

## iGROWco PRIVACY POLICY

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### 1. WHAT IS THIS PRIVACY POLICY?

- 1.1 This privacy policy (“**Policy**”) relates to the personal data that we collect while you make use of our website [www.igrowco.com](http://www.igrowco.com) (“**Our Site**”).
- 1.2 We are committed to protecting and respecting your privacy.
- 1.3 We want to ensure you understand what information we collect about you, how we will use it and for what purpose. We are also required by data protection legislation to explain these matters to you.
- 1.4 This policy (together with our Website Terms of Use and any other documents referred to in it) therefore sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.
- 1.5 Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.
- 1.6 By visiting [www.igrowco.com](http://www.igrowco.com), you are accepting and consenting to the practices described in this policy.
- 1.7 In this Policy, a reference to a “section” means a reference to a section of this Policy.
- 1.8 For the purpose of the Data Protection Act 2018 and the General Data Protection Regulation (EU) 2016/679 (GDPR), the data controller is IGROW COMMUNITY LIMITED of 7 Bell Yard, London, WC2A 2JR, United Kingdom.

### 2. PERSONAL DATA WE MAY COLLECT FROM YOU

- 2.1 We may collect and process your data when you visit Our Site and when you use Our Site to make a purchase.
- 2.2 When you visit and use Our Site and when you browse our online store, you consent to our obtaining and processing the following information about you:
  - (a) Location data and online identifiers, including details of your visit to Our Site and the resources you access;
  - (b) Information about your computer, including your computer’s internet protocol (IP) address, operating system, and browser.
  - (c) Cookies, and other information about your general internet usage.
- 2.3 You may refuse to accept cookies from Our Site by activating the relevant settings in your browser. However, as certain parts of Our Site require the use of cookies, if you enable this setting you will be unable to access certain areas of Our Site or to make purchases through it.
- 2.4 When you sign up for our newsletter, we collect the following personal information from you;
  - (a) Your name;
  - (b) Your e-mail address; and
  - (c) Your date of birth and your children’s date of birth.
- 2.5 When you are given the option to sign up for a free digital set, we collect the following personal information from you:

- (a) Your name;
  - (b) Your e-mail address;
  - (c) The ages of the children who will be using the product purchased from Our Site, and the name of their school; and
  - (d) Your city and country.
- 2.6 When you purchase something from our on-line shop and when you open an account, as part of the buying and selling process, we collect the personal information you give us, such as:
- (a) Your name;
  - (b) Your address;
  - (c) Your e-mail address;
  - (d) Billing information;
  - (e) Contact details;
  - (f) Your date of birth and your children's date of birth;
  - (g) A record of your transactions with us; and
  - (h) Your purchase history.
- 2.7 When you use our site or make a purchase from our on-line shop ("**Services**"), we also collect the following information:
- (a) Information you provide to us through surveys you complete or competitions you enter; and
  - (b) Information about your preferences.
- 2.8 We also process information you provide to us in any correspondence and a record of any correspondence we have with you.
- 2.9 You may agree to provide us with a testimonial for Our Site. In such cases, we will be collecting the following information from you:
- (a) Your name;
  - (b) If you are below the age of 18, your age;
  - (c) If you are over 18 years of age, we will also collect the following information from you:
    - (i) Your title/profession and the company/school where you work;
    - (ii) Your school name, city and country you live in; and
    - (iii) Your website, if applicable.
  - (d) A quotation from you describing your experience in the use of the products we sell via Our Site, which may include any other personal data that you personally and voluntarily wish to include
  - (e) A photo or video of you;

Provided that your photo, video or quotation that will be included as part of the testimonial will require your explicit consent for which we will need your written confirmation (via paper or e-mail communication). In pursuance of section 5, your consent can be withdrawn at any time.

2.10 It is important that the information we hold about you is accurate in order for us to comply with our legal and regulatory obligations and also to provide you with the best possible service. We therefore request that you ensure your personal data is up to date at all times. You may update your personal data at any time from within your account settings or by contacting [info@igrowco.com](mailto:info@igrowco.com).

2.11 You are not required to provide any information to us, but if you do not, we may not be able to provide you the services requested by you.

2.12 For more information regarding your IP address and cookies, see sections 10 and 11.

### **3. WHAT DO WE DO WITH YOUR PERSONAL DATA?**

3.1 The information collected under sections 2.2 and 2.7 is used as follows:

- (a) For system administration;
- (b) To ensure your experience is fully optimized – we use it to profile you so that we can better understand your preferences and which products and offers would be most suitable for you and customers similar to you; and
- (c) To fulfil the purposes of a competition or the survey, where applicable.

Such information (apart from that submitted as part of a competition) is statistical, aggregated information and does not identify any specific individual.

3.2 The information collected under section 2.4 is used for the purpose of sending you our newsletter and related promotional information.

