

## MYSTUDYPAL – PRIVACY POLICY

2018/2019



**myStudyPal**

Plan. Study. Play.

## myStudyPal Privacy Principals

Our Privacy Policy is fuelled by our commitment to the following Privacy Principals:

1. We do not sell your personal data to third parties.
2. We strive to provide you with access to and control over the information you give us, and we take the protection of your information very seriously.
3. In order to comply with the incoming Digital Age of Consent, children under the age of 16 must be signed by their parent or legal guardian using the Parents Sign Up Consent Form.

### 1. What does this Privacy Policy cover?

This Privacy Policy explains how StudyPal Limited trading as myStudyPal (“we” or “MSP” or “us”) use Personal Data which we collect about you (“**Personal Data**”). Personal Data means data relating to a living individual who is or can be identified either from the data or from the data in conjunction with other information that is in, or is likely to come into, our possession, and includes personal data as described in Data Protection Legislation (as defined below).

“**Data Protection Legislation**” means the Data Protection Acts 1988 and 2003 and Directive 95/46/EC, any other applicable law or regulation relating to the processing of personal data and to privacy (including the E-Privacy Directive), as such legislation shall be amended, revised or replaced from time to time, including by operation of the General Data Protection Regulation (EU) 2016/679 (“**GDPR**”) and the Irish Data Protection Act 2018 (and laws implementing or supplementing the GDPR).

We use the words Personal Data to describe information that is about you or other living individuals, and from which you or they may become identifiable. Our aim is responsible handling of Personal Data, balancing the benefits of activities like research and data analytics with our other commitments, including transparency and non-discrimination.

This Privacy Policy describes how we use Personal Data that we collect as part of our business. Personal Data may be provided to us by you directly or by a third party. This Privacy Policy may be supplemented by other privacy notices tailored to our specific relationships with you. This is to make sure you have a full picture of how we collect and use Personal Data.

Before being provided with Personal Data we will: (a) inform the individual about the content of this Privacy Policy and any other applicable privacy notices provided to you; (b) obtain their express, explicit, unambiguous and verifiable consent to share their Personal Data with us in accordance with this Privacy Policy and other applicable privacy notices; and (c) obtain any other legally required consent, where applicable.

For the purpose of the Data Protection Legislation, we are the data controller of your Personal Data and we have entered into Data Processing Agreements with our third-party providers where applicable.

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### 2. Personal Data we may hold

The Personal Data we hold about you and other individuals may differ depending on our relationship, including the type of communications between us and the services we provide. Personal Data we may hold, and process includes:

Type of Personal Data	Examples
<b>General information</b>	Name, email address
<b>Education information</b>	Educational background and details including name and location of school, subjects studied and at what exam level, exam test results
<b>Financial information and account details</b>	Payment card number (credit or debit card), bank account number, or other financial account number, account details and other financial information.
<b>Marketing preferences, marketing activities and customer feedback</b>	Marketing preferences or responses to voluntary customer satisfaction surveys
<b>Supplemental information from other sources</b>	We and our service providers may supplement the Personal Data we collect with information obtained from other sources.
<b>Information we receive from other sources</b>	We work closely with third parties (e.g. business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search engine providers) and may receive information about you from them.

### 3. Confidentiality

We will not sell, share, or rent your personal information to any third party or use your e-mail for any unsolicited mail. Any emails sent by us will only be in connection with the provision of agreed services and products. You will always have the right to unsubscribe from any emailing list that we communicate with.

### 4. Cookies

We may collect IP addresses from visitors to our website (an IP address is a number that can uniquely identify a specific computer or other network device on the internet). This allows us to identify the location of users, to block disruptive use and to establish the number of visits from different countries. We analyse this data for trend and statistics reasons, such as which parts of our Website users are visiting and how long they spend there.

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A cookie is a small text file that is placed on your hard disk by a web server which enables a website and/or mobile app to recognise repeat users, facilitate the user's ongoing access to and use of a website and/or mobile app and allows the website and/or mobile app to track usage behaviour and compile aggregate data that will allow content improvements and targeted advertising.

We may collate information on all the website traffic that is represented in aggregate format through cookies. We may use third parties such as Google Analytics to collect user information, including through the use of cookies (flash and non-flash) and web beacons. They help us to improve the website and to deliver many of the functions that make your browser experience more user friendly. A cookie will not provide us with Personal Data, therefore if you have not supplied us with any Personal Data you can still browse the website anonymously.

