

## **Privacy and Cookie Policy**

Last Updated: October 2020

### **Introduction**

This is Beyond Limited (This is Beyond, *we or us*) and its subsidiaries (*Further East, LE Miami, Pure Life Experiences, We Are Africa and all associated brands related to This is Beyond Limited*) care about the privacy of your personal data and we are committed to protecting it. This Privacy Policy explains what information we collect about you and why, what we do with that information and how we handle that information.

For the purposes of the applicable data protection laws (the General Data Protection Regulation (Regulation (EU) 2016/679) (GDPR), together with the Data Protection Act 2018), the company responsible for your personal data is This is Beyond Limited. This policy is incorporated into This is Beyond's Terms & Conditions and applies to information obtained by us through your use of the information, software, products, events and services made available through our main company website: [www.thisisbeyond.com](http://www.thisisbeyond.com).

#### **\*More simply put:**

We are responsible for protecting your personal data. This privacy policy applies to personal data obtained through your use of our website, our platform/app and whether it's with us or one of our subsidiaries.

### **Collection of Your Personal Information**

We collect information that, alone or in combination with other data, could be used to identify you (Personal Data), such as your e-mail address, name, log-in information, photograph, physical address, telephone number, or employment information. If you make a purchase from us, we will collect and store your billing and/or credit card information. We may also collect anonymous demographic information which is not unique to you, such as your postal code, age, gender, preferences, interests and favourites (Non-Personal Data). Non-Personal Data is not linked to your personal data (for example, your IP address).

We will collect your personal data in several ways, including when you contact us through the website, by telephone, post, e-mail or through the other means set out below.

#### **\*More simply put:**

We collect information that could be used to personally identify you, such as your name and contact details. We may also collect information that is not personal to you and not linked to your personal information.

### **Information You Provide When You Register with Us**

When you engage in contact with us, you voluntarily give us certain personal data, including your:

- name and e-mail address (business or personal).
- billing information, if you make a purchase.

#### **\*More simply put:**

When you register with us, you're providing consent to us with regards to processing and controlling your personal data, such as your name, e-mail address and billing information.

## **Other Information We Collect**

We also collect this personal data as you use the website:

- User Content. This consists of all text, documents, content or information uploaded, entered, or otherwise transmitted by you in connection with your use of the website.

Please keep in mind that if you directly disclose personal data through the website's public message boards, this information will be available for anyone on the internet to review, see and use and we shall not be responsible for any such use.

Some of your personal data which is used to create your profile will be available to other members of our website and services. Please also keep in mind that if you directly disclose personal data through the website's private messaging services or at any of our events, this information will be available for the recipient to review, see, and use and we shall not be responsible for any such use.

### **\*More simply put:**

If you upload any user content to our website, this may contain your personal data, which we may collect and use for the purposes described here.

## **Automatically Collected Information**

When you visit our website, we automatically collect information about your computer hardware and software such as your IP address, browser type, domain names, access times, operating system, cookie information, referring website addresses, pages visited, links clicked, text entered, mouse movements, and Internet Service Provider. We analyse and use this information to better understand how our users use the service, to maintain and improve our service, and in some cases, to publicly disclose aggregated statistics regarding our services. For more information on this, please refer to our cookie section below.

### **\*More simply put:**

We automatically collect certain information about you when you visit our website. We use this information to analyse your use of the website and to improve our services.

## **Use of Your Personal Data**

We collect and use your personal data as necessary to perform our contract with you and for our legitimate business interests, including to:

- operate the website and deliver the services.
- communicate with you about the services you use, as well as respond to requests for assistance, including account verification support if you're having difficulty accessing your account; we will send a welcome email following registration to all registered users. We also periodically send service updates to registered users.
- display user content associated with your account and make sure it is available to you when you use our services.
- understand and improve how our users use and interact with our services.
- publicly disclose aggregated statistics regarding our users' use of our services.
- create and display your online profile (where necessary to use our services).
- ensure online adverts you receive from us are relevant to you.

When you register with us to receive our services, the legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

When we process any payment made by you, we process your personal data to prevent or detect fraud, including fraudulent payments and fraudulent use of the website. The legal basis for this processing is compliance with our legal obligations.

**\*More simply put:**

We collect your personal data to perform the contract you enter with us when you sign up to use our services. We also collect certain information when we have a good reason to do so.

**Direct Marketing**

We may use your personal data to contact you about our latest deals, news, our products or our services (we call this marketing).