3.3 The information collected under section 2.5 and 2.6 is used for the following purposes:

- (a) Fulfilling your order with us or otherwise providing you with the products that you have been given the option to sign up for; and
- (b) Carrying out our obligations towards you, whether arising from law or contract.

3.4 The information collected under section 2.8 is used for the following purposes or fulfilling any request made in your communication.

3.5 The information collected under section 2.9 is used for promotional purposes and will be posted on Our Site, via [youtube.com](https://www.youtube.com). For more information about processing of personal data via third party websites, see section 7.6.

### **4. CONSENT**

4.1 When you provide us with personal information via Our Site (e.g. to complete a transaction, verify your credit card, place an order, arrange for a delivery or return a purchase), we use it for the purposes detailed above.

4.2 When you provide us with your personal information, we will also ask for your consent (which can be withdrawn at any time) for use of the personal information that we collect for other specified secondary purposes, which may include:

- (a) To send you marketing communications such as updates, newsletters, and information about offers, competitions and promotions;
- (b) To provide you with information, products or services that you request from us or which we feel may interest you; and

(c) To allow you to participate in various features of our service, when you choose to do so.

4.3 If we ask for your personal information for a secondary purpose, we will either ask you directly for your express consent, or provide you with an opportunity to say no.

4.4 You may withdraw your consent at any time by clicking the 'unsubscribe' link (and following the unsubscribe process) contained in any of our marketing communications or by contacting us at [info@igrowco.com](mailto:info@igrowco.com).

## 5. SHARING YOUR PERSONAL DATA

5.1 We will appoint certain third parties including but not limited to analytics companies, advertising agencies, risk and fraud agencies or customer service agencies to process your personal data on our behalf. In general, these third parties will only process your personal data in accordance with our instructions and we will ensure that adequate measures are in place to ensure that your personal data is processed only in accordance with this Policy and kept secure at all times. However, certain third-party service providers, such as payment gateways and other payment transaction processors, have their own privacy policies in respect to the information required for your purchase-related transactions. Once you leave Our Site's online store or are redirected to a third-party website or application, you are no longer governed by this Policy or our Website Terms of Use.

5.2 We may disclose anonymised data (such as aggregated statistics) about our in order to describe our sales, customers, traffic patterns and other information to prospective partners, advertisers, investors and other reputable third parties and for other lawful purposes, but these statistics will not contain your personal data.

5.3 We may occasionally be required by law, court order or governmental authority to disclose certain types of personal data.

5.4 We may also share your information with third parties in the following situations, to the extent permitted by law:

- (a) if we think doing so is necessary to protect the rights, property, security, or safety of us, our products, our customers, or the public;
- (b) enforce our Website Terms of Use, our Terms and Conditions of Sale and any other agreements we have in place with you;
- (c) to investigate and defend ourselves or others against any third-party claims or allegations; and
- (d) while negotiating or in relation to a business transaction, such as a merger, change of control, sale of assets, or bankruptcy.

## 6. WHERE WE TRANSFER AND STORE YOUR INFORMATION

6.1 In connection with the provision of our Services, we may need to transfer and store data (including your personal data) to our partners and subcontractors who are based outside the European Economic Area ("EEA"), including the United States of America. Where data is transferred outside of the EEA we will do so under standard contractual clauses or binding corporate rules or any other acceptable method that ensures a protection of your data to the standard required within the EEA.

6.2 If your personal data is transferred by us outside the EEA in accordance with section 6.1, we will take all reasonable steps to ensure that adequate measures are in place to keep your personal data as secure as it is within the EEA and in accordance with this Policy.

## **7. SECURITY**

7.1 We strive to protect your personal data and our Services from unauthorised access to or alteration of your personal data. This includes use of various security measures to protect your personal data held by or on behalf of us and ongoing review of our information collection, storage and processing practices.

7.2 Subject to the uses described in this Policy, we will endeavour to treat all of your personal data in strict confidence and endeavour to take all reasonable steps to keep your personal data secure once it has been transferred to our systems. However, the internet is not a secure medium and we cannot guarantee the security of any data you disclose online. You accept the inherent security risks of providing information and dealing online over the internet and will not hold us responsible for any breach of security unless this is due to our failure to ensure we have appropriate technical and organisational measures in place as required by GDPR.

7.3 If you provide us with your credit card information, the information is encrypted using secure socket layer technology (SSL) and stored with a AES-256 encryption. Although no method of transmission over the Internet or electronic storage is 100% secure, we follow all PCI-DSS requirements and implement additional generally accepted industry standards.

7.4 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.

7.5 Unfortunately, the transmission of information via the internet is not completely secure. We use reasonable endeavours to protect your personal information, and take reasonable precautions and follow industry best practices to make sure it is not inappropriately lost, misused, accessed, disclosed, altered or destroyed, but we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk.

