

TRINITY LEARNING LTD – DATA PROTECTION PRIVACY POLICY

CONTENTS

CLAUSE

1.	Important information and who we are.....	1
2.	The data we collect about you.....	2
3.	How is your personal data collected?.....	3
4.	How we use your personal data.....	4
5.	Disclosures of your personal data.....	7
6.	International transfers.....	8
7.	Data security.....	8
8.	Data retention.....	8
9.	Your legal rights.....	9
10.	Glossary.....	10

Introduction

Welcome to Trinity Learning Ltd's privacy policy.

Trinity Learning Ltd respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and/or provide us with data when you purchase a product or service and tells you about your privacy rights and how the law protects you.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this privacy policy.

1. [IMPORTANT INFORMATION AND WHO WE ARE]

2. [THE DATA WE COLLECT ABOUT YOU]

3. [HOW IS YOUR PERSONAL DATA COLLECTED?]

4. [HOW WE USE YOUR PERSONAL DATA]

5. [DISCLOSURES OF YOUR PERSONAL DATA]

6. [INTERNATIONAL TRANSFERS]

7. [DATA SECURITY]

8. [DATA RETENTION]

9. [YOUR LEGAL RIGHTS]

10. [GLOSSARY]

1. Important information and who we are

Purpose of this privacy policy

This privacy policy aims to give you information on how Trinity Learning Ltd collects and processes your personal data through your use of this website, including any data you may provide through this website when you purchase a product or service.

We understand that where we collect personal data of children enhanced protections should be in place. Accordingly, and where necessary, we will notify parents / guardians of the personal data that we collect.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Controller

Trinity Learning Ltd is the controller and responsible for your personal data (collectively referred to as "Trinity Learning Ltd", "we", "us" or "our" in this privacy policy).

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights please contact the data privacy manager using the details set out below.

Contact details

If you have any questions about this privacy policy or our privacy practices, please contact our data privacy manager in the following ways:

Full name of legal entity: Trinity Learning Ltd

Email address: lindaquinn@trinitylearning.co.uk

Postal address: 24 Bourne Street, Eastbourne N21 3ER

Telephone number: 08006889960

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review.

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

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2. The data we collect 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).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, username or similar identifier, title, date of birth, gender, occupation and nationality.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.

- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for our products or services;
 - create an account on our website;
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy for further details.

- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:

Technical Data from the following parties:

- (a) analytics providers such as Google based outside the UK;
 - (b) advertising networks such as Google based outside the UK; and
 - (c) search information providers such as Goggle based outside the UK.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as Global Pay or WeChat Pay which may be based outside the UK.
 - Identity and Contact Data from data brokers or aggregators which may be based outside the UK.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges	(a) Identity (b) Contact (c) Financial	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)

(b) Collect and recover money owed to us	(d) Transaction (e) Marketing and Communications	
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage	Necessary for our legitimate interests (to develop our products/services and grow our business)

	(e) Profile (f) Marketing and Communications	
--	--	--

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. Please contact us if you have any questions about the way in which we use your personal data.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased services from us and you have not opted out of receiving that marketing.

Third-party marketing

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

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a purchase that you make.

Cookies

You can set your browser to refuse all or some cookies or to alert you to when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function correctly.

Additional information about cookies can be found at www.aboutcookies.org or www.allaboutcookies.org

Change of purpose

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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

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.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table above.

- External Third Parties as set out in the Glossary
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

We may transfer your data outside the UK. Specifically, your data may be transferred to China.

Many of our external third parties are based outside the UK so their processing of your personal data will involve a transfer of data outside the UK.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for legal and tax purposes.

In some circumstances you can ask us to delete your data: see 'your legal rights' below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights. More information can be found at:

<https://ico.org.uk/your-data-matters/>

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

THIRD PARTIES

External Third Parties

- Service providers acting as processors based in the EEA or China who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the EEA who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your 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.

Trinity Learning 用户使用与隐私协议

内容

条款

1. 重要信息与 TL 的介绍.....	1
2. TL 收集您的个人信息.....	2
3. TL 如何收集您的个人信息?	3
4. TL 如何使用您的个人信息?	4
5. 关于个人信息的披露.....	7
6. International transfers.....	8
7. 数据信息安全.....	8

8. 用户数据保留.....	8
9. 用户的合法权益.....	9
10. 词汇表.....	10

<导言>

欢迎阅读 Trinity Learning 《隐私协议》

Trinity Learning 尊重您的隐私并致力于保护您的个人数据。《Trinity Learning 隐私协议》将介绍在您访问 TL 网站时（无论您从何处访问），我们如何处理您的个人数据以及在您购买产品或服务时提供的数据，并告知您的隐私权和法律保护。