If you provide us with your personal e-mail address, you will receive marketing communications from us if you have:

- subscribed to receive marketing communications from us; or
- purchased our products or services, and you have not opted out of receiving marketing from us when providing us with your e-mail address or contact number.

If you provide us with your business e-mail address, we have a legitimate interest in sending you marketing communications in order to grow our business and build our relationship with you, unless you have opted out of receiving marketing communications from us.

To unsubscribe from marketing emails at any time, please click on the unsubscribe link at the bottom of any marketing email, or you can contact us directly at [dpo@thisisbeyond.com](mailto:dpo@thisisbeyond.com).

We will get your express opt-in consent before we share your personal data with any third party for its own marketing purposes.

**\*More simply put:**

We will only send you marketing communications where you have provided us with your consent or where you have not opted out of receiving marketing communications from us. You can unsubscribe at any time. We will not share your personal data with third parties for marketing purposes unless we have your express opt-in consent.

**Storage of Personal Data**

Unless a longer retention period is required or permitted by law, we will only hold your personal data on our systems for the period necessary to fulfil the purposes outlined in this policy, or until you request that the information be deleted in accordance with your right of erasure (see "Your Rights" section below).

Even if we delete your personal data, we reserve the right to maintain a copy for legal, tax or regulatory purposes, but in such an event, we would seek to anonymise wherever possible and we will do so only if necessary to fulfil those legal, tax or regulatory purposes. Please refer to our contact details below for more information.

**\*More simply put:**

We'll retain your personal data for no longer than is necessary. For more information, please contact us.

**Personal Data Access & Disclosure**

We will only disclose personal data to third parties:

- when we use vendors, lawyers and service providers to assist us in meeting business or operating needs. The categories of recipients of the personal data includes service providers that provide us with, or assist us in, legal services, hosting our website, marketing our services, communicating with users, delivering and improving our services, e-mail communication, invoicing and payments, customer support services and analytics (these service providers may only access, process or store personal data pursuant to our instructions and to perform their duties to us, and in accordance with applicable laws and regulations); or
- when we have your explicit consent to share your Personal Information; or
- when we determine that disclosure is required to protect the rights, property, or personal safety of This is Beyond and users of the website, or to respond to lawful requests, warrants, or requests by public or regulatory authorities, including requests by law enforcement authorities; or
- if we sell some or all our business or assets, we may disclose your personal data to the prospective seller or buyer of such business or assets, and if the transaction closes, then your personal data may be transferred to the buyer.

We may disclose personal data to a member of our group, which means our ultimate holding company (This is Beyond Limited, which is in the United Kingdom) and its subsidiaries and all associated brands, as defined in section 1159 of the Companies Act 2006.

**\*More simply put:**

We disclose your personal data to third parties such as service providers. We also disclose your personal data when we have your explicit consent, or if we are required to do so by law.

**Transfers Outside of the EEA**

As part of the services offered to you through the website, the personal data you provide to us will be transferred to and stored in the United States of America and in certain circumstances, other countries outside of the European Economic Area (EEA). By way of example, a transfer of your personal data may happen if one of our service providers is in a country outside of the EEA. We also share information with our server provider company who are based in the United States of America.

We will only transfer personal data outside of the EEA where it is compliant with data protection legislation and the means of transfer provides adequate safeguards in relation to your personal data, for example, by way of data transfer agreement incorporating the current standard contractual clauses adopted by the European Commission.

To ensure that your personal data receives an adequate level of protection, we have put in place appropriate safeguards and procedures with the third parties we share your personal data with. This ensures your information is treated by those third parties in a way that is consistent with data protection laws.

**\*More simply put:**

We may transfer your personal data to locations outside of the EEA, but only where there are appropriate safeguards in place. We may transfer your information outside the EEA if, for example, one of our service providers is in such a location, or we transfer your information to our server provider who are based in the United States of America.

**Use of Cookies**

This website uses "cookies" to help you personalise your online experience. A cookie is a text file that is placed by us or our remarketing partners on your hard drive by a web page server. Our cookies do not run

programs or deliver viruses to your computer. Cookies are uniquely assigned to your computer and can only be read by a web server in the domain that issued the cookie to your computer.

One of the primary purposes of cookies is to provide a convenient feature to save you time. The cookie tells the server that you have returned to a specific page. For example, if you personalise the website pages, or register with the website, a cookie helps the website recall your specific information on subsequent visits. This simplifies the process of recording your personal data, such as your billing address or site preferences. When you return to the same website, the information you previously provided can be retrieved, so you can easily use the website features that you customised.

