

# Lifebuild's GDPR Policy

Updated on the 17<sup>th</sup> of February 2019

## I. Collection and Use of Personal Information

Jonathan Quail and Deborah Graham, a partnership trading as Lifebuild in the United Kingdom of Great Britain (hereafter referred to as "Lifebuild"), may collect personal information from you. Personal information is information relating to an identifiable person who can, by virtue of such information, be directly or indirectly identified. You may be asked to provide your personal information any time you are in contact with Lifebuild or a Lifebuild affiliated company. Lifebuild and its affiliates may share this personal information with each other and use it consistent with this Privacy Policy. They may also combine it with other information to provide and improve their products, services, content and advertising. You are not required to provide the personal information that we have requested, but, if you choose not to do so, in many cases we will not be able to provide you with our products or services or respond to any queries you may have.

## II. What Personal Information We Collect

When You create a Lifebuild User Account, purchase a product or contact us, we collect a variety of information, including your name, mailing address, phone number, e-mail address, and contact preferences. When payment, or payment information, is required, we will direct you to submit credit or debit card information through a third-party provider such as Stripe, who will securely store your card information on their servers if necessary (e.g. you are using your card to pay monthly for a membership).

## III. How We Use Your Personal Information.

- The personal information we collect allows us to keep you updated on Lifebuild's latest product announcements and upcoming events. If You don't want to be on our mailing list, you can opt out any time by using the unsubscribe link in the last e-mail you received from Lifebuild. You will have the option to unsubscribe from an individual list, or from all Lifebuild lists.
- We also use personal information to help us create, develop, operate, deliver, and improve our products, services, content and advertising, and for loss prevention and anti-fraud purposes.
- We may use your personal information, including date of birth, to verify identity, assist with identification of users, and to determine appropriate services. For example, we may use date of birth to determine the age of Lifebuild Account holders.
- From time to time, we may use your personal information to send important notices, such as communications about purchases and changes to our terms, conditions and policies. Because this information is important to your interaction with Lifebuild, you may not opt out of receiving these communications if you are a member of one of the web sites controlled by Lifebuild.
- We may also use personal information for internal purposes such as auditing, data analysis and research to improve Lifebuild's products, services and customer communications.

## IV. Collection and Use of Non-Personal Information

We also collect data in a form that does not identify any specific individual. We may collect, use, transfer and disclose non-personal information for any purpose. The following are some examples of non-personal information that we collect and how we may use it:

- We may collect information such as business, language, zip/post code, area code, unique device identifier, referrer URL and the time zone where a Lifebuild product is used so that we can better understand customer behaviour and improve our products, services, and advertising.
- We may collect information regarding customer activities on any of our websites. This information is aggregated and used to help us provide more useful information to our customers and to understand which parts of our website, products and services are of most interest. Aggregated data is non-personal information.
- We may collect and store details of how you use our services. This information may be used to improve the relevancy of results provided by our services.

## V. Cookies and Other Technologies

Lifebuild's websites, e-mail messages, and advertisements may use "cookies" and other technologies such as tracking, re-marketing tags, and pixels based on context, e.g., a search query, a channel you are reading or inferred interests. These technologies help us better understand user behaviour, tell us which parts of our websites people have visited and facilitate and measure the effectiveness of advertisements and web searches. We treat information collected by cookies and other technologies as non-personal information. We design and target advertising based on how you interact with Lifebuild. If you do not wish to receive ads targeted to your interests from Lifebuild, you can choose to limit ad tracking, which will opt your Lifebuild ID out of receiving such ads regardless of what device you are using. You may still see ads based on context like a search query or a channel you are reading. Lifebuild and our partners also use cookies and other technologies to remember how you use our website and software. Our goal in these cases is to make your experience with Lifebuild more convenient and personal and provide you with better customer service. To limit ad tracking, you may opt-out by clicking on this [tool](#) for (USA) or this [tool](#) for (EU) both of which are not directly Lifebuild-affiliated. You may also use your browser's settings to disable cookies and other tracking tools. Please note that certain features of the Lifebuild website will not be available once cookies are disabled.

We gather some information automatically and store it in log files. This information includes Internet Protocol (IP) addresses, browser type and language, Internet service provider (ISP), referring and exit websites and applications, operating system, date/time stamp and clickstream data. We use this information to administer the site, to learn about user behaviour on the site, to improve our products and services and to gather demographic information about our user base. Lifebuild may use this information in our marketing and advertising services.

In some cases, we use a "click-through URL" linked to content on the Lifebuild website. When customers click one of these URLs, they pass through a separate web server before arriving at the destination page on our website. We track this click-through data to help us determine interest in particular topics and measure the effectiveness of our marketing communications. We also use it to account for Affiliate activity and pay Affiliate commissions and bonuses.

## VI. Disclosure to Third Parties

Lifebuild will not share your personal information with any other people or organisations without your express permission or unless it becomes necessary by law, litigation or requests from government authorities within or outside your country of residence for Lifebuild to disclose your personal information. Additionally, in the event of a reorganisation, merger, or sale of Lifebuild we may transfer all personal information we collect to the relevant third party.

## **VII. Protection of Personal Information**

Lifebuild takes the security of your personal information very seriously. When your personal data is stored by Lifebuild, we use computer systems with limited access housed in facilities using physical security measures. When you use some Lifebuild products and services that by their nature are public facing, such as when you post on a Lifebuild forum, the personal information and content you share is visible to other users and can be read, collected or used by them. You are responsible for the personal information you choose to share or submit in these instances. For example, if you list your name and e-mail address in a forum posting, that information is public. Please take care when using these features.

## **VIII. Retention of Personal Information**

Lifebuild will retain your personal information for as long as you have a Lifebuild account. After your Lifebuild account is terminated, we will retain your personal information for as long as necessary to fulfil the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law.

