

# PRIVACY POLICY

Markets Mastered (**we, our, us** or **Markets Mastered**) is committed to protecting the privacy and security of your personal information. This policy explains how we will collect, store and use any personal information about you so please read the following carefully.

## DATA PROTECTION PRINCIPLES

For the purposes of this policy **data protection law** means: (i) until 25 May 2018 the Data Protection Act 1998 and then (ii) from 25 May 2018 and unless and until it is no longer directly applicable in the UK, the General Data Protection Regulation ((EU) 2016/679) (**GDPR**) and any national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK and then (iii) any successor legislation to the GDPR or the Data Protection Act 1998.

We will comply with data protection law. Personal information we hold about you will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

## THE KIND OF INFORMATION WE HOLD ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). There are "special categories" of more sensitive personal data which require a higher level of protection.

We may collect, store and use the following information about you:

**Information you give us.** You may give us information when you contact us, register to use our site at [www.marketsmastered.com](http://www.marketsmastered.com) or any other site operated by us, place an order, provide feedback participate in social media, enter a competition, promotion or survey, and when you report a problem. This may include your name, address, e-mail address and phone number, financial and credit card information, personal description and photographs.

**Information we collect about you.** When you visit our site we may automatically collect the following information:

- Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, and browser information;
- Information about your visit to the site including traffic data, location data, web logs and other communication data,.

**Information we receive from other sources.** We may receive information about you from third parties (including business partners providing technical, payment and delivery services, advertising networks and analytics).

## **HOW WILL WE USE YOUR PERSONAL INFORMATION?**

We use your information:

- to process your orders and manage your account
- to communicate with you about our products and promotions;
- to monitor purchase history, site use and traffic patterns to improve our site design and products .
- to allow you to participate in interactive features of our site.
- to personalise your repeat visits to our site
- to contact you about leaving a review once your order has been completed
- to verify your identity;
- to enable third parties to carry out technical, logistical or other functions on our behalf.
- to prevent and detect fraud or abuses of our site.
- where we have a legal right or duty to use or disclose your information (for example in relation to an investigation by a public authority or in a legal dispute).

## **SHARING DATA WITH THIRD PARTIES**

We have never, and will never transfer your information to anyone for marketing purposes without your consent. However, it may be necessary for us to share your personal information with third parties in the following circumstances:

## **OUR SERVICE PROVIDERS AND SUPPLIERS**

In order to make certain services available to you, we may share some or all of your personal data with the following companies:

- PayPal, Braintree & Stripe
  - Reason: Contractual
  - Their business nature: Payment Processor
  - Explanation: In order to take payments on our website, we use these companies to handle the transfer of funds from your bank account to ours.
  - Data Exchanged:

- § Stripe & Braintree: Card Number, Expiry Date, CVV, Cardholder Name, Cardholder Postcode
  - § Braintree & PayPal: Paypal email Address
- Mailchimp & Aweber
  - Reason: Email Delivery
  - Their business nature: Email delivery platform
  - Explanation: In order for us to communicate with you we store some of your personal information with these companies
  - Data Exchanged:
    - § Email Address
    - § First Name & Last Name
- Digital Ocean & Linode
  - Reason: Server Hosting and Infrastructure
  - Their Business Nature: Server hosting and Infrastructure
  - Explanation: We use these companies to host our websites and systems. Your personal data is stored within our databases
  - Data Stored:
    - § Contact Information
    - § Purchase Information (excluding Credit Card Numbers, Expiry Dates and Card holder details)

We only allow our service providers to handle your personal data when we have confirmed that they apply appropriate data protection and security controls. We also impose contractual obligations on service providers relating to data protection and security, which mean they can only use your data to provide services to us and to you, and for no other purposes.

