**PRIVACY POLICY**

Welcome to the B BUDDY LTD’s privacy policy.

B BUDDY LTD respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we collect, use and look after your personal data. It further describes your privacy rights and the control you can exercise in relation to your personal data.

**IMPORTANT INFORMATION**

This privacy policy is issued on behalf of B BUDDY LTD which is the controller of your personal data. B BUDDY LTD is a limited liability company registered in the Republic of Cyprus with registration number HE  417576.

This privacy policy is addressed to individuals outside B BUDDY LTD with whom we interact, including individual clients, representatives, directors, shareholders, beneficial owners, coaches and/or mentors and/or consultants of our application and/or website as well as other users of our services and suppliers.

**WHAT PERSONAL DATA WE COLLECT ABOUT YOU?**

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, maiden name, last name, username or similar identifier, title, date of birth, gender;
* Contact Data includes billing address, delivery address, email address, and telephone numbers (including mobile telephone number(s)), postal address.
* Business Data includes date identifying you in relation to matters on which you instruct us or in which you are involved such as diplomas and any other educational document or certificate;
* Consent Records Data includes records of any consents you have given us, together with the date, means of consent and any other information provided such as the subject matter of the consent provided;
* Supplier Data includes contact details and other information about you or your company or organisation where you provide services to B BUDDY LTD;
* Tracker (i.e. any technology - e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that enables the tracking of Users, for example by accessing or storing information on the User’s device);
* Usage Data (i.e information collected automatically through this Website (or third-party services employed in this Website), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Website, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.);
* Any other information relating to you which you may provide us with, such as health personal data, if required by us to be able to provide our services to you.

B BUDDY LTD does not collect any payment details data as they are collected directly by Stripe, Inc. which is responsible to effect the payments. Stripe, Inc. is a PCI Service Provider Level 1 and it is obliged to follow PCI compliance and the General Data Protection Regulations 2018 (GDPR).

**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. In this case, we may have to cancel the services we provide to you, but we will notify you if this is the case at the time.

**HOW AND WHY WE USE YOUR PERSONAL DATA**

We will only use your personal data for the following purposes:

* Service provision: B BUDDY LTD, to be able to provide its’ services.
* Business relationship: managing and administering our relationship with you, your company or organisation including keeping records about business contacts, services, billing and collection, and operating and managing our application and/or website and/or services provided to you, communicating and interacting with you and notifying you of any changes to our application and/or website and/or services;
* Communication: sending emails, newsletters and other messages to keep you informed of our developments, market insights and for marketing of our services;
* Online security: protecting our information assets and technology platforms from unauthorised access or usage and to monitor for malware and other security threats;
* Financial management: managing and administering the payment of our invoices and the fulfilment of your financial obligations towards us;
* Managing suppliers: who deliver services to us, including processing payments, accounting auditing billing and collection;
* Managing IT systems and provision of security: managing and administering our IT systems and ensuring that we have adequate security measures in place;
* Legal proceedings: establishing, exercising and defending legal rights/claims.

**HOW IS YOUR PERSONAL DATA COLLECTED?**

* Directly from you when you give us your identity, contact and financial data by filling in our forms or by corresponding with us by post, or email or otherwise.
* When you or your organisation offer or provide services to us as coaches and/or mentors and/or consultants;
* When you send us information via our application and/or website.

**CONFIDENTIAL INFORMATION:**

* All information we keep about you is kept safe, on a secure encrypted electronic records database;
* Information is shared only if we have gained your consent to share elsewhere;
* Your information will be kept for as long as required by the purpose they have been collected for. However, such period shall not apply in the case that legal and/or financial disputes or differences exist between the parties;
* We may share your personal information with certain trusted third parties which provide services to B BUDDY LTD, such as our professional advisers and auditors, suppliers and processors to whom we outsource certain support services, IT service providers, software providers, communication suppliers. We shall take measures to protect the confidentiality and security of the personal data in such circumstances;

**DATA SECURITY**

In accordance with the General Data Protection Regulations 2018 (GDPR), 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, disclosed used or accessed in an unauthorised way.

