



Privacy Policy

This Privacy Policy describes how sparksmena.com (the “Site” or “we”) collects, uses, and discloses your Personal Information when you visit or make a purchase from the Site.

Contact

After reviewing this policy, if you have additional questions, want more information about our privacy practices, or would like to make a complaint, please contact us by e-mail at stuart@sparksmena.com.

Collecting Personal Information

When you visit the Site, we collect certain information about your device, your interaction with the Site, and information necessary to process your purchases. We may also collect additional information if you contact us for customer support. In this Privacy Policy, we refer to any information about an identifiable individual (including the information below) as “Personal Information”. See the list below for more information about what Personal Information we collect and why.

- Device information
 - **Purpose of collection:** to load the Site accurately for you, and to perform analytics on Site usage to optimize our Site.
 - **Source of collection:** Collected automatically when you access our Site using cookies, log files, web beacons, tags, or pixels
 - **Disclosure for a business purpose:** shared with our processor Shopify
 - **Personal Information collected:** version of web browser, IP address, time zone, cookie information, what sites or products you view, search terms, and how you interact with the Site
- Order information
 - **Purpose of collection:** to provide products or services to you to fulfill our contract, to process your payment information, arrange for shipping, and provide you with invoices and/or order confirmations, communicate with you, screen our orders for potential risk or fraud, and when in line with the preferences you have shared with us, provide you with information or advertising relating to our products or services.
 - **Source of collection:** collected from you.
 - **Disclosure for a business purpose:** shared with our processor Shopify and HubSpot for CRM
 - **Personal Information collected:** name, billing address, shipping address, payment information (including credit card numbers, email address, and phone number.
- Customer support information
 - **Purpose of collection:** to provide customer support.
 - **Source of collection:** collected from you

- **Disclosure for a business purpose:** shared with our processor Shopify and HubSpot for CRM
- **Personal Information collected:** *Your name, email address and phone number if you provide it through our contact form*

Sharing Personal Information

We share your Personal Information with service providers to help us provide our services and fulfill our contracts with you, as described above. For example:

- We use Shopify to power our online store. You can read more about how Shopify uses your Personal Information here: <https://www.shopify.com/legal/privacy>.
- We may share your Personal Information to comply with applicable laws and regulations, to respond to a subpoena, search warrant or other lawful request for information we receive, or to otherwise protect our rights.
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Behavioural Advertising

As described above, we use your Personal Information to provide you with targeted advertisements or marketing communications we believe may be of interest to you. For example:

- We use Google Analytics to help us understand how our customers use the Site. You can read more about how Google uses your Personal Information here: <https://www.google.com/intl/en/policies/privacy/>. You can also opt-out of Google Analytics here: <https://tools.google.com/dlpage/gaoptout>.
- For more information about how targeted advertising works, you can visit the Network Advertising Initiative's ("NAI") educational page at <https://www.networkadvertising.org/understanding-online-advertising/how-does-it-work>.

You can opt out of targeted advertising by:

- • **GOOGLE** - <https://www.google.com/settings/ads/anonymous>
- Additionally, you can opt out of some of these services by visiting the Digital Advertising Alliance's opt-out portal at: <https://optout.aboutads.info/>.

Using Personal Information

We use your personal Information to provide our services to you, which includes: offering products for sale, processing payments, shipping and fulfillment of your order, and keeping you up to date on new products, services, and offers.

Lawful basis

Pursuant to the General Data Protection Regulation (“GDPR”), if you are a resident of the European Economic Area (“EEA”), we process your personal information under the following lawful bases:

- Your consent;
- The performance of the contract between you and the Site;
- Compliance with our legal obligations;
- To protect your vital interests;
- To perform a task carried out in the public interest;
- For our legitimate interests, which do not override your fundamental rights and freedoms.

Retention

When you place an order through the Site, we will retain your Personal Information for our records unless and until you ask us to erase this information. For more information on your right of erasure, please see the ‘Your rights’ section below.

Automatic decision-making

If you are a resident of the EEA, you have the right to object to processing based solely on automated decision-making (which includes profiling), when that decision-making has a legal effect on you or otherwise significantly affects you.

We *DO NOT* engage in fully automated decision-making that has a legal or otherwise significant effect using customer data.

Our processor Shopify uses limited automated decision-making to prevent fraud that does not have a legal or otherwise significant effect on you.

Services that include elements of automated decision-making include:

- Temporary blacklist of IP addresses associated with repeated failed transactions. This blacklist persists for a small number of hours.
- Temporary blacklist of credit cards associated with blacklisted IP addresses. This blacklist persists for a small number of days.

Your rights

GDPR

If you are a resident of the EEA, you have the right to access the Personal Information we hold about you, to port it to a new service, and to ask that your Personal Information be corrected, updated, or erased. If you would like to exercise these rights, please contact us through the contact information above.

Your Personal Information will be initially processed in Ireland and then will be transferred outside of Europe for storage and further processing, including to Canada and the United States. For more information on how data transfers comply with the GDPR, see Shopify's GDPR

Whitepaper: <https://help.shopify.com/en/manual/your-account/privacy/GDPR>.

