



VINE CODE LIMITED PRIVACY POLICY

1. Overview

Vine Code Limited (“we”) are committed to protecting and respecting your privacy. This policy describes how we may collect and use personal information, and the rights and choices available to our visitors and users regarding such information.

It is important that you read this privacy notice so that you are fully aware of how and why we are using your data.

For the purposes of the Data Protection Act 2018 (the “Act”), the data controller is: Vine Code Limited, 80 West View, Barlby Road, Selby YO8 5BD. Data Protection Registration Number is ZA129873.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the email: privacy@vinecode.uk

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

2. Information we may collect from you

We may collect the following types of information regarding our Visitors and Users:

1. Un-identified and non-identifiable information pertaining to a Visitor or un-identified User, which may be made available to us, or collected automatically via his/her use of the Services ("Non-personal Information"). Such Non-personal Information does not enable us to identify the Visitor or User from whom it was collected.

The Non-personal Information collected by us mainly consists of technical and aggregated usage information, such as Visitors' and Users' browsing activity on the Services, non-identifying information regarding the Visitor's or User's device, operating system, internet browser, screen resolution, language and keyboard settings, internet service provider, referring/exit pages, date/time stamps, etc.

2. Individually identifiable information, namely information that identifies an individual or may with reasonable efforts cause the identification of an individual, or may be of private or sensitive nature ("Personal Information").

The Personal Information collected by us mainly consists of contact details (e.g., e-mail address or phone number), billing details (name, physical billing address, payment method and transaction details), which are only collected from Users with Paid Services, details regarding a browsing or usage session (IP address, Geolocation and/or device unique identifier), details regarding connected third party accounts (such as the e-mail or username for a connected PayPal, Google or Facebook account), correspondences (including those made through or uploaded to our Services), and any other Personal Information provided to us by Visitors and/or Users through their access to and/or use of the Services. For the avoidance of doubt, any Non-personal Information that is connected or linked to Personal Information (for example, in order to improve the Services we offer) is deemed and treated by us as Personal Information, as long as such connection or linkage exists.

3. We may also collect similar information pertaining to visitors and users of our Customers websites or services, solely for and on our Customers behalf.

Vine Code may collect, store and process certain Non-personal and Personal Information of Users of our Customers, solely on our Customers behalf and at their direction.

For such purposes, Vine Code serves and shall be considered as a "Processor" and not as the "Controller" (as both such capitalized terms are defined in the European Union General Data Protection Regulation) of such Users of Customers Information. The Customers controlling and operating such Websites shall be considered as the "Controllers" of such Users of Customers Information, and are responsible for complying with all laws and regulations that may apply to the collection and control of such Users of Customers Information, including all privacy and data protection laws of all relevant jurisdiction.

In this case, the Customer of Vine Code are responsible for the security, integrity and authorized usage of your Users of Customers Personal Information, and for obtaining consents, permissions and providing any fair processing notices required for the collection and usage of such information.

Vine Code cannot provide legal advice to Customers or their Users of Customers, however we do recommend that all Customers publish and maintain clear and comprehensive privacy policies on their Websites, in accordance with the applicable laws and regulations, and that all Users of Customers carefully read those policies and make sure that they consent to them.

If you are a visitor, user or customer of any of our Customers, please read the following: Vine Code has no direct relationship with the individual Users of Customers whose Personal Information it processes. If you are a visitor, user or customer of any of our Customers, and would like to make any requests or queries regarding your Personal Information, please contact such Customer(s) directly.

For example, if you wish to access, correct, amend, or delete inaccurate information processed by Vine Code on behalf of its Customer, please direct your query to the relevant Customer (who is the “Controller” of such data). If requested to remove any Users of Customers Personal Information, we will aim to respond to such request within thirty (30) days.

