

Thrivespring Limited Privacy Policy

1. INTRODUCTION

- 1.1 We are THRIVESPRING LIMITED (referred to as "we", "us" and "Thrivespring") and we are committed to protecting and respecting your privacy when you are visiting any website maintained by us including without limitation the websites at www.thrivespring.com, www.thrivespring.co.uk and our social networking pages (together the "Website") or communicating electronically with us.
- 1.2 This policy, together with the Terms of Service (which can be found at the bottom of our website at www.thrivespring.com and www.thrivespring.co.uk) explains what types of personal and non-personal information we collect when you use the Website and the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By disclosing your personal information to us by using the Website or speaking to us over the telephone you consent to the collection, storage and processing of your personal information as stated in this policy.
- 1.3 Thrivespring uses the personal information we collect from you to provide our service to you. We will not rent, sell or share your personal information with any other company.
- 1.4 For the purpose of the Data Protection Act 1998 (the **Act**), the data controller is Thrivespring Limited of 200 Aldersgate (c/o Buckworth Solicitors), London EC1V 4PW which is registered with the ICO with registered number Z3231785.

2. WHAT PERSONAL INFORMATION DO WE COLLECT?

- 2.1 We may collect, store and use the following kinds of personal information:
- (a) when you register as a user of the Website and/or complete your profile, you will be asked to complete a form which will give you the option to provide your username, your month and year of birth, an email address, personal characteristics (including without limitation your level of education, occupation, hobbies and interests) and the reason why you have joined the Website. You do not have to provide any of this information other than a username, your month and year of birth, and an email address;
 - (b) when you contact us by email or telephone or through any contact form provided on the Website, we may ask you to provide some additional information to that set out in paragraph (a) above so that we can best assist you with your enquiry;
 - (c) we may collect, store and use information about your computer, mobile device or other item of hardware through which you access the Website and your visits to and use of the Website (including without limitation your IP address, geographical location, browser/platform type and version, Internet Service Provider, operating system, referral source/exit pages, length of visit, page views, website navigation and search terms that you use);
 - (d) if you access the Website through a social networking profile, we may collect, store and use the details of that social networking profile and any information contained therein in order to populate any forms you might wish to complete on the Website; and

2.2 We may also ask you to complete surveys and give feedback that we use for research purposes, although you do not have to respond to them.

2.3 If you choose to provide us with information on other people, or post information relating to other people, you must ensure that they have consented to you providing us with such information and our use of such information in accordance with this policy. By providing us with information on any other person, we are entitled to assume that such other person has consented to you providing us with their information and to us contacting them.

3. HOW DO WE USE PERSONAL INFORMATION?

3.1 We may use your personal information for the following purposes:

- (a) to manage and administer the Website;
- (b) to improve your browsing experience by personalising the Website;
- (c) to manage and administer any orders made by you or any products marketed by you on the Website;
- (d) to enable you to use the Website;
- (e) to send you newsletters and other relevant and targeted promotional communications;
- (f) to deal with enquiries, complaints and feedback from you and our service providers;
- (g) to send you emails offering you to take part in a survey and/or give feedback; and
- (h) to analysis and improve the services offered on the Website.

4. WHEN MIGHT WE DISCLOSE PERSONAL INFORMATION?

4.1 We reserve the right to disclose your personal information to the extent required by any applicable law or governmental body or judicial body.

5. NEWSLETTERS AND OTHER PROMOTIONAL COMMUNICATIONS

5.1 If you wish to subscribe to any newsletter published by us or wish to receive other targeted and relevant promotional communications from us, we offer you the option to “opt-in” to this service. If you change your mind and wish to stop receiving any such communications, please either email us at unsubscribe@thrivespring.com or click the “unsubscribe” link in any email from us.

6. OUR USE OF COOKIES AND WEB BEACONS

6.1 Cookies are text files stored, either on a temporary or persistent basis on the hard drive of your computer. Cookies are used for authenticating, session tracking and maintaining specific information about the use and users of the Website (including user site preferences or the contents of electronic shopping carts).

6.2 The data collected by cookies is anonymous. You can delete all cookies that are already on your computer's hard drive by searching for files with "cookie" in it and deleting them. In addition, if you want to stop cookies from being stored on your computer, you can edit your browser settings so that

cookies are blocked. Unfortunately, if you block cookies you may not be able to use the full functionality of the Website. For more information about cookies, please visit: www.allaboutcookies.org

6.3 Web beacons consist of a small string of software code that represents a graphic image request on a Web page or email. There may or may not be a visible graphic image associated with the web beacon and often the image is designed to blend into the background of a Web page or email. Web beacons can be used for many purposes - including site traffic reporting, unique visitor counts, advertising auditing and reporting, and personalisation. Web beacons used by www.thrivespring.com collect only anonymous data.

6.4 In order to improve our Website and the services we offer you, we use (temporary and persistent) cookies, web beacons and/or other technologies to collect non-personally identifiable data. This non-personally identifiable data helps us to track browsing behaviour, to create specific or tailor-made offers or advertisements, and to monitor and record the visits and use of the Website.

6.5 In order to understand how people use our website and for marketing analysis and quality improvement purposes, we may collect, record, process and use, on an anonymous basis, certain information (including the total number of transactions, viewed web pages, referring/exit pages, platform type, date/time stamp information and details like the number and location of mouse clicks on a given page, mouse movements, scrolling activity and the search words you use while being on and using the Website).

6.6 If you register with us or if you continue to use the Website, you agree to our use of cookies.

7. **WHERE WE STORE YOUR PERSONAL DATA**

7.1 All information you provide to us is stored on our secure servers.

7.2 Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted through our Website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

7.3 We transmit personal information using Secure Sockets Layer (SSL) software which encrypts information you input. We maintain physical, electronic and procedural safeguards in connection with the collection, storage and disclosure of personally identifiable customer information. Our security procedures mean that we may occasionally request proof of identity before we disclose personal information to you.

7.4 It is important that you protect against unauthorised use of your password and username to the Website. Please choose a strong, unique password when you register with the Website, and be sure to sign off from the Website when you finish using a shared computer.

8. YOUR PRIVACY SETTINGS

8.1 You have control over what information you publish on your profile. When you complete the profile form, you will be able to fill in a significant amount of information. You are under no obligation to provide any or all of that information. If you do not wish to answer a question, you should leave the relevant box in the form blank. The relevant question will not be displayed on your profile.

8.2 Pages on the Website are accessible to search engines meaning that information posted by you on your profile (or on forums within the Website) is viewable by external search engines.

9. LINKS TO THIRD PARTY WEBSITES

9.1 The Website may include links to third party websites. These third party websites and advertisers, or internet advertising companies working on their behalf, sometimes use technology to send (or “serve”) the advertisements that appear on the Website directly to your browser. They automatically receive your IP address when this happens. They may also use cookies, JavaScript, web beacons and other technologies to measure the effectiveness of their advertising and to personalise advertising content. We do not have access to or control over cookies or other features that they may use, and the information practices of these advertisers and third party websites are not covered by this Privacy Policy. Please contact them directly for more information about their privacy policies. We are not responsible for the collection, use and disclosure of personal information by third party websites to which you provide information or visit.

10. YOUR RIGHTS

10.1 The Act gives you the right to ask us not to process your personal data for marketing purposes. We will inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at unsubscribe@thrivespring.com.

10.2 The Website may, from time to time, contain links to and from the websites of third parties. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

11. ACCESS TO INFORMATION

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.

12. CHANGES TO OUR PRIVACY POLICY

We reserve the right to amend this privacy policy. Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail.

13. CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should be sent to us through our contact form.