## **OTHER THIRD PARTIES**

To comply with law enforcement agencies, we may share your information with them as it is requested on a case-by-case basis

## **HOW LONG WILL WE KEEP YOUR INFORMATION?**

We will retain your personal information no longer than is necessary for the purpose we obtained it for thereby reducing the risk that it will become inaccurate, out of date or irrelevant. Information that is no longer needed will be securely deleted. Different retention periods apply for different types of data, however the longest we will normally hold any personal data is 6 years.

## WHAT ARE THE CONSEQUENCES OF FAILING TO PROVIDE PERSONAL INFORMATION OR WITHDRAWING CONSENT?

If you fail to provide certain information when requested:

- § We may not be able to fulfil your orders or perform other aspects of any contract we have entered into with you
- § We may be prevented from complying with our legal obligations
- § You may not be able to participate in the interactive aspects of our site.

## INFORMING US OF CHANGES

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

## CHANGE OF PURPOSE

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal information without your knowledge or consent where this is required or permitted by law.

## MARKETING

We would like to send you information about our products and services which may be of interest to you. If you have signed up for an account with us whilst making an online purchase or consented to receive marketing in any other way, you may opt out at a later date. You have a right at any time to stop us from contacting you for marketing purposes. If you no longer wish to be contacted for marketing purposes, you can unsubscribe at the foot of every email or contact us at [privacy@marketsmastered.com](mailto:privacy@marketsmastered.com).

**Web Banner Advertising** - If you visit our site, you may receive personalised banner advertisements whilst browsing other websites. These will relate to products you have viewed whilst browsing our site on your computer or other devices. These advertisements are provided by us via specialist providers using 'cookies' placed on your computer or other devices. You can remove or disable cookies at any time - see our [Cookie Policy](#) for further information.

## INTERNATIONAL TRANSFERS

To deliver products and services to you, it is sometimes necessary for us to share your personal information outside of the European Economic Area, usually when service providers are located outside the EEA or if you are based outside the EEA. These transfers are subject to special rules under data protection laws. If this happens, we will ensure that the transfer will be compliant with data protection law and your personal information will be kept secure.

## WHAT ARE YOUR RIGHTS?

**Right of access** - You have the right to obtain confirmation that your data is being processed and access to your personal data. You can make a request by email to [privacy@marketsmastered.com](mailto:privacy@marketsmastered.com). In most cases we will provide a copy of the information free of charge. However, we may charge a reasonable administration fee when a request is manifestly unfounded or excessive or to comply with requests for further copies of the same information although this does not mean that we will charge for all subsequent access requests. We must without delay and in any event within 1 month of your request (subject to extensions in some cases):

- § confirm what personal data we hold about you;
- § provide a copy of the data in commonly used electronic form; and
- § provide any supporting explanatory materials.

We can extend the time to respond by a further two months where requests are complex or numerous. If this is the case, we will inform you of this within one month of the receipt of the request and explain why the extension is necessary.

Where requests are obviously unfounded or excessive we can refuse to respond. In such cases, we will, within one month, explain why and will inform you of your right to complain to our Supervisory Authority and to pursue a legal remedy.

**Data portability** – in addition to your access right you can require us to provide a copy of your information that we hold in a commonly used machine readable format

**Rights of Correction and Erasure (“right to be forgotten”)** You may ask us to correct or remove information you think is inaccurate. You can do this by emailing [privacy@marketsmastered.com](mailto:privacy@marketsmastered.com)

## RIGHT TO WITHDRAW CONSENT OR RESTRICT PROCESSING

**Processing for marketing purposes** - You may object, at any time, to the processing of your personal data for direct marketing purposes. When you register and every time we get in touch with you, we will offer you the opportunity to opt-out of any service to which you have subscribed. Any e-mail we send you will contain an easy automated opt-out.

**Processing for our legitimate interest** - You can object to any processing which is for our legitimate interests or those of a third party in which case, the processing must stop, unless

there are compelling legitimate grounds for the processing which override your rights, or where the processing is necessary in relation to legal action.