We may place the following cookies:

**Strictly necessary cookies.** These are cookies that are required for the operation of the website. They include, for example, cookies that enable you to log into secure areas of our website or make use of e-billing services. We do not require your consent to use these cookies.

**Analytical/performance cookies.** These allow us to recognise and count the number of visitors and to see how visitors move around the website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

**Functionality cookies.** These are used to recognise you when you return to the website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

**Targeting cookies.** These cookies record your visit to the website, the pages you have visited and the links you have followed. We will use this information to make our website more relevant to your interests and for remarketing as described below.

If you want to check or change what types of cookies you accept, this can usually be done within your browser settings. Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control.

You can see a complete list of all cookies used on our website and services by clicking [here](#).

#### **Your cookie preferences:**

We require your consent to use cookies that are not classed as 'strictly necessary' (please refer to our explanation of the different types of cookies we use above). Where you have consented to the use of cookies, you can always change your cookie preferences at any time by opting out. To opt out, click "Cookie Preferences" in the footer of our website and/or platform.

Alternatively, most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set, visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

#### **\*More simply put:**

We use cookies to enhance your online experience. If you do not want to receive cookies, you can reject them by opting out or modifying your browser settings.

#### **Data Security & Integrity**

We are committed to taking all reasonable and appropriate steps to protect the personal data that we hold from misuse, loss, or unauthorised access. We do this by using a range of technical and organisational measures including measures to deal with any suspected data breach. If you suspect any misuse or loss or unauthorised access to your personal data, please let us know immediately.

The website is designed to secure the personal data you provide on computer servers in a controlled, secure environment, with protections from unauthorised access, use or disclosure.

However, while we do our best to protect your personal data, we cannot guarantee the security of all data which is transmitted to the website or to another website via the internet or similar connection. If we have given you (or you have chosen) a password to access certain areas of the website, it is your responsibility to please keep this password safe.

**\*More simply put:**

Our website is designed to keep your personal data safe, however, we cannot guarantee the security of information transmitted over the internet or similar connection. You can do your part by keeping your password safe.

## **Your Rights**

Under the GDPR, you have rights in relation to your personal data, such as the rights of access, rectification, restriction, objection, portability, and erasure.

You also have the right to object to automated decision making and profiling and to the processing of your personal data for direct marketing.

Where we do rely on consent to process your personal data, you have the right to withdraw that consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Please note that these rights are subject to certain limitations set forth in applicable law.

To exercise any of these rights, please contact us. We will seek to deal with your request without undue delay, and in any event in accordance with the requirements of applicable laws. We are entitled to ask you to prove that you are who you say you are. We may ask you to provide copies of relevant ID documents to help us to verify your identity. Please note that we may keep a record of your communications to help us resolve any issues you raise.

You also have the right to lodge a complaint with your local supervisory authority (for UK residents, the Information Commissioner's Office, or ICO) if you believe we have failed to meet our obligations regarding your Personal Information. You can contact the ICO [here](#). We would, however, appreciate the chance to address your concerns before you approach any supervisory authority, so please contact us in the first instance.

**\*More simply put:**

It's your right to see what information we hold on you. Just contact us to find out more.

## **Links to Third Party Websites**

Our website includes links to other websites whose privacy practices are not under our control. If you submit personal data to any of those websites, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy on any website that you visit.

**\*More simply put:**

We link to other websites, whose privacy practices may differ from our own. We encourage you to read the privacy policy on any other website you visit carefully.

## **Children's Data**

We do not intend to solicit or collect personal data from anyone under the age of 18. If you are under 18, do not enter information on this website or engage our services. If you believe a child of yours

under the age of 18 has entered personal data, please contact us to have the data removed and terminate the child's account.

**\*More simply put:**

No one under the age of 18 should use our services.

**Changes to This Policy**

We will occasionally update this policy to reflect changes in law or government advice, changes in the way we run our business or deliver our services or customer feedback. It is your responsibility to review this policy each time you use our website or services. We encourage you to periodically review this policy to be informed of how we are protecting your Personal Information.

**\*More simply put:**

We may change this policy from time to time. We encourage you to review this policy regularly.

**Contact Information**

This is Beyond welcomes your comments regarding this policy. Please contact us at [dpo@thisisbeyond.com](mailto:dpo@thisisbeyond.com) or write to us at:

Head of Data Protection, This is Beyond Limited, 2/2 Shepherds Building West, Rockley Road, Shepherds Bush, London, W14 0DA.