

Binumi Pro Limited

Privacy Policy 1st October 2018

This document comprises the Privacy Statement (“Statement”) of Binumi Pro Limited (“Binumi Pro”, “we”, “us” or “our”).

In providing our Service we are necessarily dealing with private information and this Statement sets out our policy for how we deal with subscriber and user data.

To make the information in this Statement easy to understand, we have highlighted different occasions when we could potentially collect personal information from you, when we do this and how this information may be used. These instances are broken down into the following sections:

- a. the legal bases on which we rely to process personal information
- b. the types of personal subscriber and user information we collect from you, either directly or indirectly,
- c. how and when this is done,
- d. how we may use this information,
- e. who we may share it with; and
- f. the steps we take to ensure data belonging to, or relating to, our subscribers and our users is safeguarded.

Personal information is any information that can be used to identify you or that we can link to you.

The Statement also elaborates on the choices you can make about the data we collect, and how you can control these decisions.

The prime purpose of collecting personal data is to improve your experience of using our Service and so that we can provide you with support.

1. Introduction

- a. At Binumi Pro, as a fundamental guiding principle, we respect the privacy of your data and take your privacy rights very seriously. This Statement explains, in simple terms, how we collect and use subscriber and user data as part of our Service. This Statement is specific to subscriber and user data and is distinct from the way we protect the privacy of casual visitors to our website who may not be users of our Service.
- b. The data we collect and use is limited to the purpose for which our subscribers expressly subscribe to our Service and for the limited other purposes specified in this Statement.
- c. Our objective in collection of data is focused on servicing our subscribers' and our users' requirements and in providing them with the benefits associated with the Service we provide.
- d. This Statement is incorporated into and comprises part of the Standard Terms and Conditions for use of our Service which can be accessed on this website (Our Website).
- e. All capitalised expressions used in this Statement and not otherwise defined shall have the meanings ascribed to them in the Standard Terms and Conditions for use of our Service.

2. The Legal Bases we rely upon for Processing Personal Information

There are different lawful bases that we rely on to use your personal information, namely:

- a. Performance of a contract

The use of your personal information may be necessary to perform the agreement you have with us including the provision of our Service to you, to register and maintain your account, to help with service issues or to respond to your requests.

b. Legitimate interests

We may use your personal information for our legitimate interests. For example, we rely on our legitimate interest to analyse and improve our Service and the content available via the our Website and app, to send you notifications about software updates or information about our Service or for administrative, fraud detection or other legitimate purposes.

Where we process your personal information based on our legitimate interest and no opt-out mechanism is available to you, you may exercise your right to object by sending an email to privacy@binumipro.com

3. Data Collection

In providing our Service we collect and retain certain information about our subscribers and the other users of our Service. This information can be categorised in one of two ways:

a. Personally identifiable Information about our subscribers (Your Data)

This means any information about our subscribers and our users from which they may be personally identified including their name, address, email address, telephone number, profession, credit card details and any other information which may be disclosed to us through use of our Service.

b. Non-personally identifiable information

This means information about subscribers and others users of our Service of a non-identifiable nature collected by internet technologies we use to track delivery and improve the effectiveness of our Service.

We do not collect any personally identifiable information with the exception of that which is volunteered by subscribers and users in order to deliver our Service. For example we will request an email address in order to respond to support requests or to communicate with you.

4. How Do We Collect Data

a. Cookies

We use cookies to collect data that enables us to improve our Service:

A “cookie” is a small software file stored temporarily or placed on a computer’s hard drive. The main purpose of a cookie is to allow a web server to identify the computer and the web browser of a person using a Website. It is then possible to tailor web pages and/or login information to the preferences of that person. Cookies help Binumi Pro display the information that our subscribers and our users need to use the capabilities of our Service and other information which we consider to be of interest to our subscribers and our users.

We use two types of cookies:

- Session cookies: these store transient data, specifically a session-ID that the server will use to distinguish the user’s browser from the browsers of other users. Session cookies will disappear from a user’s computer when he closes his web browser or turns off his computer.
- ‘Remember Me’ cookies: from time-to-time we use 3rd parties providing analytic services to ask users whether they would like to be remembered next time they visit our Website to use our Service. If the user agrees a cookie will be written to that user’s browser, simply containing his email address. ‘Remember Me’ cookies remain on a user’s computer after the user closes his web browser or turn off his computer.

b. Use of Cookies

By way of example cookies would be used within our Service as follows:

- o To identify your computer when you visit the website
- o To save user preferences such as interface language
- o To collect and analyse session information including duration of session, pages accessed, user location, page loading speed, search terms, page errors, returning and new users, browser preference, operating system, downloads, and referral sources
- o We do not at any time use cookies to collect any Personally Identifiable Information.

c. Cookie Opt-out

Users of our Service can generally accept or decline the use of cookies through a functionality built into their web browser. Users can do this by readjusting their browser settings although it should be noted that by disabling cookies a user may not then be able to use all features of our Service.

For more information on cookies and how to disable them, you can consult the information provided at the following web address www.allaboutcookies.org.

5. When Do We Collect Your Data

We collect Your Data from you when you:

- a. register to use our Service;
- b. when you post material on our Service;
- c. when you register to participate in seminars, tutorials, or competitions available via our Service;
- d. make a complaint or enquiry or provide other feedback to us; or
- e. otherwise disclose Your Data to us through our Service or otherwise at any time.