You can raise an objection, withdraw consent or restrict processing by email to [privacy@marketsmastered.com](mailto:privacy@marketsmastered.com),

## **AUTOMATED DECISION MAKING**

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you. We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

## **HOW WE KEEP YOUR INFORMATION SECURE**

We use Secure Server Software (SSL) to ensure that personal information, including credit card details, remains private and secure. We will maintain appropriate safeguards to ensure the security, integrity and privacy of your information and will take reasonable steps to try to ensure that third parties to whom we transfer any of your information will provide sufficient protection of that information.

## **HOW WE USE COOKIES**

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This is used to track visitor use of the website and to compile statistical reports. For further information visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org). You can set your browser not to accept cookies and the websites mentioned tell you how to remove cookies from your browser. However in a few cases some of our website features may not function as a result.

For more information on the cookies we use and the purposes for which we use them see our cookie policy below

## **OTHER WEBSITES**

Our site may, from time to time, contain links to and from the websites of partner networks, advertisers and affiliates. Please note that these websites have their own privacy policies and we do not accept any responsibility or liability for these. Please make sure you are happy with these policies before you submit personal data to these organisations via their websites.

## CHANGES TO OUR PRIVACY POLICY

We will regularly review this Privacy Policy, taking account of any complaints about information handling and updating it as necessary to reflect any changes in our collection and use of personal data. Any changes we may make in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes. The Privacy Policy was last updated in May 2018.

## HOW TO CONTACT US

Questions, comments and requests regarding this Privacy Policy should be addressed to: The Data Protection Officer by email to [privacy@marketsmastered.com](mailto:privacy@marketsmastered.com),

## COOKIE POLICY

The Markets Mastered website uses cookies to distinguish you from other users of our website. This helps us to provide you with the best possible experience when you browse our website and also allows us to improve our site by identifying possible errors and generic browsing behaviours. All cookies collected by our site are anonymous and will not be used to personally identify you. By continuing to browse the site, you are agreeing to our use of cookies.

A cookie is a small text file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive and that text file is then sent back to the server each time you visit the website with the aim to prepare and optimise the page for you based on your previous activity. For more information about cookies you can visit [www.allaboutcookies.org/manage-cookies](http://www.allaboutcookies.org/manage-cookies).

We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
- **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our 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 our 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) and so allow us to customise our site and to provide you with offers that are targeted at your individual interests.

- **Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for the purpose to advertise to you on other sites, these partners will use the cookies as set out in this policy and at all times this data shall remain fully anonymous and specific to your browsing device. Using cookies for this purpose limits the number of times you see an advertisement as well as helping us measure the effectiveness of any advertising campaign.

We also work with Google Analytics, which uses cookies to help us analyse how customers use the site and for interest-based advertising (including remarketing) as set out in the 'Targeting cookies' description above. We use Google analytics to broadly analyse customer preferences on topics such as colour, product category, size, promotions, search terms and checkout methods, to review 'hot' and 'cold' areas of the site, to assess age and gender demographics and to support stock availability and store location enquiries. The information generated by the cookie(s) during your use of the website (including your IP address) is directly transmitted to and stored by Google. Google then uses this information to review and evaluate your use of the website, providing us with reports and other services relating to website activity and internet usage. For more information on how Google uses data, please visit <https://policies.google.com/privacy/partners?hl=en-GB&gl=uk>.

You can opt-out of making your site activity available to Google Analytics by installing the Google Analytics opt-out browser add-on. This add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) which is running on Markets Mastered's and other websites from sharing information with Google Analytics about your visit activity. The add-on is available here <http://tools.google.com/dlpage/gaoptout?hl=en> or if you have a Google account you can also amend your settings at <https://adssettings.google.com>.

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. These cookies are likely to be analytical/performance cookies or targeting cookies.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

If you have any further questions about this policy, please contact [privacy@marketsmastered.com](mailto:privacy@marketsmastered.com)