messages and email updates to you about the website. In some cases, we may also send you primarily promotional messages. You can choose to opt-out of promotional messages.

Targeted content

While you are logged into the website, we may display targeted adverts and other relevant information based on your personal information. In a completely automated process, computers process the personal information and match it to adverts or related information. We never share personal information with any advertiser unless you specifically provide us with your consent to do so.

Advertisers receive a record of the total number of impressions and clicks for each advert. They do not receive any personal information. If you click on an advert, we may send a referring URL to the advertiser's website identifying that a customer is visiting from the website. We do not send personal information to advertisers with the referring URL. Once you are on the advertiser's website, however, the

advertiser can collect your personal information. We are not responsible for the event where they collect personal information.

8. Reasons we share personal information

We may share your personal information with:

- other divisions or companies within the group of companies to which we belong:
 - to provide joint content and services like registration,
 - for transactions and customer support,
 - to help detect and prevent potentially illegal acts and violations of our policies, and
 - to guide decisions about our products, services, and communications (they will only use this information to send you marketing communications if you have requested their goods or services);
- an affiliate, in which case we will—if possible—require the affiliates to honour this privacy policy;
- our goods or services providers under contract who help provide certain goods or services or help with parts of our business operations, including fraud prevention, bill collection, marketing, technology services (our contracts dictate that these goods or services providers only use your information in connection with the goods or services they supply or services they perform for us and not for their own benefit);
- credit bureaus to report account information, as permitted by law;
- banking partners as required by credit card association rules for inclusion on their list of terminated merchants (if you utilise the services to receive payments and you meet their criteria); and
- other third parties who provide us with relevant services where appropriate.

Regulators

We may disclose your personal information as required by law or governmental audit.

Law enforcement

We may disclose personal information if required:

- by a subpoena or court order;
- to comply with any law;
- to protect the safety of any individual or the general public; and
- to prevent violation of our any of our legal terms.

No selling

We will not sell personal information or disclose it to anyone except as provided in this policy.

Marketing purposes

We may disclose aggregate statistics (information about the website visitor, prospect, or customer population in general terms) about the personal information to advertisers or business partners.

Personnel

We may need to disclose personal information to our personnel that require the personal information to do their jobs. These include our management, human resources, accounting, audit, compliance, information technology, or other personnel.

Change of ownership

If we undergo a change in ownership, or a merger with, acquisition by, or sale of assets to, another entity, we may assign our rights to the personal information we process to a successor, purchaser, or separate entity. We may disclose the transfer on the website. If you are concerned about your personal information migrating to a new owner, you may ask us to delete your personal information.

9. Security

We take the security of personal information very seriously and always do our best to comply with applicable data protection laws. Our hosting company will host our website in a secure server environment that uses a firewall and other advanced security measures to prevent interference or access from outside intruders. We implement disaster recovery procedures where appropriate.

10. Accurate and up to date

We will try to keep the personal information we collect as accurate, complete and up to date as is necessary for the purposes defined in this policy. From time to time, we may ask you to update your personal information via the website. You can review or update any personal information that we hold on you (or third parties that you have lawfully and permissibly provided to us) by accessing your account online, emailing us, or phoning us. Please note that to protect you better and safeguard your personal information, we take steps to verify your identity before granting you access to your account or making any corrections to personal information.

11. Retention

We will only retain your personal information for as long as it is necessary to fulfil the purposes explicitly set out in this policy, unless:

- retention of the record is allowed, required, or authorised by law; or
- you have consented to the retention of the record.

During retention, we will continue to abide by our non-disclosure obligations and will not sell your personal information.

We may retain your personal information in physical or electronic records at our discretion.

12. Transfer to another country

We may transmit or transfer personal information outside of the country in which it was collected to a foreign country and process it in that country. Personal information may be stored on servers located outside the country in which it was collected. The storage destination may be a foreign country whose personal information laws may not be as stringent as the laws in the country in which it was collected. We will obtain your consent where we intend to transfer your personal information across a country border.

13. Your rights

Request what information we hold on you

You may request access to your personal information to receive a copy of the personal information that we hold on you.

Updating or removing

You may choose to correct or update the personal information you have submitted to us, by clicking the relevant menu in any of the pages on our website or contacting us by phone or email.

Withdrawal of consent or objection to processing

You may withdraw your consent where we are relying on consent as a lawful justification to process. You may also object to our processing where we are relying on another lawful justification for processing. Please note that if you do so, we might not be able to provide goods or services to you.

We may need to request additional information from you to verify your identity for you to access these rights. This measure is to ensure that your personal information is not disclosed to an unauthorised person.

14. Changes

We may change the terms of this policy at any time by updating this web page. We will notify you of any changes by placing a notice in a prominent place on the website or by sending you an email detailing the changes that we have made and indicating the date that they were last updated.

If you do not agree with the changes, then you must stop using the website and our goods or services. If you continue to use the website or our goods or services following notification of a change to the terms, the changed terms will apply to you and we will deem you to have accepted the updated terms.

15. Limitation

We are not responsible for, give no warranties, nor make any representations in respect of the privacy policies or practices of linked or any third-party websites.

16. Enquiries

If you have any questions or concerns arising from this privacy policy or the way in which we handle personal information, please contact us via privacy@regardingmylife.com.