

# Privacy Policy

**At GindiLife, we are 100% committed to protecting the privacy and security of our customers and site visitors. We understand the trust you place in our business when you provide us with personal information. Our Privacy Policy sets out our privacy promise to you. We do not share your data with third parties for them to market their products/services to you. If you have any questions about how we Protect Your Privacy, please contact us at [info@GindiLifecom](mailto:info@GindiLifecom).**

GindiLife.com is the website of Gindi LLC , registered in the United states Any reference in this policy to “**GindiLife**”, “**we**”, “**us**” or “**our**” is to GindiLife.

When you interact with us through our website (or otherwise) you may provide, or we may collect, certain information from which you are personally identifiable (which is referred to as personal data). For the purposes of the General Data Protection Regulation or “**GDPR**” (and all other laws relating to the use your personal data), we are the “data controller”, meaning that we are responsible for deciding how your personal data is used and more importantly, for keeping your data safe and only using it for legitimate reasons.

We are committed to protecting your privacy and will take all steps necessary to comply with our legal obligations when using your personal data. This Privacy Policy explains how we fulfill this commitment, so please read this carefully.

## WHAT THIS POLICY TELLS YOU

1. What types of personal data you provide to us (or which we collect from you) when using our website or when you directly interact with us on other occasions;
2. How and why we use this data and the reasons we are legally allowed to do so;
3. Who we share your data with;
4. Your rights over your data and how you can exercise those rights; and
5. How to contact us if you have any issues or want to find out more.

## WHAT INFORMATION DO WE COLLECT AND WHAT DO WE USE IT FOR?

You may provide us with the following types of personal information when you register with GindiLife or otherwise when you directly interact with us (when using our website or otherwise):

- **Identity** - first name, surname, GindiLife log-in information (password), country of residence
- **Contact** - email address, telephone numbers and address
- **Financial** - payment card details, billing address, purchase information, payment history
- **Profile** - your preferences for marketing, other website preferences and feedback on your GindiLife experiences through reviews and surveys
- **Social** - if you choose to open a GindiLife account using your Facebook, Twitter or Google account, we will use your contact information used for the relevant account to help populate your GindiLife registration page

We may collect the following types of information from you when you use our website (using **Cookies** or other tracking technologies):

- **Usage** - information about how you use our website, including time spent on page, click-throughs, download errors
- **Technical** - IP address, browser type, hardware type, network and software identifiers, device information, operating system and system configuration

The table below sets out how we use your personal data and our lawful basis for doing so. We may process your personal data for more than one lawful basis depending on the specific purpose for which we are using it. Importantly, we will only use your personal data when the law allows us to.

Reason why we use the data	What data	Legal ground for using the data
Register you as a GindiLife customer	Identity, Contact, Profile, Social	Performance of a contract with you

Enable you to log-in to your GindiLife account	Identity, Contact, Social	Performance of a contract with you
Enable you to participate in a GindiLife competition	Identity, Contact, Financial, Surprise	Performance of a contract with you
To process payments which you make through our website	Identity, Contact, Financial	Performance of a contract with you
Arrange for the delivery of your prize if you have won a competition	Identity, Contact, Surprise	Performance of a contract with you
For internal administration and record keeping purposes	All	Performance of a contract with you Necessary to comply with a legal obligation Necessary for our legitimate interests (for effective business administration and service provision)
Notify you of changes to our Privacy Policy, our Terms and Conditions or other changes to our services or products	Identity, Contact	Performance of a contract with you Necessary to comply with a legal obligation
Answer your enquiries which may involve contacting you by post, e-mail or phone	Identity, Contact	Performance of a contract with you Necessary for our legitimate interests (to ensure our customers are informed and satisfied with our services)
Get in touch with you about relevant GindiLife competitions, products and services	Identity, Contact, Profile	Necessary for our legitimate interests (to develop our business, including our competitions, products and services) Consent
Contact you about third party products and services which we believe may be relevant to you or pass your details on to third parties to contact you directly about the same (in each case, only where you have indicated you would like to hear about these)	Identity, Contact, Profile	Consent
Improve and personalize your experience of the GindiLife website by delivering more relevant content and advertising whilst you browse	Identity, Contact, Profile, Usage, Technical	Necessary for our legitimate interests (to develop our business, improve our website and overall user experience and inform our marketing strategy)
Administer the GindiLife website, including website trouble shooting, testing and analysis and to enable you to participate in interactive features of our website	All	Performance of a contract with you Necessary for our legitimate interests (to ensure that our website is fully functional and operating in the most effective way for you)
Verify your identity and detect fraud and security issues	All	Necessary for our legitimate interests (to prevent and detect fraudulent activity, security incidents and criminal activity)

Give you the opportunity to provide us with feedback through reviews and surveys	Identity, Contact, Profile, Usage, Technical	Necessary for our legitimate interests (to develop our business, promote new products and services, obtain feedback from customers to improve our services)
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We will only use your personal data 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 data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

In addition to the above, we may also anonymize and aggregate your personal data in a way which means you cannot be identified. This may be helpful to us for testing our internal systems, carrying out research and general customer data analysis. Because this is not personally identifiable, we can use this for any purposes.