You should also be aware that there are cookies which are found in other companies' internet tools which we may use to enhance the website. These websites have their own cookies, which are controlled by them, and we have no responsibility for such third party cookies.

### 5. How we use Personal Data

We use Personal Data to carry out our business activities and anonymise such Personal Data where possible. The purposes for which we use Personal Data may differ based on our relationship, including the type of communications between us and the services we provide.

The main purposes include using Personal Data to:

- 5.1 communicate with you and other individuals;
- 5.2 provide our products and services;
- 5.3 improve the quality of our products and services, provide training and maintain information security;
- 5.4 carry out research and analysis, including analysis of our customer base and other individuals whose Personal Data we collect, complete market research, including customer satisfaction surveys, and assess the risks faced by our business;
- 5.5 provide marketing information in accordance with preferences you have told us about (marketing information may be about products and services offered by our third-party partners subject to your preferences);
- 5.6 manage our business operations and IT infrastructure, in line with our internal policies and procedures, including those relating to finance and accounting; billing and collections; IT systems operation; data and website hosting; data analytics; business continuity; records management; document and print management; and auditing;
- 5.7 manage complaints, feedback and queries, and handle requests for data access or correction, or the exercise of other rights relating to Personal Data;
- 5.8 comply with applicable laws and regulatory obligations (including laws and regulations outside your country of residence), for example, laws and regulations relating to anti-money laundering, sanctions, anti-bribery and anti-terrorism; comply with legal process and court orders; and respond to requests from public and government authorities (including those outside your country of residence); and

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- 5.9 establish and defend legal rights to protect our business operations, and those of our group companies or business partners, and secure our rights, privacy, safety or property, and that of our group companies or business partners, you, or other individuals or third parties; to enforce our terms and conditions; and pursue available remedies or limit our damages.

In connection with the purposes described above, we may need to share Personal Data with third parties (this may involve third parties disclosing Personal Data to us and us disclosing Personal Data to them). These third parties may include external third-party service providers that assist us in carrying out business activities.

Where we wish to use your Personal Data in any other way, we will ensure that we notify you and get your consent first. You will be given the opportunity to withhold or withdraw your consent for the use of Your Data for purposes other than those listed in this Privacy Policy.”

### **6. Responsibility for Personal Data**

MSP is responsible for looking after Personal Data in accordance with this Privacy Policy, our internal standards and procedures, and the requirements of Data Protection Legislation.

When we provide Personal Data to third parties, the third parties will be selected carefully and will be contractually required to use appropriate measures to protect the confidentiality and security of the Personal Data pursuant to data processing agreements between us and such third parties. Those third parties will assume certain responsibilities under Data Protection Legislation for looking after the Personal Data that they receive from us.

We wish to remind you that this Privacy Policy applies to Personal Data that we collect/process as outlined herein. It does not apply to any links to third-parties' websites and/or services, such as third-party applications, that you may encounter. You acknowledge that your interaction with MSP and the services/products that we provide may enable or assist you to access the website content of, correspond with, and purchase products and services from, third parties via third-party websites and that you do so solely at your own risk. We make no representation or commitment and shall have no liability or obligation whatsoever in relation to the content or use of, or correspondence with, any such third-party website, or any transactions completed, and any contract entered into by you, with any such third party and the use by any such third-party of your Personal Data. We do not endorse or approve any third-party website nor the content of any of the third-party website made available to you. We encourage you to carefully familiarize yourself with terms of use and privacy policies applicable to any websites and/or services operated by third parties. Please be aware that we are not responsible for the privacy practices of any third parties.

**7. Sharing of Personal Data**

In connection with the purposes described above, we may need to share your Personal Data with third parties (this may involve third parties disclosing Personal Data to us and us disclosing Personal Data to them). These third parties may include:

Type of third party	Examples
<b>Our service providers</b>	External third party service providers, such as security professionals, software developers, accountants, auditors, experts, lawyers and other professional advisors; IT systems, support and hosting service providers; advertising, marketing and market research, and data analysis service providers; banks and financial institutions that service our accounts; document and records management providers; and other third party vendors and outsourced service providers that assist us in carrying out business activities.
<b>Government authorities and third parties involved in court action</b>	We may also share Personal Data with: (a) government or other public authorities (including, but not limited to, courts, regulatory bodies, law enforcement agencies, tax authorities and criminal investigations agencies); and (b) third party participants in legal proceedings and their accountants, auditors, lawyers, and other advisors and representatives, as we believe to be necessary or appropriate.
<b>Takeover</b>	<p>In the event that we sell or buy any of our business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.</p> <p>If we or substantially all of our assets are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets.</p>

**8. Processing of Personal Data**

Due to the global nature of our business, for the purposes set out above we may transfer Personal Data to parties located in other countries (including the USA and other countries that have data protection regimes which are different to those in the country where you are based, including countries which have not been found by the European Commission to provide adequate protection for Personal Data).