Examples of the type of personal information we may collect, use, store and transfer is as follows:

| | |
|-----------------------------------|--|
| IDENTITY DATA | first name, maiden name, last name, username or similar identifier, title and date of birth. |
| CONTACT DATA | billing address, delivery address, email address and telephone numbers. |
| FINANCIAL DATA | includes bank account and payment card details. |
| TRANSACTION DATA | details about payments or communications to and from you and other details of products and services you have purchased from us. |
| TECHNICAL DATA | internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website. |
| PROFILE DATA | your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses. |
| USAGE DATA | information about how you use our website, products and services. |
| MARKETING AND COMMUNICATIONS DATA | your preferences in receiving marketing from us and your communication preferences. |

3. How this information may be collected

1. Through your use of our Services. When you visit or use our Services, including when you browse the Website or any Customer Website, register a User Account, edit your Customer Website and upload information and content, and/or download and use any Vine Code software, we are aware of it and will usually gather, collect and record such uses, sessions and related information, either independently or with the help of third-party services, including through the use of “cookies” and other tracking technologies.

2. Information which you provide us voluntarily. For example, we collect Personal Information when you register to our Services; when you sign in to our Services; when you make purchases and/or register domain names through us; when you submit or upload such Personal Information as you use any of our Services; and/or when you contact us directly by any communication channel (e.g., Vine Code support tickets, or emails).

3. Third parties or publicly available sources. We may receive personal data about you from various third parties.

4. Why this information may be collected

We collect such Non-personal and Personal Information for the following purposes:

1. To provide and operate our Services;
2. To further develop, customize and improve our Services, based on Visitors and Customers preferences, experiences and difficulties;
3. To provide our Customers with ongoing assistance and technical support;
4. To be able to contact our Visitors and Customers with general or personalized service-related notices and promotional messages;
5. To facilitate, sponsor and offer certain contests, events and promotions, determine participants' eligibility, monitor performance, contact winners and grant prizes and benefits;
6. To create aggregated statistical data and other aggregated and/or inferred Non-personal Information, which we may use to provide and improve our respective services;
7. To enhance our data security and fraud prevention capabilities;
8. To consider Applicants candidacy for working at Vine Code
9. To comply with any applicable laws and regulations.

We will only use your Personal Information for the purposes set out above where we are satisfied that:

1. Our use of your Personal Information is necessary to perform a contract or take steps to enter into a contract with you (e.g. to provide you with our Services or to provide you with our customer and technical support), or
2. Our use of your Personal Information is necessary to comply with a relevant legal or regulatory obligation that we have, or
3. Our use of your Personal Information is necessary to support legitimate interests that we have as a business (for example, to maintain and improve our Services by identifying user trends and the effectiveness of Wix campaigns and identifying technical issues), provided it is conducted at all times in a way that is proportionate, and that respects your privacy rights.

Our Services are not permitted to children under 18 years of age. No one under age 18 should provide any Personal Information to us through any of our Services. We do not knowingly collect Personal Information from children under 18. Parents and/or guardians should supervise their children's online activities at all times.

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 (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

5. How we use your personal data

We have set out below a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

| PURPOSE/ACTIVITY | TYPE OF DATA | LAWFUL BASIS FOR PROCESSING INCLUDING BASIS OF LEGITIMATE INTEREST |
|--|---|--|
| To register you as a new customer | (a) Identity (b) Contact | Performance of a contract with you |
| To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us | (a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications | (a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us) |
| To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey | (a) Identity (b) Contact (c) Profile (d) Marketing and Communications | (a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services) |
| To enable you to partake in a prize draw, competition or complete a survey | (a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications | (a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business) |

| | | |
|---|--|---|
| To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) | (a) Identity (b) Contact (c) Technical | (a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation |
| To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you | (a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical | Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy) |
| To use data analytics to improve our website, products/services, marketing, customer relationships and experiences | (a) Technical (b) Usage | Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy) |
| To make suggestions and recommendations to you about goods or services that may be of interest to you | (a) Identity (b) Contact (c) Technical (d) Usage (e) Profile | Necessary for our legitimate interests (to develop our products/services and grow our business) |

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have opted in to receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company for marketing purposes.