## **IX. Access to Personal Information**

You can help ensure that your contact information and preferences are accurate, complete, and up to date by logging in to your membership account. For other personal information we hold, we will provide you with access (including a copy) upon your request. We may decline to process requests that are frivolous, vexatious, jeopardise the privacy of others, are extremely impractical or for which access is not required by local law. Access, correction or deletion requests can be made by contacting [admin@lifebuild.com](mailto:admin@lifebuild.com).

## **X. Children & Education**

We understand the importance of taking extra precautions to protect the privacy and safety of children using Lifebuild's products and services. Children under the age of 18, are not permitted to create their own Lifebuild IDs; instead, a parent must obtain the account and provide the parent's information to Lifebuild. If we learn that we have inadvertently collected the personal information of a child under 18, we will delete the information as soon as possible.

## **XI. Third Party Sites and Services**

Lifebuild websites, products, applications, and services may contain links to third-party websites, products and services. Our products and services may also use or offer products or services from third parties. Information collected by third parties is governed by their own privacy and data protection policies. We encourage you to learn about these policies of the third parties with whom Lifebuild is associated.

## **XII. Your Rights Under the GDPR**

If you are a citizen or a resident of a country in the European Union, the GDPR grants you the following rights:

### **a. Access to Your Personal Data**

You have the right to receive a copy of your personal data that is subject to processing by Lifebuild. Ordinary requests will be granted without charge to you within one calendar month of when you make the request. In cases of excessive, unreasonable or repeated requests, Lifebuild may charge you a reasonable fee and may require additional time to grant your request. Also,

Lifebuild may use reasonable means to confirm your identity before granting any request for data to prevent it from granting fraudulent requests. To request a copy of your personal data, please contact us by e-mail at [admin@lifebuild.com](mailto:admin@lifebuild.com).

#### **b. To have Your Data Corrected**

If your personal data is erroneous or outdated, you have the right to have it corrected. To do so, please contact Lifebuild via e-mail at [admin@lifebuild.com](mailto:admin@lifebuild.com), or if you're a member of one of the websites we control, simply log in to your membership account on one of the sites we control.

#### **c. To be Forgotten**

You have the right to be forgotten by Lifebuild. You may exercise this right by e-mailing us at [admin@lifebuild.com](mailto:admin@lifebuild.com). We will comply with your request, at no charge to you, within one calendar month by deleting your account, along with all your personally identifiable data that is subject to any Lifebuild processing. Naturally, after we grant your request, you will not have access to any Lifebuild products or services unless and until you open a new account through one of the websites we control. Lifebuild may use reasonable means to confirm your identity before granting any request for data to prevent the granting of fraudulent requests.

#### **d. To Restrict Processing of Your Data**

You can request that your data not be processed via Lifebuild partners. You can make that request by e-mailing us at [admin@lifebuild.com](mailto:admin@lifebuild.com) and, if you wish, you can even specify which third parties to restrict from processing your data. We will respond to your request, at no charge to you, within thirty (30) days from when you make your request. Please be advised that some of our partners, e.g. Stripe, are essential to providing Lifebuild services to you, so that if you block processing of your information by them, Lifebuild's services may become unavailable to you.

#### **e. Portability**

You have the right to receive a copy of your personal data that is subject to processing by Lifebuild in a portable format, or to have it transferred directly from Lifebuild to another party. Ordinary requests will be granted without charge to you within one calendar month of when you make the request. Lifebuild may use reasonable means to confirm your identity before granting any request to transfer data to you or another party to prevent granting fraudulent requests. To request a copy of your personal data in a portable format, or to request a direct transfer of your data, please contact us by e-mail at [admin@lifebuild.com](mailto:admin@lifebuild.com).

### **XIII. Your Responsibility Under GDPR**

If you are a member of one of the websites controlled by Lifebuild, you may also be a business owner using the Lifebuild software and affiliate programme to sell our products and services to your customers. With respect to the customer data that you provide to Lifebuild, Lifebuild is a data processor and will comply with its obligations under the GDPR; but with respect to your customers, you are probably a data controller, and if any of your customers is a citizen or a resident of a country in the European Union, then you must ensure that you comply with your obligations as a data controller under the GDPR; namely, you must ensure that you afford your Customers the rights identified in section XII above. For a fee, Lifebuild can advise you on what you need to do in order to become GDPR compliant – please email us at [admin@lifebuild.com](mailto:admin@lifebuild.com) should you want to find out more about this - or consult legal counsel of your own choosing for advice on what you need to do to comply with GDPR.

#### **XIV. Our Companywide Commitment to Your Privacy**

To make sure your personal information is secure, we communicate our privacy and security guidelines to Lifebuild's employees and strictly enforce privacy safeguards within the company.

#### **XV. Privacy Questions**

If you have any questions or concerns about Lifebuild's Privacy Policy or data processing, or if you would like to make a complaint about a possible breach of local privacy laws, please contact us at [admin@lifebuild.com](mailto:admin@lifebuild.com). When a privacy question or an access or download request is received, to respond to your request or question properly, we may need to request more information from you. If You are unsatisfied with the response you receive, you may refer your complaint to the relevant regulator or ombudsman in your jurisdiction. If you ask us, we will endeavour to provide you with information about relevant complaint avenues which may be applicable to your circumstances. If you live in the European Economic Area, the United Kingdom or Switzerland and you wish to contact us regarding questions or to exercise your statutory rights, please contact us at [admin@lifebuild.com](mailto:admin@lifebuild.com).

#### **XVI. Updates to the Policy**

Lifebuild may update its Privacy Policy and this GDPR Policy from time to time, as posted on the websites we control.

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