

Privacy Policy

<https://www.45minutes.me/privacy>

Last update as of 08 April 2020

This Privacy Policy describes the data protection practices of 45MINUTES.ME Limited (“45MINUTES.ME” “we,” “us,” or “our”). This Privacy Policy applies to information that we collect and use about you when you access or use the 45MINUTES.ME platform, its website, payment processing, information services or other online or mobile service that links to or otherwise presents this Privacy Policy to you. We refer to these services collectively as the “Services.”

PLEASE READ THIS PRIVACY POLICY CAREFULLY TO UNDERSTAND HOW WE HANDLE YOUR INFORMATION. IF YOU DO NOT AGREE TO THIS PRIVACY POLICY, PLEASE DO NOT USE THE 45MINUTES.ME PLATFORM AND SERVICES.

1. INFORMATION WE COLLECT

We collect information about you through the means discussed below. Please note that we need certain types of information so that we can provide the Services to you. If you do not provide us with such information, or ask us to delete it, you may no longer be able to access or use the Services.

Please also note that in order to provide the Services we work with certain third-party service providers (which are independent third-party companies), and that in this context the following third-party service provider privacy policies apply:

- <https://www.shopify.com/legal/privacy>
- <https://www.conversionbear.com/privacy-policy>
- <https://webkul.com/privacy-policy/>
- <https://www.zendesk.de/company/customers-partners/privacy-policy/>
- <https://boosterapps.com/privacy>
- <https://mailchimp.com/legal/>
- <https://policies.google.com/privacy?hl=en-GB&gl=uk>
- <https://vimeo.com/privacy>

1.1 Information You Provide to Us

We collect a variety of information that you provide directly to us. For example, we collect information from you through:

- The Services you use or processing your orders
- Requests or questions you submit to us via online forms, e-mail, or otherwise
- Your participation in surveys
- Any reviews or ratings that you submit about the Services

- Uploads or posts to the Services
- Requests for customer support and technical assistance

Information about you. While parts of the Services may not require you to provide any information that can directly identify you by name, the specific types of information we collect will depend upon the Services you use, how you use them, and the information you choose to provide. The types of data we collect directly from you include:

- E-mail address
- Name
- Billing information, such as billing address, credit or debit card number, verification number, and expiration date
- Information about purchases or other transactions with us
- Information about your customer service interactions with us
- Demographic information such as your gender or other information you choose to provide
- User-generated content you provide to us, such as when you comment on content on the Services, respond to a survey request, provide ratings, or participate in the public forums
- Sessions you book
- Any other information you choose to directly provide to us in connection with your use of the Services

1.2 Information We Collect Through Automated Means

When you use our Services, we as well as our service providers collect certain information as described in this Privacy Policy. As discussed further below, we and our service providers may use a variety of technologies, including cookies and similar tools, to assist in collecting this information.

Websites. When you use our website, we may collect and analyse information such as your IP address, browser types, browser language, operating system, software and hardware attributes (including device IDs) referring and exit pages and URLs, the number of clicks, pages viewed and the order of those pages, date and time of use, content watched, total minutes watched, error logs, and other similar information about how you use the website.

Location Information. When you use the Services, we and our service providers may automatically collect general location information (e.g., IP address, city/state and or postal code associated with an IP address) from your computer or mobile device.

1.3 Information We Collect from Others

We may receive additional information such as demographic and statistical information from third parties, such as business partners, marketers, researchers, analysts, and other parties that we may attribute to you based on your assignment to certain statistical groups. We use this information to supplement the information that we collect directly from you in order to derive your possible interests and to provide more relevant experiences for you and improve our Services, analytics, and advertising.

2. HOW WE USE YOUR INFORMATION

We, or our service providers, use your information for various purposes depending on the types of information we have collected from and about you, in order to:

- Complete a booking or provide the Services you have requested, including invoicing and accounting
- Respond to your request for information and provide you with more effective and efficient customer service
- Provide you with updates and information our Services
- Customize the advertising and content you see on the Services
- Help us better understand your interests and needs, and improve the Services, including through research and reports, and test and create new products, features, and services
- Secure our websites and applications, and resolve app crashes and other issues being reported
- Comply with any procedures, laws, and regulations which apply to us where it is necessary for our legitimate interests or the legitimate interests of others
- Establish, exercise, or defend our legal rights where it is necessary for our legitimate interests or the legitimate interests of others

Combined Information. For the purposes discussed in this Privacy Policy, we may combine the information that we collect through the Services with information that we receive from other sources, both online and offline, and use such combined information in accordance with this Privacy Policy.