本隐私协议以分层格式显示，您可以单击下列的特定条款。可使用【词汇表】理解本协议中术语的含义。

1. 重要信息与 TL 的介绍
2. TL 收集您的个人信息
3. TL 如何收集您的个人信息？
4. TL 如何使用您的个人信息？
5. 关于个人信息的披露
6. International transfer
7. 数据信息安全
8. 用户数据保留
9. 用户的合法权益
10. 词汇表

一、【重要信息与 TL 的介绍】

本隐私协议的目的

本隐私协议旨在向您提供有关 Trinity Learning 如何在您使用本网站服务时收集和使用您的信息数据，包括您在网站购买产品或服务时提供的任何数据。

我们了解，在收集儿童数据的地方应采取加强保护措施。因此，如有必要，我们将通知家长/监护人我们收集哪些数据。

您必须阅读本隐私协议以及我们可能在特定场合提供的任何其他隐私协议或公平处理协议，以便您完全了解我们使用您的数据和为什么使用您的数据。本隐私协议是对其他通告和协议的补充，并不旨在覆盖它们。

Controller

Trinity Learning Ltd (“Trinity Learning Ltd”在本隐私协议中统称为：“我们”，“我们”或“我们的”)是控制者，对您的个人数据负责。

我们已委托一名数据隐私经理，负责监督与本隐私协议有关的问题。如果您对此隐私协议有任何疑问，包括任何行使您的合法权益的请求，请按照以下详细信息与数据隐私经理联系。

联系方式

如果您对本隐私协议或我们的隐私条款有任何疑问，请通过以下方式与我们的数据隐私经理联系：

法人实体全名：Trinity Learning Ltd

电子邮件地址：lindaquinn@trinitylearning.co.uk

邮政地址：伯恩街 24 号，伊斯特本，BN21 3ER

联系电话：+44 (0) 800 688 9960

您有权随时向英国信息专员公署（ICO）投诉（www.ico.org.uk）。不过，我们希望能在您联系 ICO 之前解决您的问题，因此请在第一时间与我们联系。

隐私协议的变更以及您通知变更的义务

我们会定期审查我们的隐私协议。

掌握您最新的准确数据对我们很重要，在您使用我们服务期间，如您的信息有所改变，请及时通知我们。

第三方链接

此网站可能包含指向第三方网站、插件和应用程序的链接。单击这些链接或启用可能会允许第三方收集或共享有关您的数据。我们不控制这些第三方网站，也不对其隐私协议负责。当您离开我们的网站时，我们鼓励您阅读访问的每个网站的隐私协议。

二、【TL 收集您的个人信息】

个人数据或称个人信息，是指任何有关个人的信息，从中可以识别该人。不包括身份已被删除的数据（匿名数据）。

我们可能会收集、使用、存储和传输关于您的各种个人数据，我们将这些数据分组如下：

身份数据包括名字、姓氏、用户名或类似标识符、头衔、出生日期、性别、职业和国籍。

联系数据包括帐单地址、送货地址、电子邮箱地址和电话号码。

财务数据包括银行账户和支付卡详细信息。

交易数据包括您与我们之间的交易详情，以及您从我们处购买产品和服务的其他信息。

✎ 技术数据包括互联网协议（IP）地址、您的登录数据、浏览器类型和版本、时区和位置、浏览器插件类型和版本、操作系统和平台，以及您访问本网站的设备上的其他技术。

✎ 配置文件数据包括您的用户名和密码、购买或订单、您的兴趣、偏好、反馈和问卷调查。

✎ 使用数据包括您如何使用我们的网站、产品和服务的数据。

✎ 营销和通信数据包括您在接收来自我们和我们的第三方的营销方面的偏好以及您的偏好。

我们还收集、使用和共享汇总数据，用于任何目的的统计或人口统计数据。汇总数据可能来自您的个人数据，但在法律上不被视为个人数据，因为这些数据不会直接或间接显示您的身份。比如，我们可以汇总您的使用数据，算出访问特定网站用户的百分比。但是，如果我们将汇总数据与您的个人数据合并或连接，以致可以直接或间接地识别您的身份，这种数据会视为个人数据，适用本隐私协议。

我们不会收集关于您的任何特殊的个人数据（包括有关您的种族或民族、宗教信仰或哲学、性生活、性取向、政治观点、工会成员、健康信息以及基因和生物特征数据的详细信息）。我们也不收集任何有关刑事定罪和犯罪的信息。