Opting out

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message we send to you or by contacting privacy@vinecode.uk at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us for the provision of services by us to you or other transactions between us and you.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy <http://www.vinecode.uk/legal/CookiePolicy.pdf>

Change of purpose

We will only use your personal data for the purpose we collected it for, unless we consider that we need to use it for another reason that is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

6. Disclosure of your information

We may have to share your personal data with the parties set out below for the purposes
Vine Code has partnered with a number of selected service providers, whose services and solutions complement, facilitate and enhance our own.

These include hosting and server co-location services, communications and content delivery networks (CDNs), data and cyber security services, billing and payment processing services, domain name registrars, fraud detection and prevention services, web analytics, e-mail distribution and monitoring services, session recording and remote access services, performance measurement, data optimization and marketing services, content providers, and our legal and financial advisors (collectively, "Third Party Service(s)").

Such Third Party Services may receive or otherwise have access to our Visitors' and Users' Personal Information and/or Users of Customers Personal Information, in its entirety or in part – depending on each of their particular roles and purposes in facilitating and enhancing our Services and business, and may only use it for such purposes set out in the above.

External Third Parties

- Service providers based inside and outside the EEA who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.

- HM Revenue & Customs, regulators and other authorities based in the UK who require reporting of processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. We may also seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.
- Market Research Companies
- Fraud Prevention and Credit Reference Agencies to enable us to protect our rights, property, customers, or others.
- Specific third parties such as Amazon AWS, SagePay, SendGrid we use to provide services to you.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

International Transfers

Occasionally our external third parties may be based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring those third parties enter into a contract with us which obliges them to give your personal data the same protection it has in the EU. Methods of protection may include:

1. We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission or UK Government/Information Commissioner.
2. Where we use certain service providers, we may use specific contracts approved by the European Commission or UK Government/Information Commissioner which give personal data the same protection it has in Europe.
3. Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

Social Media/Framed Pages

Our Services may include certain Social Media features and widgets, single sign on features, such as the “Facebook Connect” or “Google Sign-in”, the “Facebook Like” button, the “Share this” button or other interactive mini-programs (“Social Media Features”).

These Social Media Features may collect information such as your IP address or which page you are visiting on our Website, and may set a cookie to enable them to function properly. Social Media Features are either hosted by a third party or hosted directly on our Services. Your interactions with these third parties’ Social Media Features are governed by their policies and not ours.

In addition, our Services may enable you to share your Personal Information with third parties directly, such as via page framing techniques to serve content to or from Third Party Services or other parties, while preserving the look and feel of our Website and Services ("Frames").

Please be aware that if you choose to interact or share any Personal Information via such Frames, you are in fact providing it to these third parties and not to us, and such interactions and sharing too are governed by such third parties' policies and not ours.

Publicly Accessible User Content

Our Services may include publicly accessible blogs, communities and support forums. Please be aware that any information you provide in any such areas may be read, collected, and used by others who access them.

In some cases, we may not be able to remove your Personal Information from such areas. For example, if you use a third party application to post a comment (e.g., the Facebook social plugin application) while logged in to your related profile with such third party, you must login into such application or contact its provider if you want to remove the Personal Information you posted on that platform.

We recommend against posting any information (or use any posting means to post information) you don't wish to be publicly available on these platforms.

If as a customer you upload any content via your User Account or post it on your Customer Website and provide it in any other way as part of the use of any Service, you do so at your own risk.

We have put adequate security measures in place to protect your Personal Information. However, Vine Code cannot control the actions of members of the public who may access your Content, and are not responsible for the unlawful circumvention of any privacy settings or security measures you or we may have placed on your Website (including, for instance, password-protected areas on your Customer Website).

You understand and acknowledge that, even after its removal by you or us, copies of Content may remain viewable in cached and archived pages or if any third parties (including any of your Users or Customers) have copied or stored such Content. We advise against uploading or posting any information you do not wish to be public.

Third Party Links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

7. Where we store your personal data

Data is generally held in the EEA. Vine Code may have to transfer personal data to internal or third party recipients located in another country where that country is recognised as having an equivalent level of legal protection for the rights and freedoms of the relevant data subjects.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring those third parties enter into a contract with us which obliges them to give your personal data the same protection it has in the EU.