6. How Do We Use Your Data

We use Your Data to:

- a. help us provide our Service;
- b. process and complete subscriptions including the administration of payments which you make via our Website;
- c. confirm and investigate any transactions or transfers of monies that may occur in respect of any subscription you make;
- d. process and deal with any complaints or enquiries made by you;
- e. monitor, develop, run, provide and improve the Service;
- f. ensure the Service is presented in the most effective manner for you and your computer;
- g. notify you about changes to the Service;
- h. monitor and investigate any suspected breach by you (or otherwise relating to you) of this Privacy Policy or of our Standard Terms and Conditions for use of our Service;
- i. (in accordance with your preferences) send you information by email about the Service;
- j. (in accordance with your marketing preferences), pass Your Data to third parties for marketing purposes if you have authorised us to do so.

You can change your mind and choose to receive or not to receive communications from us or any third party who you consented may contact you at any time by using the relevant unsubscribe link which we include in each email or by sending us an email – see “How to Contact Us” below.

We will not keep Your Data for any longer than is necessary for the purposes of providing our Service.

7. Will We Share Your Information With Third Parties?

We will never sell or pass on Your Data to third parties for marketing or any other purposes without your consent.

We only pass on Your Data to third parties as follows:

- a. we may pass Your Data to our employees, agents, subcontractors and partner organisations to help operate our Service, take payments and provide relevant information to you;
- b. Your Data may be transferred to a successor company or other organisation in the event of a sale of our business or in the event we are placed into administration (but you will be notified and offered the chance to unsubscribe if this occurs);
- c. in some cases we may use a technical partner to conduct some processing of Your Data on our behalf, but this will always be subject to strict contractual control and in compliance with relevant data protection legislation;
- d. if, and only if, you have given your consent for such purpose, we may pass Your Data to third parties so that they can send you information about services and information which may be of interest to you; and
- e. in exceptional circumstances we may need to disclose Your Data to the police, regulatory bodies or legal advisers in connection with any alleged criminal offence or suspected breach by you (or otherwise relating to you) of this Privacy Policy or our Standard Terms and Conditions for use of our Service or pursuant to a court order.

In addition, some general statistical information about our user base may be passed on to reputable third parties for research purposes but these details will never include information personally identifying you.

If you post any information, including any of Your Data, on the public wall within the Binumi Pro Service, this will be generally available to all users of the Binumi Pro Service. If you do not want any of Your Data or any other information to be passed on to third parties you should not post this on the public wall and Binumi Pro shall have no liability to you to the extent you post any information on the public wall and this information is passed on to third parties by any other user.

You can change your mind about the passing of Your Data to third parties at any time by updating your marketing preferences – see “Your Rights and How to Contact” us below.

8. How Do We Protect Your Information?

a. Security

We will take all reasonable steps to protect Your Data. All the data collected by us is and will at all times be stored on a secure server. Your browser will encrypt all sensitive information (including payment details) which you input before it is sent to us. It is, however, an inescapable fact that the transmission of information via the internet is not completely secure. Although we will do our best to protect Your Data, we cannot guarantee the security of Your Data transmitted to our Website and any transmission is at your own risk. Once we have received Your Data, we will, however, use strict procedures and security features to try to minimise the likelihood of any unauthorised access.

b. Storage

Your Data collected by Binumi Pro may be stored and processed in your region or in any other country where Binumi Pro or its affiliates, subsidiaries or service providers are located or maintain facilities. Binumi Pro has put in place adequate mechanisms to protect Your Data when it is transferred internationally.

c. Retention

Binumi Pro will retain Your Data for as long as we deem it necessary to enable you to use our Website and as is necessary to our service to you, to comply with applicable laws (including those regarding document retention), to resolve disputes with any parties and otherwise as necessary to allow us lawfully to conduct our business. All of Your Data that we retain will be subject to this Privacy Statement and our internal retention guidelines. If you have a question about a specific retention period for certain types of personal information we process, please send an email to privacy@binumipro.com

d. Third Party Sites

Please be aware that our Service contains links to other websites which may be accessed by you. We are not responsible for the privacy policies, content or security of those other websites should you utilise any of these links.

e. We do not store any credit card numbers entered into our Website or payment systems.

9. Your Rights, Complaints and How To Contact Us

a. Your Rights

We want you to be in control of how Your Data is used by us. You can do this in the following ways:

- o you have the right to request a copy of Your Data at any time;
- o you can inform us of any changes to Your Data, or if you want us to correct any of Your Data we hold about you;
- o in certain situations, you can ask us to erase, block or restrict Your Data, or object to particular ways in which we are using Your Data; and
- o in certain situations, you can also ask us to send Your Data to a third party.

If we are using your personal information on the basis of your consent, you are entitled to withdraw that consent at any time. Moreover, where we process your personal information based on legitimate interest or in the public interest, you have the right to object at any time to that use of your personal information.

We rely on you to ensure that Your Data is complete, accurate and up to date. Please do inform us promptly of any changes or inaccuracies by contacting privacy@binumipro.com

If you wish to access, edit or remove profile information, change your password, close your account or request deletion of your personal data, you can do so by sending an email to privacy@binumipro.com

We will respond to any request to access or delete your data as soon as possible, and in any event, within 30 days.

b. Complaints

We are committed to working with you to obtain a fair resolution of any complaint or concern you may have about our use of your personal information. If, however, you believe that we have not been able to assist with your complaint or concern, you have the right to file a complaint with the data protection authority in your country (if one exists in your country) or with any other relevant supervisory authority.

c. How to Contact Us

If you have any comments or queries or complaints in connection with our Privacy Policy, would like to access Your Data or need to send us updated or corrected information including changing your marketing preferences, please contact us by email at info@binumipro.com. This e-mail address is protected from spambots. You need JavaScript enabled to view it.

INFORMATION ABOUT US

We are Binumi Pro Limited a UK registered company number 11540817 whose registered address is at 171 - 173 Gray's Inn Road London WC1X 8UE

This Privacy Policy was last updated on 1st October 2018