

# PRIVACY POLICY

*Last Updated on May 22, 2018. This Privacy Policy is effective immediately for Users after that date.*

Surfmarketing ("we," "us,") respect your privacy and are committed to protecting it through our compliance with this Privacy Policy. This policy describes:

- the types of information that we may collect from you when you access or use our Website - www.surf.marketing and other online services (collectively, our "Services"); and
- our practices for collecting, using, maintaining, protecting and disclosing that information.

This policy applies only to information we collect through our Services and in the electronic communications sent through or in connection with our Services.

## DEFINITIONS

### User

"User" or "you" or "your" refers to you, as a user of the Services. A user is someone who accesses or uses the Services for the purpose of sharing, displaying, hosting, publishing, transacting, uploading information or viewing pictures and includes other persons jointly participating in using the Services.

### User Account

"User Account" is a separate part of the Website, containing User information required by Surfmarketing during registration.

### Content

"Content" will include (but is not limited to) images, photos, audio, video, location data, 'nearby places', and all other forms of information or data.

Surfmarketing strives to offer its visitors and Users the many advantages of Internet technology and to provide an interactive and personalised experience. For these purposes, we, from Surfmarketing, may use personally identifiable information - like your name, e-mail address, address, telephone number, etc., which are subject to the terms of this Privacy Policy. We, and we suppose you too, do not tolerate spam. We will therefore never sell, barter, or rent your email address to any unauthorised third parties.

## 1. WHAT INFORMATION DO WE COLLECT FROM OUR USERS?

Surfmarketing may collect and use information of and regarding its Users. We collect only data which is essential to our operations and enables us to provide you with better user experience.

The information, through which the person may be identified, may include data, which the User voluntarily enters, uses or provides when using the Services of the Surfmarketing Website, or submits when creating a User Account. Surfmarketing collects and uses the information for the purposes, outlined in this Privacy Policy, as well as to offer new services to the User or to familiarise him with new functionalities on the Website.

We may also use certain performance tracking tools, such as Google Analytics. Through the use of Google Analytics we gather information regarding your behaviour and preferences when using our online platform.

We collect two types of information from and about our Users, including information:

- by which you may be personally identified; and/or
- about your internet connection, the equipment you use to access our Services and your usage details (i.e. your Internet Service Provider).

The information we collect on or through our Services may include:

- User Account information:* Personal information, such as your full name and other information you may provide with your account, such as your address and phone number, that may be displayed as a part of your User Account;

We collect this information in order to verify your identity and provide you with an individualised experience of our Services.

- Contact Information:* Your contact information, such as email address and other ways of communication.

We collect this information in order to provide you with access to certain features of our Services and to inform you about relevant information concerning your use of our Services.

- Preferences:* Your preferences and settings such as time zone and language;

We collect this information in order to enhance your user experience.

- Searches and other activities:* The search terms you have looked up and results you selected;

We collect this information in order to improve your user experience and provide you with more relevant content and Services.

- Browsing information:* How long you used our Services, which features you used, etc.;

We collect this information in order to analyse the behaviour of our users and improve our Services.

- Communications:* Between you and Surfmarketing support staff regarding the Services.

We collect this information in order to monitor the quality of our support staff and your communications with us.

- Transactional information:* If you make payments or purchases through our Services, we may collect and store information about you to process your requests and automatically complete forms for future transactions;

We collect this information in order to enhance your buying experience.

- Information from third parties:* We may collect, process and store your user ID associated with any social media account (such as your Facebook and Google account) that you use to sign into the Services or connect with or use with the Services. This could include, without limitation, any information that you have made public through a given social media account of yours.

We collect this information in order to provide you with an easier and faster access to our Services.

- Location Data:* We may collect information about your location if you have instructed your mobile device or computer to send such information via the privacy settings on that mobile device or computer. We may use the location data collected to enhance your use of the Services by providing you with relevant content and contextual advertising

## **2. HOW WE GATHER INFORMATION FROM USERS?**

How we collect and store information depends on the pages you are visiting, the activities in which you elect to participate and the services provided. For example, you may be asked to provide information when you register for access to certain portions of our Website, create a User account, request certain features, such as e-mail newsletters or when you make a payment. Like most Websites, Surfmarketing also collects information automatically and through the use of electronic tools that may be transparent to our visitors and Users. For example, we may log the name of your Internet Service Provider.

