

CubeSocial understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits this website, cubesocial.com (“Our Site”) and will only collect and use personal data in ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of Our Site. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

This Policy was last updated on 23 May 2018.

1. Definitions and Interpretation

In this Policy, the following terms shall have the following meanings:

1. **“Account”** means an account required to access and/or use certain areas and features of Our Site;
2. **“Cookie”** means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in section 11, below;
3. **“Cookie Law”** means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;
4. **“personal data”** means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Site. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation (“GDPR”); and
5. **“We” or “Us” or “Our”** means Connectegrity Ltd T/A CubeSocial, a limited company registered in England under company number 07049722, whose registered address is Grove House, Lutyens Close, Basingstoke, RG24 8LR, UK.

2. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

3. Your Rights

1. As a data subject, you have the following rights under the GDPR, which this Policy and Our use of personal data have been designed to uphold:
 1. The right to be informed about Our collection and use of personal data
 2. The right of access to the personal data We hold about you
 3. The right to rectification if any personal data We hold about you is inaccurate or incomplete

4. The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you
 5. The right to restrict (i.e. prevent) the processing of your personal data
 6. The right to data portability
 7. The right to object to Us using your personal data for particular purposes
 8. Rights with respect to automated decision making and profiling.
2. If you wish to exercise any of these rights please contact us at hello@cubesocial.com. 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 may refuse to comply with your request in these circumstances.

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.

We try to respond to all legitimate requests within one month. Occasionally it may 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.

3. If you have any cause for complaint about Our use of your personal data, please contact Us using the details provided in section 12 and We will do Our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.

4. **What Data Do We Collect?**

Personal data means any information capable of identifying an individual. It does not include anonymised data.

We may process certain types of personal data about you as follows:

1. **Identity Data** may include your first name, maiden name, last name, username, marital status, title, date of birth and gender.
2. **Contact Data** may include your billing address, delivery address, email address and telephone numbers.
3. **Financial Data** may include your bank account and payment card details.
4. **Transaction Data** may include details about payments between us and other details of purchases made by you.
5. **Technical Data** may include your login data, internet protocol addresses, browser type and version, browser plug-in types and versions, time zone setting and location, operating system and platform and other technology on the devices you use to access this site.

6. **Profile Data** may include your username and password, purchases or orders, your interests, preferences, feedback and survey responses.
7. **Usage Data** may include information about how you use our website, products and services.
8. **Marketing and Communications Data** may include your preferences in receiving marketing communications from us and our third parties and your communication preferences.

We may also process Aggregated Data from your personal data but this data does not reveal your identity and as such in itself is not personal data. An example of this is where we review your Usage Data to work out the percentage of website users using a specific feature of our site. If we link the Aggregated Data with your personal data so that you can be identified from it, then it is treated as personal data.

5. **How Do We Use Your Data?**

1. All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the GDPR at all times. For more details on security see section 6, below.
2. Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data (e.g. by subscribing to emails), or because it is in Our legitimate interests. Specifically, We may use your data for the following purposes:
 1. Providing and managing your Account;
 2. Personalising and tailoring your experience on Our Site;
 3. Supplying Our products and services to you (please note that We require your personal data in order to enter into a contract with you);
 4. Replying to emails from you;
 5. Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time via the following methods)
 - Clicking the unsubscribe link included in each email
 - emailing hello@cubesocial.com with your request to opt out;
 6. Market research;
 7. Analysing your use of Our Site and gathering feedback to enable Us to continually improve Our Site and your user experience;
3. With your permission and/or where permitted by law, We may also use your data for marketing purposes which may include contacting you by email, telephone or post with information, news and offers on Our products and services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations

under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.

4. Third parties whose content appears on Our Site may use third party Cookies, as detailed below in section 11. Please refer to section 11 for more information on controlling Cookies. Please note that We do not control the activities of such third parties, nor the data they collect and use and advise you to check the privacy policies of any such third parties.
5. You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it.
6. We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected.

6. How and Where Do We Store Your Data?

1. We only keep your personal data for as long as We need to in order to use it as described above in section 5, and/or for as long as We have your permission to keep it.
2. Some or all of your data may be stored outside of the European Economic Area (“the EEA”) (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). You are deemed to accept and agree to this by using Our Site and submitting information to Us. If We do store data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the Data Protection Act 1998.
3. Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure data collected through Our Site.
4. Steps We take to secure and protect your data include:
 1. Ensuring that your connection to our website is secure; and
 2. Ensuring that internal access to all personal information we hold is secured by appropriate measures.

7. Do We Share Your Data?

1. Subject to section 7.2, We will not share any of your data with any third parties for any purposes.
2. We may sometimes contract with third parties to supply products and services to you on Our behalf. These may include payment processing, delivery of goods, search engine facilities, advertising, and marketing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law.
3. We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised

data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.

4. We may sometimes use third party data processors that are located outside of the European Economic Area (“the EEA”) (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). Where We transfer any personal data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the GDPR.
5. In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal requirements, a court order, or a governmental authority.

8. What Happens If Our Business Changes Hands?

1. We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Any personal data that you have provided will, where it is relevant to any part of Our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by Us.
2. In the event that any of your data is to be transferred in such a manner, you will not be contacted in advance or informed of the changes.

9. How Can You Control Your Data?

1. When you submit personal data via Our Site, you may be given options to restrict Our use of your data. In particular, We aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails and at the point of providing your details).
2. You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service (“the TPS”), the Corporate Telephone Preference Service (“the CTPS”), and the Mailing Preference Service (“the MPS”). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

10. Your Right to Withhold Information

1. You may access Our Site without providing any data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.
2. You may restrict Our use of Cookies. For more information, see section 11 and Our Cookie Policy.

11. Our Use of Cookies

Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve Our products services. By using Our Site you may also receive certain third party Cookies on your computer or device. Third party Cookies are those placed by websites, services, and/or parties other than Us. Third party Cookies are used on Our Site for advertising and other services. In addition, Our Site uses analytics services provided by Google and others, which also use Cookies. Website analytics refers to a set of tools used to collect and analyse usage statistics, enabling Us to better understand how people use Our Site. For more details, please refer to Our Cookie Policy.

You can modify your browser so that it notifies you when cookies are sent to it or you can refuse cookies altogether. You can also delete cookies that have already been set.

If you wish to restrict or block cookies that are set on your device then you can do this through your browser settings; the Help function within your browser should tell you how. Alternatively, you may wish to visit www.aboutcookies.org, which contains information on how to do this on a wide variety of desktop browsers.

Note that some pages or functions of the CubeSocial website may not work if you choose to disable cookies.

12. Contacting Us

If you have any questions about Our Site or this Privacy Policy, please contact Us by email at hello@cubesocial.com. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you.

13. Changes to Our Privacy Policy

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.