**WHO DO WE SHARE YOUR DATA WITH?**

Importantly, we do not pass your personal data onto any third parties for them to market their products/services to you. If in the future we decide that we want to, we will only do so if we have your consent.

We do however share your personal data with third parties to help us deliver our products and services to you in the most effective way possible. These include third parties who assist us with:

- Delivering relevant GindiLife email and text marketing (to the extent you have not unsubscribed)
- Our customer reviews and surveys
- Personalizing the content on our website to ensure a tailored user experience
- Delivering relevant targeted and re-targeted advertising to keep you up to date with our services
- Detecting fraud or criminal activity

- Creating your GindiLife account (being your social media companies who you have used to provide log-in information as part of the sign-up process)
- Running our competitions, such as our auditors, judges, professional advisors
- Other aspects of our service delivery, such as hosting our website and processing customer payments

If we share personal data with third parties, we will ensure that access is limited on a strictly need to know basis and is subject to suitable obligations relating to confidentiality and security. Please note that certain of these third party service providers use cookies or other tracking technologies, which are explained more fully in our [Cookies Policy](#)

In addition to the above, we may also be required to share your personal data with third parties if required by law or regulation. In such circumstances, we will make sure that the disclosure is only to the extent required by law or regulation.

## HOW WE KEEP YOUR DATA SECURE?

We adopt industry standard security processes to ensure your data is kept safe and secure and to prevent unauthorized access or use or loss of your data. By way of example, we use secure server software (EV SSL) which encrypts all information you input before it is sent to us. We also make sure that third parties who need to handle your data when helping us to deliver our services are subject to suitable confidentiality and security standards.

Despite the security measures we implement, please be aware that the transmission of data via the internet is not completely secure. As such, we cannot guarantee that information transmitted to us via the internet will be completely secure and any transmission is at your own risk.

## HOW LONG DO WE KEEP YOUR DATA FOR?

We will keep your data for as long as you hold a GindiLife account and/or where you are still happy to hear from us about our latest news, products and services. Once you no longer wish to be engaged with GindiLife we may still need to keep hold of your data if there is a legal reason for doing so (such as for tax purposes where you have made

purchases to play in our competitions or where we need to resolve any disputes with you).

#### LINKS TO THIRD PARTY WEBSITES

Our website may contain links to enable you to visit other websites easily. However, once you have used these links to leave our website we do not have any control over these third party websites and are not responsible for the protection and privacy of any information which you provide whilst visiting such sites. Your use of these third party sites are not governed by this Privacy Policy. You should exercise caution and examine the privacy policies and terms of use applicable to the web sites in question.

#### CHANGES TO OUR PRIVACY POLICY

If we amend our Privacy Policy, it will be published on the GindiLife.com website so please check back regularly to see if there have been any updates. If we make any substantial changes, we may also email you if it's appropriate.

#### YOUR RIGHTS

In certain situations, you are entitled to:

- **access** a copy of your personal data;
- **correct or update** your personal data, which you can do yourself by logging into your account or if you would prefer, please contact us and we can help you out;
- **erase** your personal data;
- **object** to the processing of your personal data where we are relying on a legitimate interest (as set out in the above table);
- **restrict** the processing of your personal data;
- request the **transfer** of your personal data to a third party; or
- where you have provided your consent to certain of our processing activities, in certain circumstances, you may **withdraw your consent** at

any time (but please note that we may continue to process such personal data if we have legitimate legal grounds for doing so).

If you want to exercise any of these rights, please [Contact Us](#). You don't have to pay a fee to exercise your rights, unless your request is clearly unfounded, repetitive or excessive (in which case we can charge a reasonable fee). Alternatively, we may refuse to comply with your request in these circumstances. Where your request is legitimate, we will always respond within one month (unless there is a legal reason to take longer, such as where your request is particularly complex). We may also need you to confirm your identity before we proceed with your request if it is not clear to us who is making the request.

In addition to the above, you may get in touch with the ICO (Information Commissioner's Office) if you are concerned about the way in which we are handling your personal data. However, where possible, we would really appreciate you speaking with us first if you have any concerns.

#### HOW TO OPT-OUT OF GindiLife MARKETING

You can opt-out of any GindiLife marketing at any time either by [Contacting Us](#) or by using the opt-out function detailed in the relevant marketing email. Please note that we may still need to send you service notifications by email, such as advising you of updated privacy terms or terms of play.

We do not pass your data onto any third parties for their marketing purposes. However, if we ever wish to do so in the future we will always get your consent. You can then opt-out from any third party marketing at anytime following the same process as above.

#### CONTACT US

If you would like to discuss anything in this policy or if you want to exercise your rights, please get in touch:

Email: [info@GindiLife.com](mailto:info@GindiLife.com)

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