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.

**WHERE YOUR DATA ARE LOCATED**

The Data is processed at operating offices of B BUDDY LTD and in any other places where the parties involved in the processing are located.

Depending on the user's location, data transfers may involve transferring the user's data to a country other than their own. To find out more about the place of processing of such transferred data, users can check the section containing details about the processing of Personal Data below.

Users are also entitled to learn about the legal basis of Data transfers to a country outside the European Union or to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by B BUDDY LTD to safeguard their data.

If any such transfer takes place, users can find out more by checking the relevant sections of this document or inquire with B BUDDY LTD using the information provided below.

**DATA RETENTION**

Personal data may be kept on our personal IT systems, those of our contractors or in paper files.

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for. We will further retain your personal data where required for B BUDDY LTD to assert or defend against legal claims until the end of the relevant retention period or until the claims in questions have been satisfied.

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.

**DETAILED INFORMATION ON THE PROCESSING OF PERSONAL DATA**

Personal Data is collected for the following purposes and using the following services:

1. **ANALYTICS**

The services contained in this section enables B BUDDY LTD to monitor and analyse web traffic and can be used to keep track of User behaviour.

**Google Analytics (Google LLC)**

Google Analytics is a web analysis service provided by Google LLC (“Google”). Google utilizes the Data collected to track and examine the use of this Website, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – Privacy Policy – Opt Out.

**Amplitude Analytics (Amplitude Inc.)**

Amplitude Analytics is an analytics service provided by Amplitude Inc.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – Privacy Policy.

**FullStory (FullStory, Inc.)**

FullStory is an analytics and heat mapping service provided by FullStory, Inc.

FullStory maps how frequently Users interact with the different areas of this Website, allowing B BUDDY LTD to draw conclusions about their interests and preferences. FullStory further allows for the recording of mapping sessions making them available for later visual playback.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – Privacy Policy – Opt out.

**Facebook Ads conversion tracking (Facebook pixel) (Facebook, Inc.)**

Facebook Ads conversion tracking (Facebook pixel) is an analytics service provided by Facebook, Inc. that connects data from the Facebook advertising network with actions performed on this Website. The Facebook pixel tracks conversions that can be attributed to ads on Facebook, Instagram and Audience Network.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – Privacy Policy.

**Google Ads conversion tracking (Google LLC)**

Google Ads conversion tracking is an analytics service provided by Google LLC that connects data from the Google Ads advertising network with actions performed on this Website.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – Privacy Policy.

1. **CONNECTING DATA**

This type of service allows B BUDDY LTD to connect Data with third-party services disclosed within this privacy policy.

This results in Data flowing through these services, potentially causing the retention of this Data.

**Zapier (Zapier, Inc.)**

Zapier is a workflow automation service provided by Zapier, Inc. that automates the movement of Data between (third-party) services.

Personal Data processed: email address.

Place of processing: United States – Privacy Policy.

1. **CONTACTING THE USER**

**Contact form (this Website)**

By filling in the contact form with their Data, the User authorizes this Website to use these details to reply to requests for information, quotes or any other kind of request as indicated by the form’s header.

Personal Data processed: email address; first name; last name.

**Mailing list or newsletter (this Website)**

By registering on the mailing list or for the newsletter, the User’s email address will be added to the contact list of those who may receive email messages containing information of commercial or promotional nature concerning this Website. Your email address might also be added to this list as a result of signing up to this Website or after making a purchase.

Personal Data processed: email address; first name; last name.

1. **DISPLAYING CONTENT FROM EXTERNAL PLATFORMS**

This type of service allows you to view content hosted on external platforms directly from the pages of this Website and interact with them.

This type of service might still collect web traffic data for the pages where the service is installed, even when Users do not use it.

**Font Awesome (Fonticons, Inc. )**

Font Awesome is a typeface visualization service provided by Fonticons, Inc. that allows this Website to incorporate content of this kind on its pages.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – Privacy Policy.