## **3. WHAT WE DO WITH THE INFORMATION WE COLLECT?**

Like other Websites, we collect information to enhance your visit and deliver more individualised content. We respect your privacy and do not share your information with anyone, except in cases when that proves necessary.

We will retain the information we collect from you for a period of maximum of 5 /five/ years, or less if it is no longer necessary for the provision of the Surfmarketing services to you. After the expiry of this period we undertake to delete any information we have collected from you.

Aggregate information and information that does not personally identify you, may be used in many ways. For example, Surfmarketing may combine information about your usage patterns on the Website with similar information obtained from other users to help enhance our site and Services (e.g., to learn which pages are visited the most or what features Users find the most attractive). This information does not include any information about you and does not allow anyone to identify you individually. We may use personally identifiable information, collected on the Website, to communicate with you about your registration and customisation preferences; our Terms of Service and Privacy Policy; services and products offered by or through the Website; and other topics we think you might find of interest. Personally identifiable information collected by Surfmarketing may also be used for other purposes, including but not limited to Website administration, troubleshooting, processing of e-commerce transactions and other communications with you.

We strive to always protect your personal payment information. Payment transactions may be made via Paypal. We accept payments with all major credit and debit card providers, such as VISA, Mastercard and others. All payment card transactions made through our payment gateway are processed using a secure online payment gateway (Secure Socket Layer (SSL) technology) that encrypts your card details in a secure hosting environment. We do not hold your payment card details on the Surfmarketing server.

We may use personal information we collect from you, such as age, gender, interests, activities etc. in order to better understand your behaviour and provide you with the most relevant content and advertisements. We use this information to serve you with more relevant advertisements, a process also known as Remarketing.

For example, you may see certain advertisements on this website or other websites due to the fact that we contract with Google and other similar third parties, to target our advertisements based on the information we or they have collected, including but not limited through automated means, such as cookies.

You may opt out of the automated collection of information by changing your preferences at <http://www.google.com/settings/ads>.

## **4. DISCLOSURE**

Surfmarketing won't transfer information about you to third parties for the purpose of providing or facilitating third-party advertising to you. We won't sell information about you. We may share your account information with third parties in some circumstances, including: (1) with your consent; (2) to a service provider or partner who meets our data protection standards; (3) when we have a good faith belief it is required by law, such as pursuant to a subpoena or other legal process; (4)

when we have a good faith belief that doing so will help prevent imminent harm to someone. If we are going to share your information in response to legal process, we'll give you notice so you can challenge it (for example by seeking court intervention), unless we're prohibited by law or believe doing so may endanger others. We will object to requests for information about users of our services that we believe are improper. Certain third parties who provide technical support for the operation of our Website - our Web hosting service for example - may have access to such information.

## **5. RIGHT OF CONSENT WITHDRAWAL**

You may withdraw your consent for collecting your personal information at any time. To do so, please contact us at [support@surf.marketing](mailto:support@surf.marketing).

## **6. CHANGE OR REVIEW OF INFORMATION**

If you would like to review, change or delete personal data we have collected from you or you had submitted or permanently delete your account, please contact us.

For more information regarding the termination or deletion of your information, please refer to Section 8: Termination of this Privacy Policy.

## **7. ACCESSING & CORRECTING YOUR PERSONAL INFORMATION.**

We take reasonable steps to accurately record the personal information that you provide to us, as well as any subsequent updates.

We encourage you to review, update, and correct the personal information that we maintain about you. You may request that we delete personal data about you that is inaccurate, incomplete, irrelevant for legitimate purposes, or is being processed in a way which infringes any applicable legal requirements.

## **8. SECURITY: HOW WE PROTECT YOUR INFORMATION?**

We have implemented appropriate measures in the form of various technical, physical and other means, including, but not limited to measures regarding the security of our electronic systems and databases. These means aim at improving the integrity and security of the personal information that we collect and maintain. However, please be advised that even the best security measures cannot guarantee the full elimination of all risks. If we learn of any violation, breach or danger to our security systems breach, then we will attempt to notify you electronically so that timely and appropriate protective steps can be taken. Apart from informing you via e-mail, we may post a notice through the Website if a security breach occurs.