Aggregate/Anonymous Data. We may aggregate and/or anonymize any information collected through the Services so that such information can no longer be linked to you or your device. We may use such information for any purpose, including without limitation for research and marketing purposes, and may also share such data with any third parties, including advertisers, promotional partners, and sponsors.

3. COOKIES AND SIMILAR TECHNOLOGIES

To collect the information in the “Information We Collect Through Automated Means” section above, we and our service providers use Internet server logs, cookies, tracking pixels, and other similar tracking technologies. We use these technologies in order to offer you a more tailored experience in the future, by understanding and remembering your browsing preferences. Cookies are small text files that are placed on your computer or mobile device when you visit a site that enable us to: (i) recognize your computer; (ii) store your preferences and settings; (iii) understand the web pages of the Services you have visited; (iv) enhance your user experience by delivering and measuring the effectiveness of content and advertising tailored to your interests; (v) perform searches and analytics; and (vi) assist with security and administrative functions. Some cookies are placed in your browser cache while those associated with Flash technologies are stored with your Adobe Flash Player files.

As we adopt additional technologies, we may also gather information through other methods. Please note that you can change your settings to notify you when a cookie is being set or updated or to block cookies altogether. Please consult the “Help” section of your browser for more information (e.g., Internet Explorer; Google Chrome; Mozilla Firefox; or Apple Safari). You can also manage the use of Flash technologies, including flash cookies and local storage objects, with the Flash management tools available at Adobe's website. Please note that by

blocking, disabling, or managing any or all cookies, you may not have access to certain features or offerings of the Services.

4. ONLINE ANALYTICS AND ADVERTISING

4.1 Analytics

We may use third-party web analytics services (such as those of Google Analytics) on our Services to collect and analyse usage information through cookies and similar tools; engage in auditing, research, or reporting; assist with fraud prevention; and provide certain features to you. To prevent Google Analytics from using your information for analytics, you may install the Google Analytics Opt-out Browser Add-on by [clicking here](#).

If you receive an e-mail from us, we may use certain analytics tools, such as clear GIFs to capture data such as when you open our message or click on any links or banners our e-mail contains. This data allows us to gauge the effectiveness of our communications and marketing campaigns.

4.2 Online Advertising

The Services may integrate third-party advertising technologies that allow for the delivery of relevant content and advertising on the Services, as well as on other websites you visit and other applications you use. The ads may be based on various factors such as the content of the page you are visiting, information you enter such as your age and gender, your searches, demographic data, user-generated content, and other information we may collect from you. These ads may be based on your current activity or your activity over time and across other websites and online services and may be tailored to your interests.

Third parties may also place cookies or other tracking technologies on your computer, mobile device, or other device to collect information about you as discussed above. These third parties (e.g., ad networks and ad servers such as Google Analytics, DoubleClick and others) may also serve tailored ads to you as you use the Internet and Internet-connected applications, and access their own cookies or other tracking technologies on your computer, mobile device, or other device you use to access the Services to assist in this activity.

We neither have access to, nor does this Privacy Policy govern, the use of cookies or other tracking technologies that may be placed on your device you use to access the Services by such non-affiliated third parties.

5. HOW WE SHARE AND DISCLOSE YOUR INFORMATION

We will share your information in the following ways:

Service Providers. We provide access to or share your information with select third parties who perform services on our behalf. They have access to perform these services but are prohibited from using your information for other purposes. They provide a variety of services to us, including billing, sales, marketing, product content and features, advertising, analytics, research, customer service, data storage, security, fraud prevention, payment processing, and legal services.

Protection of 45MINUTES.ME and Others. By using the Services, you acknowledge and agree that we may access, retain and disclose the information we collect and maintain about you if required to do so by law or in a good faith belief that such access, retention or disclosure is reasonably necessary to: (a) comply with legal process (e.g. a subpoena or court order); (b) enforce our General Terms of Use, our Host Terms and Conditions, this Privacy Policy, or other contracts with you, including investigation of potential violations thereof; (c) respond to claims that any content violates the rights of third parties; (d) respond to your requests for customer service; and/or (e) protect the rights, property or personal safety of 45MINUTES.ME, its agents and affiliates, its users and/or the public. This includes exchanging information with other companies and organizations for fraud protection, and spam/malware prevention, and similar purposes.