如果你没有提供个人信息

我们根据法律或我们与您约定好的条款收集个人数据，如果您未能按要求提供这些数据，我们可能无法履行与您约定好或正要与您约定的条款（比如向您提供产品或服务）。在这种情况下，我们可能不得不取消向您提供的产品或服务，如遇类似情况，我们会通知您。

11. 3. 【TL 如何收集您的个人信息？】

我们使用不同的方法收集您的数据，包括：

✎ 直接获取。您可以填写表格，或邮寄、电话、电子邮件或其他方式与我们联系的方式，向我们提供您的身份数据、联系数据和财务数据。在以下情况您需要提供您的个人数据：

✎ 购买我们的产品或服务；

✎ 在 TL 的网站上创建账户；

✎ 订阅我们的服务或出版物；

✎ 要求发送营销信息；

✎ 参加竞赛、晋升或调查；或

✎ 反馈或联系我们。

自动化技术或交互。当您与我们的网站交互时，我们会自动收集有关您的设备、浏览操作和模式的技术数据。我们通过使用 cookies、服务器日志和其他类似技术来收集这些个人数据。如果您访问使用我们 cookies 的其他网站，我们也可能会收到有关您的技术数据。请参阅我们的 cookie 政策以了解更多详细信息。

第三方或公开来源。我们将从各种第三方和公共库收到您的个人数据，如下所示：

来自以下各方的技术数据：

- (a) 设在英国境外的分析服务供应商，比如谷歌；
- (b) 设在英国境外的广告网络，比如谷歌；
- (c) 设在英国境外的引擎供应商，比如谷歌。

技术、支付和交付服务提供商的联系、财务和交易数据，比如，位于英国境外的 Global Pay 或 WeChat Pay。

英国境外的数据代理商或信息汇集公司索取的身份数据和联系数据。

4. 【TL 如何使用您的个人信息？】

我们只会在法律允许的情况下使用您的个人数据。，我们会在以下常见的情况下使用您的个人数据：

- 我方需要履行约定条款的地方，此条款为我方与您约定或即将与您约定的。
- 在我们（或第三方）的合法利益必要的地方，您的利益和基本权利不会凌驾于这些利益之上。
- 需要遵守法律义务的地方。

一般来说，尽管在通过电子邮件或短信向您发送第三方营销信息之前，我们会征得您的同意，但我们不会把您的同意作为处理您个人数据的法律依据。您有权随时通过与我们联系撤消对营销信息的权限。

我们使用您的个人数据的目的

我们在下面以表格形式列出了我们使用您的个人数据的所有方式，以及我们使用这些数据所依赖的法律依据。当然，我们也确认我们的合法权益。

请注意，根据我们使用您数据的特定目的，我们可能会出于多种合法理由处理您的个人数据。如果您需要了解有关我们处理您的个人数据所依据的特定法律的详细信息，请参见下表列出的依据。

目的/活动	数据类型	法律依据，包括合法权益
作为一个新用户注册	(a) 身份数据 (b) 联系数据	与您约定条款
处理和交付您的订单包括:	(a) 身份数据	(a) 与您约定条款

(a) 支付、费用及手续费 (b) 收回钱款	(b) 联系数据 (c) 财务数据 (d) 交易数据 (e) 营销和通信数据	(b) 我们的合法权益（收回钱款）
管理与您的关系包括： (a) 通知您有关我们条款或隐私政策的更改 (b) 请求您评价或进行调查问卷	(a) 身份数据 (b) 联系数据 (c) 配置文件数据 (d) 营销和通信数据	(a) 与您约定条款 (b) 遵守法律义务 (c) 我们的合法权益（坚持更新我们的内容并研究客户如何使用我们的产品或服务）
为了您能参与抽奖、竞赛活动或完成调查	(a) 身份数据 (b) 联系数据 (c) 配置文件数据 (d) 使用数据 (e) 营销和通信数据	(a) 与您约定条款 (b) 我们的合法权益（研究客户如何使用我们的产品/服务，如何开发和发展我们的业务）
管理和保护我们的业务和本网站（包括故障排除、数据分析、测试、系统维护、支持、报告和数据处理托管）	(a) 身份数据 (b) 联系数据 (c) 技术数据	(a) 我们的合法权益（用于经营我们的业务、提供管理和IT服务、网络安全、防止欺诈以及在业务重组或集团重组活动中） (b) 遵守法律义务
向您提供相关网站内容和广告，并衡量或了解广告的有效性	(a) 身份数据 (b) 联系数据 (c) 配置文件数据 (d) 使用数据 (e) 营销和通信数据 (f) 技术数据	我们的合法权益（研究客户如何使用我们的产品/服务，如何开发和发展我们的业务，并为我们的营销战略提供信息数据）
利用数据分析改善我们的网站、产品/服务、营销、客户关系和体验	(a) 技术数据 (b) 使用数据	我们的合法权益（为我们的产品和服务定义客户类型，保持网站的更新，发展我们的业务，并为我们的营销战略提供信息数据）
就您可能感兴趣的产品或服务向您提出建议和建议	(a) 身份数据 (b) 联系数据 (c) 技术数据 (d) 使用数据 (e) 配置文件数据 (f) 营销和通信数据	我们的合法权益（开发和发展我们的业务）