Your personal data safety is of utmost importance to us. We review and strive to improve our security measures on a regular basis.

If we detect a breach of our security measures, which has the potential of harming you as individual we will notify you without undue delay.

## **9. CONTROLLING YOUR PERSONAL DATA**

Other Users may be able to identify you, or associate you with your account, if you include your personal information in any content you post or make publicly available.

For more information on how you can control your data shared with us, please see section 4, 5 and 6 of the present agreement.

If you have any questions regarding the ways you can control your personal data, please contact us at [support@surf.marketing](mailto:support@surf.marketing).

## **10. TERMINATION**

As mentioned, you may at any time review or change the personal information we maintain about you by contacting Surfmarketing. Upon your request, we will delete your contact information and personal data from our active databases.

This Privacy Policy is effective until terminated by either party. If you no longer agree to be bound by this Privacy Policy, you must cease the use of the Surfmarketing Website. If you are dissatisfied with Surfmarketing, its content, or any of these terms, conditions, and policies, your sole legal remedy is to discontinue using the Website. Surfmarketing reserves the right to terminate or suspend your access to and use of the Website, or parts of them, without notice, if we believe, in our sole discretion that such use is in violation of any applicable law, or harmful to our interests or the interests of another person or entity, or where Surfmarketing has reasons to believe that their use is in violation of this Privacy Policy or the Terms of Use.

#### **11. CHILDREN'S PRIVACY**

Surfmarketing does not knowingly collect personal information from children under the age of 13. If we learn that we have personal information on a child under the age of 13, we will delete that information from our servers. Surfmarketing encourages parents to go online with their kids.

#### **12. CHANGES TO THIS POLICY**

Surfmarketing reserves the rights to change this Privacy Policy at any time. Please check this page periodically for changes. Your use of the services after any such amendment or change in the Privacy Policy shall be deemed as your express acceptance to such amended/changed Privacy Policy and an assent to be bound by such changed/amended Privacy Policy. Information collected prior to the time any change is posted will be used according to the rules and laws that applied at the time the information was collected.

#### **13. GOVERNING LAW.**

This Privacy Policy and the use of the Website are governed by the laws of United Kingdom. The parties undertake to first try to resolve the dispute with by negotiation. If the parties fail to reach an amicable resolution through negotiation, Surfmarketing agrees to submit the dispute to the competent Court of United Kingdom.

#### **14. COPYRIGHTS.**

The copyrights of our Website are the property of Surfmarketing.

Texts, graphics, photographs, animations, videos and clips, visible on the Website are the object of copyright and are part of the intellectual property of Surfmarketing. Those may not be reproduced, used, presented or represented without an explicit written permission by Surfmarketing. Any distribution of files, obtained by the Users under the Terms and Conditions of the Website, or of parts of such files, constitutes a violation of the relevant intellectual property protection laws and is prosecuted by the law.

Nothing contained on this Website may be interpreted as granting a license or right of use as a trademark without the prior explicit written consent of Surfmarketing.

#### **15. MISCELLANEOUS**

Surfmarketing is controlled, operated and administered entirely within United Kingdom.

If you are accessing the Surfmarketing Website from another jurisdiction, please be advised that you are transferring your personal information to Surfmarketing in United Kingdom and, by using the Website, you consent to that transfer and to abide by the applicable laws concerning your use of the Website and your agreements with us.

This statement and the policies outlined in this Privacy Policy are not intended to and do not create any contractual or other legal rights in or on behalf of any third party.

Surfmarketing may provide a translation of the English version of the Privacy Policy into other languages. You understand and agree that any translation of the Privacy Policy into other languages is only for your convenience and that the English version shall govern your rights and responsibilities. In case there are any inconsistencies between the English version of the Privacy Policy and its translated versions, the English version of the Terms shall prevail.

## **16. CONTACT**

If you believe Surfmarketing does not adhere to this Privacy Policy, in order to address a question, to resolve a complaint regarding the Website or the Surfmarketing Services, or to receive further information regarding the Services, please contact Surfmarketing via email at [support@surf.marketing](mailto:support@surf.marketing).