

## Privacy Policy

Welcome to the RIFU privacy policy ("**Privacy Policy**"). At RIFU, we are committed to keeping your personal information safe and secure, and handling it in accordance with our legal obligations. This Privacy Policy sets out in detail the purposes for which we process your personal information, what rights you have in relation to that information, who we share it with and everything else we think is important for you to be aware of.

Please make sure you check it carefully and if you don't agree with it, then unfortunately you shouldn't visit TBC or its associated domains (our "**Website**") or otherwise use our mobile or web applications, or generally use our services (our "**Services**"). By using our Services, you confirm that you accept the way in which we process your personal information. This Privacy Policy forms part of our Terms *[insert hyperlink to Terms]*, and capitalised words and phrases in it have the same meaning as those in our Terms.

If you have any concerns, please feel free to contact us at dan@posta.marketing or via TBC.

## About RIFU

We are Rifu UK Ltd, trading as RIFU (and referred to as 'RIFU', 'we', 'our' or 'us' in this Privacy Policy). Rifu UK Ltd is a limited company incorporated in England and Wales, with registered company number 12409440 and registered address at 2A The Quadrant Epsom Surrey KT17 4RH. We are the data controller for the purposes of the personal information processed in accordance with this Privacy Policy.

## About this Privacy Policy

This Privacy Policy applies to the personal information we collect about you through our Services, whether in person, by telephone, by post, via our Website or any other digital products, through our social media platforms, from third parties and when you otherwise communicate with us.

This Privacy Policy may change from time to time and, if it does, the up-to-date version will always be available on our Website. We will also tell you about any important changes to our Privacy Policy.

## The personal information we collect, how we collect it, and why

Personal information means any information about an individual from which that individual can be identified. The following shows information we process about you, and the purpose for which we process that information. There may be more than one reason for which we collect such information and we have only listed the main reasons. If you would like further information, please contact us at dan@posta.marketing.

### ***Basic Personal Information which you provide to us***

When you use or purchase our Services, we may collect some or all of the following basic information from you:

email address , username, password.

We collect this information so that we can personally and uniquely identify you, address you, personally communicate with you as part of our Services, confirm eligibility for them, and where applicable, customise our Services for you.

### ***Information we may collect automatically***

When visiting or using our Website or our Services generally, we may automatically collect some or all of the following types of information:

Unique customer number, IP address (or equivalent trackers), records of customer interactions with our Services (e.g. purchase or use history), records of competitions, prizes and promotional offers, records of communications, .

We collect this information so that we can deliver a more personalised, tailored service, and so that we can continue to understand our customers and develop our Services over time.

We may also use any or all of the above information to establish, exercise and defend our legal rights.

In respect of all the personal information we collect, our overarching purpose is to enable us to deliver the best marketing to our customers. We want all of our customers' information to be secure, but also visible to us so that we can provide them personalised customer service and a customised experience.

## **Our legal basis for processing personal information**

We only ever use your information in line with applicable data protection laws - in particular, the EU General Data Protection Regulation 2016/679 ("**GDPR**"). In short, this means we only use it where we have a legal basis to do so. Under GDPR, these are the general legal bases for which we process your personal information, as detailed in the table above:

- **Consent** - you have given us consent to process your personal information for a specific purpose that we have told you about.
- **Performance of our contract** - processing your personal information is necessary for a contract you have with us, or because we have asked you to take specific steps before entering into that contract.
- **Legitimate interests** - processing your personal information is necessary for our legitimate interests or those of a third party, provided those interests are not outweighed by your rights and interests (including where processing is required to comply with or enforce a legal obligation).

## **When do we what your personal information?**

We may disclose your information for certain purposes and to third parties, as follows:

- **Third Party Providers:** We use certain companies, agents or contractors ("**Third Party Providers**") to perform services on our behalf or to help deliver our

services to you. We may contract with Third Party Providers, for example, software or business services for emails and company management, online payment processing, CRM and communications, , providing customer service and other reasonable things which may become necessary in the course of running our business. In the course of providing such services, these Third Party Providers may have access to your personal information. We do not authorise them to use or disclose your personal information except in connection with providing their services to us.

- **Promotions with our partners:** We may offer joint promotions, schemes or incentives with our selected partners that, in order for you to participate, may require us to share your information with the relevant partner. In fulfilling these types of promotions, we may share your name and other information in connection with fulfilling the relevant incentive. Please note that our partners are responsible for their own privacy and data protection methods and if applicable you should refer to their relevant privacy policy.
- **To protect legitimate interests:** There are certain circumstances where we and our Third Party Providers may disclose and/or make use of your information where a disclosure would be necessary to: (a) satisfy any applicable law, regulation, legal process, or other legal or governmental request or requirement, (b) enforce applicable terms of use, including investigation of any actual or alleged breaches, (c) detect, prevent, or otherwise address illegal or suspected illegal activities (including payment fraud), security or technical issues, or (d) protect against harm to the rights, property or safety of RIFU, its members or the public, as required or permitted by law.
- **Transfers of our business:** In connection with any corporate re-organisation, restructuring, external investment, merger or sale, or other transfer of assets, we will transfer information, including personal information, provided that the receiving party agrees to comply with our requirements as set out in this Privacy Policy relating to your personal information.
- **Our affiliated companies:** we may share your information with our affiliated companies, such as other companies which we own, or other companies which have shares in RIFU, or other companies which are owned by those companies. We do this so that we can provide you with access to our Services according to our agreement, data storage and processing, providing customer support, making internal choices around business improvements, and for the other purposes set out in this Privacy Policy.