营销

我们为您提供关于个人数据用途的多种选择，尤其是在营销和广告方面。如果您对我们使用您的个人数据的方式有任何疑问，请与我们联系。

我们的优惠活动

我们可能会使用您的身份、联系、技术、使用数据和个人资料来判断我们认为您可能需要或感兴趣的内容。这就是我们决定产品、服务和报价的方式，可能与您有关（即市场营销）。

如果您从我们的网站获取信息或购买了服务，并且允许获取营销信息，您将收到我们的营销讯息。

第三方营销

在出于营销目的与第三方共享您的个人数据前，我们会先获得您的明确同意。

取消

您可以随时与我们联系，要求我们或第三方停止向您发送营销信息。但不适用于您购买产品给我们提供的个人数据。

Cookies

您可以将浏览器设置为拒绝全部或部分 cookie，或者设置提醒。如果您禁用或拒绝 Cookies，请注意，我们网站的某些部分可能无法访问或无法正常运行。

有关 cookie 的其他信息，请访问 www.aboutcookies.org 或 www.allaboutcookies.org

使用目的的改变

我们只会将您的个人资料用于我们收集资料，除非我们认为我们需要将其用于其他原因，并且该原因与原始目的相符。如果您想了解新用途与原用途的兼容性，请与我们联系。

如果我们需要出于不相关的目的使用您的个人数据，我们会通知您，并且向您说明此做法的法律依据。

请注意，在法律要求或允许的情况下，我们可能会根据上述规则，未经您知情或同意的情况下处理您的个人数据。

5. 【关于个人信息的披露】

出于上方列表的目的，我们可能会与以下第三方共享您的个人数据。

- ▮ 词汇表中列出的外部第三方
- ▮ 我们可以选择出售、转让或合并部分业务或资产的第三方。或者，我们收购其他业务或与之合并。如果我们的业务发生变化，那么新的所有者可以按照本隐私协议中规定的方式使用您的个人数据。

我们要求所有第三方尊重您个人数据的安全，并依法处理。我们不允许第三方服务提供商将您的个人数据用于他们自己的目的，只允许他们为指定目的并按照我们的指示处理您的个人数据。

6. 【International transfers】

我们可能会将您的数据转移到英国以外的地方。具体来说，您的数据可能会转移到中国。

我们的许多外部第三方都位于英国境外，因此他们对您个人数据的处理将涉及在英国境外传输数据。

无论何时我们将您的个人数据转移出英国，我们都会确保为其提供某种程度的保护。

如果您想进一步了解我们在将您的个人数据转移出英国时使用的具体方法，请与我们联系。

7. 【数据信息安全】

我们已采取适当的安全措施，防止您的个人数据意外遗失、未经授权使用或存取、更改或披露。此外，我们对因业务需求需要您的个人数据的雇员，代理商，承包商和其他第三方设置访问限制。他们只会按照我们的指示处理您的个人数据，并且必须保密。

我们已经制定了处理任何可疑的个人数据泄露的程序，并将在法律要求的情况下通知您和任何适用的监管机构。

8. 【用户数据保留】

您将使用我的个人数据多长时间？

我们仅在达到我们收集目的的合理必要范围内保留您的个人数据，包括满足任何法律、监管、税务、会计或报告要求。如果发生投诉，或者我们有理由相信我们与您的关系有可能被起诉，我们可能会将您的个人数据保留更长的时间。

为了确定适当的个人数据保留期，我们会考虑个人数据的数量、性质和敏感性、未经授权使用或披露您的个人数据可能造成损害的风险、我们处理您的个人数据的目的、我们是否可以通过其他方式达到目的、以及适用的法律、法规、税务、会计或其他要求。