7.6 If you link to other websites from Our Site, or if you provide a testimonial under section 2.9, then your personal data will be governed by the privacy policy of that website. We recommend that you always read any such privacy policy before interacting with a new website (or providing a testimonial, as applicable) to ensure you understand how your personal data will be used.

## **8. YOUR RIGHTS IN RESPECT OF YOUR PERSONAL DATA**

8.1 You have the following rights in relation to your personal data:

- (a) a right to access your personal data held by us;
- (b) a right to receive certain personal data in machine-readable format such as .csv (readable on Microsoft Excel or equivalent) or .pdf (readable on Adobe Acrobat or equivalent);
- (c) a right to object to processing where lawful basis is that it is in our legitimate interests, but please note that we may still process your personal data where there are other relevant lawful bases or where we have compelling grounds to continue processing your personal data in our interests which are not overridden by your rights, interests or freedoms;
- (d) a right to have inaccurate personal data rectified;

- (e) a right to have certain personal data erased where it is no longer necessary for us to process it, where you have withdrawn your consent pursuant to section 4.4, where you have objected pursuant to section 8.1.3(c), where your personal data has been unlawfully processed, or where erasing your personal data is required in accordance with a legal obligation;
  - (f) a right to request an explanation of the logic involved where we make decisions about you solely through automated means;
  - (g) a right to complain to your national data protection regulator;
  - (h) a right to object to marketing communications, which can be done in the manner provided in section 4.4 by opting-out of direct marketing. You also have a right to object to any profiling to the extent that it relates to direct marketing only.
- 8.2 If you are unsure about your rights or are concerned about how your personal data may be processed you should contact your national data protection regulator.
- 8.3 If you would like to exercise any of your rights or make a complaint regarding our use of your personal data, please e-mail [info@igrow.co.com](mailto:info@igrow.co.com). Please be aware that whilst we will try to accommodate any request you make in respect of your rights they are not absolute rights. This means that we may have to refuse your request or may only be able to comply with it in part.
- 8.4 Where you make a request in respect of your rights we will require proof of identification. We may also ask that you clarify your request. If we receive repeated requests or have reason to believe requests are being made unreasonably we reserve the right not to respond.
- 8.5 If you are unhappy with the way in which we have handled your complaint, you may escalate your complaint to the Information Commissioner's Office (ICO) by visiting [www.ico.org.uk/concerns/](http://www.ico.org.uk/concerns/) or calling (+44) 0303 123 1113.

## 9. RETAINING YOUR PERSONAL DATA

We will retain your personal data for the period necessary to provide you with Services. Where it is no longer necessary to process your personal data we will delete it. Please note, however, that we may be subject to legal and regulatory requirements to keep personal data for a longer period, in particular pursuant to any applicable statutory limitation period or for the purposes of being able to defend any claim.

## 10. IP ADDRESS

An IP address is a set of numbers which is assigned to your computer during a browsing session whenever you log on to the internet via your internet service provider or your network (if you access the internet from, for example, a computer at work). Your IP address is automatically logged by our servers and used to collect traffic data about visitors to Our Site. We also use your IP address to help diagnose problems with our server, and to administer Our Site.

## 11. COOKIES

- 11.1 A 'cookie' is a small text file that is downloaded onto the device that you use to access Our Site ("**Your Access Device**") and that enables Our Site to obtain certain information from your browser, such as your preferences. Cookies allow us to maximise your experience using Our Site by increasing its functionality and allowing Our Site to remember information and

selections as you move from page to page and from visit to visit, depending on the cookie. A cookie does not harm Your Access Device nor does it contain any viruses or other malware.

- 11.2 We use cookies to keep track of what you have in your basket, and to remember you when you return to our site. To use and purchase products through Our Site, you will need cookies enabled. If you don't wish to enable cookies, you can still make limited use of our site and use it for research purposes.
- 11.3 We do have relationships with carefully selected suppliers who may also set cookies during your visit.
- 11.4 To learn more about cookies and how to disable them we recommend you [click here](#). Furthermore, you can learn more about third party marketing cookies generally these and how to delete them [here](#).
- 11.5 By continuing to use Our Site you agree to our use of cookies.

## 12. CHILDREN

We do not knowingly collect personal information from children under the age of 13 through Our Site. If you are under 13, please do not give us any personal information and we require your parents' consent to process any of your personal data. We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce our Privacy Policy by instructing their children to never provide personal information through Our Site without their permission. If you have reason to believe that a child under the age of 13 has provided personal information to us, please contact us, and we will endeavour to delete that information from our databases.

## 13. CHANGES TO THIS PRIVACY POLICY

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 e-mail.

## 14. QUESTIONS AND CONTACT INFORMATION

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to [info@igrowco.com](mailto:info@igrowco.com) or iGrow Community, Ltd. 7 Bell Yard, London WC2A 2JR, UK.