## Communications

### Marketing communications

We want to ensure that you are informed and aware of the best services and promotions that we can offer you. By consenting to receive additional communications (by mail, telephone, text/picture/video message, email or otherwise) from us and any named third parties that feature at the point of obtaining consent, we will process your

personal information in accordance with this Privacy Policy.

You can change your marketing preferences we have for you at any time by contacting us by email.. If you choose not to receive this information we will be unable to keep you informed of new services and promotions that may interest you.

### **Service communications**

As detailed above, we may send you communications such as those which relate to any service updates (e.g. service availability) or provide customer satisfaction surveys. We consider that we can lawfully send these communications to you as we have a legitimate interest to do so, namely to effectively provide you with the best service we can and to grow our business.

### **How long do we store your personal information?**

We keep your personal information for only as long as is necessary to provide you with our Services and for our legitimate and necessary business purposes. Such purposes might include maintaining the high standards of service which we strive to uphold, making decisions on how to progress our offering, complying with applicable legal obligations, and resolving any disputes which arise in the course of our business. In accordance with this Privacy Policy, you have the right to request that we delete your personal information, except where we are legally permitted or required to maintain certain personal information. For example:

- We are legally required to retain financial and transaction data for a minimum period of 7 years for tax, audit and accounting purposes.
- If we have an unresolved issue with you, then we will retain your personal information until the issue is resolved.

Any Third Party Providers that we engage will keep your personal information stored on their systems for as long as is necessary to provide the relevant services to you or us. If we end our relationship with any third party providers, we will make sure that they securely delete or return your personal information to us.

We may retain personal information about you for statistical purposes. Where information is retained for statistical purposes it will always be anonymised, meaning that you will not be identifiable from that information.

### **Security of your personal information**

We are committed to securing and protecting your personal information, and we make sure to implement appropriate technical and organisational measures to help protect the security of your personal information. We and our Third Party Providers will implement policies to guard against unauthorised access and unnecessary retention of personal information in our systems.

The information that we collect from you may be transferred to, and stored at, a destination outside of the European Economic Area (EEA). When we transfer and store your personal information outside of the EEA we will take steps to ensure that the information is transferred in accordance with this Privacy Policy and applicable data

protection laws. In particular, we will ensure that appropriate contractual, technical, and organisational measures are in place with any parties outside the EEA such as the Standard Contractual Clauses approved by the EU Commission.

Unfortunately, the transmission of your personal information via the internet is not completely secure and although we do our best to protect your personal information, we cannot guarantee the security of your information transmitted to us over the internet and you acknowledge that any transmission is at your own risk.

## **Links**

Our Website (or any other digital products we may operate) may contain links to websites operated by third parties. This Privacy Policy only applies to the personal information that we collect from you and we cannot be responsible for personal information collected and stored by third parties. If you follow or click on a link, please understand that the relevant third party websites have their own terms and conditions and privacy policies, and we do not accept any responsibility for the content of those third party websites or third party terms and conditions or policies. Please check these policies before you submit any personal information to these websites.

## **Children**

You must be 13 years of age or older to use our Services.

We do not knowingly collect personal information from individuals under 13 years of age. If you are under that age limit, then please do not use RIFU or provide any personal information to us.

If you are a parent or legal guardian of a child under the applicable age limit, and you become aware that your child has provided his/her personal information to us, please contact us at [dan@posta.marketing](mailto:dan@posta.marketing). If we learn that we have collected personal information of a child under the age of 13, then we will take all reasonable steps to delete that information from our systems.

In any case, we will only process personal information in line with GDPR and our legal obligations.

## **Your rights and choices**

Under the GDPR, as a user of our Services, you are entitled to certain rights. There are circumstances in which your rights may not apply. You have the right to request that we:

- provide you with a copy of the information we hold about you;
- update any of your personal information if it is inaccurate or out of date;
- delete the personal information we hold about you - if we are providing services to you and you ask us to delete personal information we hold about you then we may be unable to continue providing those services to you;
- restrict the way in which we process your personal information;
- stop processing your data if you have valid objections to such processing; and

- transfer your personal information to a third party.

For more information on your rights and how to use them, or if you would like to make any of the requests set out above, please contact us at [dan@posta.marketing](mailto:dan@posta.marketing).

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information 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.

As explained in the section on Communications, you have the right to ask us to stop processing your personal information for such purposes. Please note that we reserve the right to charge a fee for responding to requests where we reasonably determine that they are manifestly unfounded or onerous or being made in bad faith.

## **Contacting Us**

If you have any questions or concerns about how we handle your personal information, please contact us by email to [dan@posta.marketing](mailto:dan@posta.marketing).

If you are unsatisfied with our response to any data protection issues you raise with us, you have the right to make a complaint to the Information Commissioner's Office (**ICO**). The ICO is the authority in the UK which is tasked with the protection of personal information and privacy.

## **Cookies**

We may use cookies which help us monitor your use of RIFU, and in turn improve it based on how our customers interact with us. You can choose to accept or turn off cookies within your browser settings.

## **General**

You may not transfer any of your rights under this Privacy Policy to any other person.

We may transfer our rights under this privacy policy where we reasonably believe your rights will not be affected.

If any court or competent authority finds that any provision of this Privacy Policy (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this Privacy Policy will not be affected.

Unless otherwise agreed, no delay, act or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy.

This Privacy Policy will be governed by and interpreted according English law and if necessary, by the English courts.