根据法律规定，我们必须将客户的基本信息（包括联系、身份、财务和交易数据）保留六年，直到他们不再是客户（出于法律和税务目的）。

在某些情况下，您可以要求我们删除您的数据：有关详细信息，请参阅下面的【用户的合法权益】。

在某些情况下，我们会将您的个人数据匿名化（以便不再与您关联），出于研究或统计目的。在这种情况下，我们可能会无限期地使用此信息，且无需另行通知。

9. 【用户的合法权益】

在某些情况下，根据数据保护法，您享有与您的个人数据相关的权利。请单击下面的链接以了解有关这些权利的更多信息。更多信息请访问：

<https://ico.org.uk/your-data-matters/>

如果您希望行使上述任何权利，请与我们联系。

通常不会收取任何费用

您无需支付任何费用来访问您的个人数据（或行使任何其他权利）。但是，如果您的请求没有明显的根据，访问重复或过多，我们可能会收取合理费用。另外，在这种情况下，我们可能拒绝您的要求。

我们可能需要您的帮助

我们可能需要您提供特定信息，以帮助我们确认您的身份并确保您有权访问您的个人数据（或行使任何其他权利）。这是一项安全措施，以确保个人数据不会透露给任何人。我们可能会与您联系，要求您提供与您的要求有关的更多信息，从而加快我们的响应速度。

答复时限

我们尽量在一个月内回复所有合法的请求。如果您的请求特别复杂或您提出了许多要求，我们可能需要一个月以上的时间。在这种情况下，我们会通知您并及时更新。

10. 【词汇表】

合法权益

合法权益是指我们的业务在开展和管理我们的业务方面的利益，以使我们能够为您提供最佳的服务/产品以及最好和最安全的体验。在我们出于合法利益处理您的个人数据之前，我们确保考虑并平衡对您（无论是正面还是负面）和您权利的任何潜在影响。我们不会将您的个人数据用于对我们的利益的活动（除非我们征得您的同意，或者法律另有要求或允许）。您可以通过与我们联系，获取有关我们如何评估我们的合法权益，以防对您在特定活动方面的任何潜在影响的更多信息。

履行合同是指在履行您作为当事方的合同所必需的情况下处理您的数据，或者在签订此类合同之前应您的要求采取措施。

遵守法律义务意味着在必须遵守我们承担的法律义务的情况下处理您的个人数据。

第三方

外部第三方

✎ 充当 EEA 或中国的处理者的服务提供商，提供 IT 和系统管理服务。

✎ 担任处理者或联合控制者的专业顾问，包括欧洲经济区的律师，银行家，审计师和保险公司，他们提供顾问，银行，法律，保险和会计服务。

✎ 英国税务与海关总署，监管机构和其他充当加工者或联合控制者的机构，在某些情况下需要报告加工活动。

您的法律权利

您有权：

请求访问您的个人数据（通常称为“数据主题访问请求”）。这使您能够收到我们持有的有关您的个人数据的副本，并检查我们是否在合法地处理这些数据。

要求更正我们持有的有关您的个人数据。尽管我们可能需要验证您提供给我们新数据的准确性，但是这使您可以更正我们持有的关于您的任何不完整或不准确的数据。

要求删除您的个人数据。这使您可以要求我们在没有充分理由继续进行处理的情况下删除或删除个人数据。您还有权要求我们删除或删除您的个人数据，如果您已经成功行使了反对处理的权利（请参阅下文），我们可能非法处理了您的信息或需要将您的个人数据删除到遵守当地法律。但是请注意，由于特定的法律原因，我们可能无法始终满足您的删除要求，在适用时会向您提出要求时通知您。

反对在我们依靠合法利益（或第三方利益）的情况下处理您的个人数据，并且您的特定情况有一些事情使您希望以此为由反对，因为您认为这会影响您的基本利益权利和自由。您也有权反对我们在为直接营销目的而处理您的个人数据的地方。在某些情况下，我们可能会证明我们有令人信服的合法理由来处理您的信息，这些信息凌驾于您的权利和自由之上。

要求限制您的个人数据的处理。这使您可以要求我们在以下情况下暂停处理您的个人数据：

- ✖ 如果您希望我们确定数据的准确性。
- ✖ 如果我们对数据的使用是非法的，但您不希望我们将其删除。
- ✖ 即使您不再需要数据以建立，行使或捍卫法律主张，您仍需要我们在何处保留数据。
- ✖ 您已反对我们使用您的数据，但是我们需要验证我们是否有使用这些数据的合法理由。

请求将您的个人数据传输给您或第三方。我们将以结构化，常用的机器可读格式向您或您选择的第三方提供您的个人数据。请注意，此权利仅适用于您最初同意我们使用的自动信息，或我们使用该信息与您签订合同的自动信息。

在我们依靠同意处理您的个人数据的任何时候，都撤回同意。但是，这不会影响您撤回同意之前进行的任何处理的合法性。如果您撤回同意，我们可能无法为您提供某些产品或服务。在您撤回同意的情况下，我们会告知您情况。