CCPA

If you are a resident of California, you have the right to access the Personal Information we hold about you (also known as the 'Right to Know'), to port it to a new service, and to ask that your Personal Information be corrected, updated, or erased. If you would like to exercise these rights, please contact us through the contact information above.

If you would like to designate an authorized agent to submit these requests on your behalf, please contact us at the address above.

Cookies

A cookie is a small amount of information that's downloaded to your computer or device when you visit our Site. We use a number of different cookies, including functional, performance, advertising, and social media or content cookies. Cookies make your browsing experience better by allowing the website to remember your actions and preferences (such as login and region selection). This means you don't have to re-enter this information each time you return to the site or browse from one page to another. Cookies also provide information on how people use the website, for instance whether it's their first time visiting or if they are a frequent visitor.

We use the following cookies to optimize your experience on our Site and to provide our services.

[Be sure to check this list against Shopify's current list of cookies on the merchant storefront: <https://www.shopify.com/legal/cookies>]

Cookies Necessary for the Functioning of the Store

Name	Function	Duration
_ab	Used in connection with access to admin.	2y
_secure_session_id	Used in connection with navigation through a storefront.	24h
_shopify_country	Used in connection with checkout.	session
_shopify_m	Used for managing customer privacy settings.	1y
_shopify_tm	Used for managing customer privacy settings.	30min
_shopify_tw	Used for managing customer privacy settings.	2w
_storefront_u	Used to facilitate updating customer account information.	1min
_tracking_consent	Tracking preferences.	1y
c	Used in connection with checkout.	1y
cart	Used in connection with shopping cart.	2w
cart_currency	Used in connection with shopping cart.	2w
cart_sig	Used in connection with checkout.	2w
cart_ts	Used in connection with checkout.	2w
cart_ver	Used in connection with shopping cart.	2w
checkout	Used in connection with checkout.	4w
checkout_token	Used in connection with checkout.	1y
dynamic_checkout_shown_on_cart	Used in connection with checkout.	30min
hide_shopify_pay_for_checkout	Used in connection	session

Name	Function	Duration
	with checkout.	
keep_alive	Used in connection with buyer localization.	2w
master_device_id	Used in connection with merchant login.	2y
previous_step	Used in connection with checkout.	1y
remember_me	Used in connection with checkout.	1y
secure_customer_sig	Used in connection with customer login.	20y
shopify_pay	Used in connection with checkout.	1y
shopify_pay_redirect	Used in connection with checkout.	30 minutes, 3w or 1y depending on value
storefront_digest	Used in connection with customer login.	2y
tracked_start_checkout	Used in connection with checkout.	1y
checkout_one_experiment	Used in connection with checkout.	session
checkout_session_lookup	Used in connection with checkout.	3w
checkout_session_token_<<token>>	Used in connection with checkout.	3w
identity-state	Used in connection with customer authentication.	24h
identity-state-<<token>>	Used in connection with customer authentication.	24h
identity_customer_account_number	Used in connection with customer authentication.	12w

Reporting and Analytics

Name	Function	Duration
_landing_page	Track landing pages.	2w

Name	Function	Duration
_orig_referrer	Track landing pages.	2w
_s	Shopify analytics.	30min
_shopify_d	Shopify analytics.	session
_shopify_s	Shopify analytics.	30min
_shopify_sa_p	Shopify analytics relating to marketing & referrals.	30min
_shopify_sa_t	Shopify analytics relating to marketing & referrals.	30min
_shopify_y	Shopify analytics.	1y
_y	Shopify analytics.	1y
_shopify_evids	Shopify analytics.	session
_shopify_ga	Shopify and Google Analytics.	session
customer_auth_provider	Shopify analytics.	session
customer_auth_session_created_at	Shopify analytics.	session

The length of time that a cookie remains on your computer or mobile device depends on whether it is a “persistent” or “session” cookie. Session cookies last until you stop browsing and persistent cookies last until they expire or are deleted. Most of the cookies we use are persistent and will expire between 30 minutes and two years from the date they are downloaded to your device.

You can control and manage cookies in various ways. Please keep in mind that removing or blocking cookies can negatively impact your user experience and parts of our website may no longer be fully accessible.

Most browsers automatically accept cookies, but you can choose whether or not to accept cookies through your browser controls, often found in your browser’s “Tools” or “Preferences” menu. For more information on how to modify your browser settings or how to block, manage or filter cookies can be found in your browser’s help file or through such sites as: www.allaboutcookies.org.

Additionally, please note that blocking cookies may not completely prevent how we share information with third parties such as our advertising partners. To exercise your rights or opt-out of certain uses of your information by these parties, please follow the instructions in the “Behavioural Advertising” section above.

Do Not Track

Please note that because there is no consistent industry understanding of how to respond to “Do Not Track” signals, we do not alter our data collection and usage practices when we detect such a signal from your browser.

Changes

We may update this Privacy Policy from time to time in order to reflect, for example, changes to our practices or for other operational, legal, or regulatory reasons.

Complaints

As noted above, if you would like to make a complaint, please contact us by e-mail or by mail using the details provided under “Contact” above.

If you are not satisfied with our response to your complaint, you have the right to lodge your complaint with the relevant data protection authority. You can contact your local data protection authority, or our supervisory authority here: <https://sdaia.gov.sa/ar/default.aspx>

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