1. **INFRASTRUCTURE MONITORING**

This type of service allows this Website to monitor the use and behaviour of its components so its performance, operation, maintenance and troubleshooting can be improved.

Which Personal Data are processed depends on the characteristics and mode of implementation of these services, whose function is to filter the activities of this Website.

**New Relic (New Relic)**

New Relic is a monitoring service provided by New Relic Inc.

The way New Relic is integrated means that it filters all traffic of this Website, i.e., communication between the Application and the User's browser or device, while also allowing analytical data on this Website to be collected.

Personal Data processed: Tracker; Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: United States – Privacy Policy.

1. **TAG MANAGEMENT**

This type of service helps B BUDDY LTD to manage the tags or scripts needed on this Website in a centralized fashion.

This results in the Users' Data flowing through these services, potentially resulting in the retention of this Data.

**Google Tag Manager (Google LLC)**

Google Tag Manager is a tag management service provided by Google LLC.

Personal Data processed: Tracker.

Place of processing: United States – Privacy Policy.

1. **USER DATABASE MANAGEMENT**

This type of service allows B BUDDY LTD to build user profiles by starting from an email address, a personal name, or other information that the User provides to this Website, as well as to track User activities through analytics features. This Personal Data may also be matched with publicly available information about the User (such as social networks' profiles) and used to build private profiles that B BUDDY LTD can display and use for improving this Website.

Some of these services may also enable the sending of timed messages to the User, such as emails based on specific actions performed on this Website.

**SendinBlue Marketing Automation (SendinBlue SAS)**

SendinBlue is a User database management service provided by SendinBlue SAS.

Personal Data processed: email address; Tracker; Usage Data.

Place of processing: France – Privacy Policy.

**ADDITIONAL INFORMATION ABOUT DATA COLLECTION AND PROCESSING**

**System logs and maintenance**

For operation and maintenance purposes, this Website and any third-party services may collect files that record interaction with this Website (System logs) use other Personal Data (such as the IP Address) for this purpose.

**How “Do Not Track” requests are handled**

This Website does not support “Do Not Track” requests.

To determine whether any of the third-party services it uses honor the “Do Not Track” requests, please read their privacy policies.

**SHARING INFORMATION**

We will share the information with people providing you care or involved in research (unless you request otherwise). Anyone accessing and using your data must keep this confidential.

Any information shared without permission will adhere to the General Data Protection Regulations 2018 (GDPR).

**YOUR RIGHTS**

You may exercise the following rights regarding your personal and/or medical data by B BUDDY LTD:

* The right to confidentiality;
* The right to withdraw your consent at any point;
* The right to access your records;
* The right to verify and seek rectification;
* The right to erasure or otherwise removal of your data. However, if this erasure is seen as harmful to the process of providing mental health care or fraudulent in erasing information important, it can be refused;
* The right to restrict processing of your data;
* The right to object to the processing of your data;
* The right to data portability
* The right to lodge a complaint before the competent data protection authority.

**DIRECT MARKETING**

We may use the information you give us for direct marketing from us only if you give us your consent. You can opt-out of receiving direct marketing from us at any time by sending an email to the Data Protection Manager using the details set out at the end of this policy.

**DATA TRANSFERS OUTSIDE THE EUROPEAN ECONOMIC AREA**

Other than disclosures in accordance with section 6 above, we shall not transfer your personal data outside the European Economic Area (EEA).

**CHANGES TO THIS POLICY**

This Privacy Policy was last updated in August 2022. This policy may be changed from time to time to reflect changing legal requirements or change in our processing practices. If we change anything important about this policy, we will highlight those changes at the beginning of the policy.

**HOW TO CONTACT US**

If you would like more information about the way we manage personal data that we hold about you please contact our Data Privacy Manager as set below:

Email address: info@bbuddy.expert

Postal address: Data Privacy Manager

B BUDDY LTD

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