Business Transfers. As we continue to develop our business, we may buy, merge, or partner with other companies. In such transactions (including in contemplation of such transactions), user information may be among the transferred assets. If a portion or all of our assets are sold or transferred to a third-party, customer information (including your e-mail address) would likely be one of the transferred business assets. If such transfer is subject to additional mandatory restrictions under applicable laws, we will comply with such restrictions.

Public Forums. Certain features of our Services may make it possible for you to share comments publicly with other users. Any information that you submit through such features is not confidential, and we may use it for any purpose (including in testimonials or other marketing materials). Any information you post openly in these ways will be available to the public at large and potentially accessible through third-party search engines. Accordingly, please take care when using these features.

Aggregate/Anonymous Information. From time to time, we may share Aggregate/Anonymous Information about use of the Services, such as by publishing a report on usage trends. The sharing of such data is unrestricted.

6. RETENTION OF YOUR INFORMATION

We keep your information for no longer than necessary for the purposes for which it is processed. The length of time for which we retain information depends on the purposes for which we collected and use it and/or as required to comply with applicable laws.

7. HOW WE PROTECT YOUR INFORMATION

45MINUTES.ME takes technical and organizational security measures to protect the information provided via the Services from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. However, no Internet or e-mail transmission is ever fully secure or error free. Please keep this in mind when disclosing any information to 45MINUTES.ME via the Internet.

8. THIRD PARTY LINKS AND FEATURES

The Services may contain links to third-party websites such as social media sites, as well as third-party plug-ins. If you choose to use these sites or features, you may disclose your information not just to those third parties, but also to their users and the public more generally depending on how their services function. We are not responsible for the content or practices

of those websites or services. The collection, use, and disclosure of your information will be subject to the privacy policies of such third-party websites or services, and not this Privacy Policy. We urge you to read the privacy and security policies of these third parties.

9. CHILDREN’S PRIVACY

If we become aware that we have inadvertently collected and processed “personal information” (as defined by the applicable online privacy laws and regulations) from children without valid parental consent, we will take reasonable steps to delete it as soon as possible. We do not knowingly process data of EU residents under the age of 16 without parental consent. We also comply with other age restrictions and requirements in accordance with applicable local laws.

10. DATA SUBJECT RIGHTS AND CHOICES

Depending on your jurisdiction of residence, you may have certain rights with respect to your information as further described in this section.

Your Legal Rights. If you would like further information in relation to your legal rights under applicable law or would like to exercise any of them, please contact us using the information in the “Contact Information” section below at any time. Your local laws (e.g., in the EU) may permit you to request that we:

- provide access to and/or a copy of certain information we hold about you
- prevent the processing of your information for direct-marketing purposes (including any direct marketing processing based on profiling)
- update information which is out of date or incorrect
- delete certain information which we are holding about you
- restrict the way that we process and disclose certain of your information
- transfer your information to a third-party service provider
- revoke your consent for the processing of your information

We will consider all requests and provide our response within the time period stated by applicable law. Please note, however, that certain information may be exempt from such requests in some circumstances, which may include if we need to keep processing your information for our legitimate interests or to comply with a legal obligation. We may request you provide us with information necessary to confirm your identity before responding to your request.

11. LEGAL BASES FOR USE OF YOUR INFORMATION

The legal bases for using your information as set out in this Privacy Policy are as follows:

- where use of your information is necessary to perform our obligations to provide the Services to you;
- where use of your information is necessary for our legitimate interests or the legitimate interests of others;
- where we are required to process information in accordance with an EU Member State legal obligation; or
- where we have your consent, in accordance with applicable law.

12. CHANGES TO OUR PRIVACY POLICY

We reserve the right to amend this Privacy Policy at any time to reflect changes in the law, our data collection and use practices, the features of our Services, or advances in technology. We will make the revised Privacy Policy accessible through our Services, so you should review the Privacy Policy periodically. You can know if the Privacy Policy has changed since the last time you reviewed it by checking the date of "Last update" included at the beginning of the document. If we make a material change to the Policy, you will be provided with appropriate notice in accordance with legal requirements. By continuing to use the Services, you are confirming that you have read and understood the latest version of this Privacy Policy.

13. CONTACT INFORMATION

Please feel free to contact us if you have any questions about this Privacy Policy or the information practices of the Services under e-mail: notices@45minutes.com.