3.2 Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

3.3 Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

8. Data Security

Vine Code has implemented security measures designed to protect the Personal Information you share with us, including physical, electronic and procedural measures.

Among other things, we offer HTTPS secure access to most areas on our Services; the transmission of sensitive payment information (such as a credit card number) through our designated purchase forms is protected by an industry standard SSL/TLS encrypted connection; and we regularly maintain a PCI DSS (Payment Card Industry Data Security Standards) certification.

We also regularly monitor our systems for possible vulnerabilities and attacks, and regularly seek new ways and Third Party Services for further enhancing the security of our Services and protection of our Visitors' and Users' privacy.

In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

Regardless of the measures and efforts taken by Vine Code, we cannot and do not guarantee the absolute protection and security of your Personal Information, your Customers Information or any other Content you upload, publish or otherwise share with Vine Code or anyone else.

We therefore encourage you to set strong passwords for your User Account and User Website, and avoid providing us or anyone with any sensitive information of which you believe its disclosure could cause you substantial or irreparable harm.

Furthermore, because certain areas on our Services are less secure than others (for example, if you set your Support forum ticket to be “Public” instead of “Private”, or if you browse to a non-SSL page), and since e-mail and instant messaging are not recognized as secure forms of communications, we request and encourage you not to share any Personal Information on any of these areas or via any of these methods.

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.

9. Data Retention

We retain personal information about our customers (including Contact, Identity, Financial and Transaction Data) for legal and tax purposes as well as our accounting and reporting requirements.

To determine the appropriate retention period for personal data, we will consider the amount and nature of the personal data, the potential risk of harm any unauthorised use or disclosure may cause, the purpose for which we process your personal data and whether we can achieve that purpose through other means. We also consider any applicable legal requirements.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

10. Your Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

1. **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
2. **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
3. **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
4. **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

5. **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
6. **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
7. **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact privacy@vinecode.uk

No fee usually required

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.

What we may need from you

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 to confirm your request in writing by email for example or for further information in relation to your request to speed up our response.

Time limit to respond

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

11. Changes to our privacy policy

We may update this Privacy Policy as required by applicable law, and to reflect changes to our information collection, usage and storage practices. Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by email. We encourage you to periodically review this page for the latest information on our privacy practices.

12. Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to Data Protection Manager, Vine Code Limited, 80 West View, Barlby Road, Selby YO8 5BD. Email: privacy@vinecode.uk

13. Third Party Privacy

Vine Code may use a number of third party providers in order to deliver the Services to customers. For information we have provided links to the third party privacy statements below.

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|---------------------------|--|
| Amazon Web Services (AWS) | https://aws.amazon.com/compliance/gdpr-center/ |
| Sendgrid | https://sendgrid.com/resource/general-data-protection-regulation/ https://sendgrid.com/policies/privacy/ |
| Google | https://privacy.google.com/businesses/compliance/#?modal_active=none https://cloud.google.com/security/gdpr/ |
| Nominet | https://registrars.nominet.uk/namespace/uk/gdpr-changes |
| OpenSRS | https://opensrs.com/the-gdpr/ |
| Freeagent | https://www.freeagent.com/company/gdpr/ |
| SagePay | https://www.sagepay.co.uk/policies |
| Mastercard (Datacash) | https://www.mastercard.co.uk/en-gb/about-mastercard/what-we-do/privacy.html |
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| GoCardless | https://gocardless.com/blog/gdpr/ https://support.gocardless.com/hc/en-gb/articles/360000281005-GoCardless-and-GDPR |
| RingCentral | https://www.ringcentral.co.uk/legal/GDPR.html |
| SE Ranking | https://seranking.com/terms-of-use.html |
| Optimizely | https://www.optimizely.com/compliance/gdpr/?redirect=uk |
| Albacross | https://albacross.com/privacy-policy/ |
| Facebook | https://www.facebook.com/policies/cookies/ https://www.facebook.com/about/privacy |
| Twitter | https://gdpr.twitter.com/en.html |

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Vine Code Limited, Registered Office: 80 West View, Barlby Road, Selby YO8 5BD.

Email: privacy@vinecode.uk