We may transfer information internationally to our service providers, business partners, and government or public authorities. The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“**EEA**”). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. By submitting your Personal Data, you consent to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your Personal Data is treated securely and in accordance with this Privacy Policy.

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All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our app, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

When making these transfers, we will take steps to ensure that your Personal Data is adequately protected and transferred in accordance with the requirements of Data Protection Legislation.

This may involve the use of data transfer agreements incorporating standard contractual clauses in the form approved by the European Commission or another mechanism recognised by Data Protection Legislation as ensuring an adequate level of protection for Personal Data transferred outside the EEA (for example, Privacy Shield, standard contractual clauses, binding corporate rules etc.).

For further information about these transfers and to request details of the safeguards in place, please contact us using the details below.

### **9. Security of Personal Data**

MSP uses appropriate technical, physical, legal and organisational measures, which comply with Data Protection Legislation to keep Personal Data secure.

We do our utmost to protect user privacy through the appropriate use of security technology. We restrict access to Personal Data to certain employees who need to know such Personal Data in order to operate, develop or improve the services that we provide. We ensure that we have appropriate physical and technological security measures to protect your information; and we ensure that when we outsource any processes that the service provider has appropriate security measures in place.

As most of the Personal Data we hold is stored electronically we have implemented appropriate IT security measures to ensure this Personal Data is kept secure. For example, we may use anti-virus protection systems, firewalls, and data encryption technologies. We train our staff regularly on data protection and information security.

When MSP provides Personal Data to a third party (including our service providers) or engages a third party to collect Personal Data on our behalf, the third party will be selected carefully and contractually required to use appropriate security measures to protect the confidentiality and security of Personal Data pursuant.

Unfortunately, no data transmission over the Internet or electronic data storage system can be guaranteed to be 100% secure, any transmission is at your own risk. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any Personal Data you might have sent to us has been compromised), please immediately notify us.

We are not responsible for any delays, delivery failures, or any other loss or damage resulting from (i) the transfer of data over communications networks and facilities, including the internet, or (ii) any delay or delivery failure on the part of any other service provider not contracted by us, and you acknowledge that our services may be subject to limitations, delays and other problems inherent in the use of such communications facilities. You will appreciate that we cannot guarantee the absolute prevention of cyber-attacks such as hacking, spyware and viruses. Accordingly, you will not hold us liable for any unauthorized disclosure, loss or destruction of

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Personal Data arising from such risks once we have complied with our obligations under Data Protection Legislation.

### **10. Legal justification for our use of Personal Data**

To comply with the law, we need to tell you the legal justification we rely on for using Personal Data for our purposes. While the law provides several legal justifications, the table below describes the main legal justifications that may apply to our purposes for using Personal Data.

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Purpose for use of Personal Data	Legal Justifications for use of Personal Data			
	Consent	Needed to perform a contract with you or to enter into a contract with you	Needed to comply with legal requirements	In our legitimate interests or those of a relevant third party
To provide products and services		✓		✓
To manage commercial risks			✓	✓
To carry out analysis	✓			✓
To comply with applicable laws and regulations			✓	✓
To establish and defend legal rights		✓	✓	✓
To communicate with you		✓	✓	✓
To improve the quality of our products and services, for training, and to maintain information security			✓	✓
To provide marketing information	✓			✓
To personalise your experience when using Online Materials	✓			✓
To manage our business operations and IT infrastructure		✓	✓	✓
To manage complaints, feedback and queries		✓	✓	✓

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We may obtain Personal Data to comply with applicable legal requirements, and certain Personal Data may be needed to enable us to fulfil the terms of our contract with you (or someone else), or in preparation of entering into a contract with you (or someone else). We will inform you of the purposes of the processing of Personal Data at the time that we are obtaining the Personal Data from you. In these circumstances, if you do not provide the relevant Personal Data to us, we may not be able to provide our products or services to you. If you would like further information, please contact us using the details below.

Where we rely on our legitimate business interests or the legitimate interests of a third party to justify the purposes for using Personal Data, our legitimate interests will usually be:

- 10.1 pursuit of our commercial activities and objectives, or those of a third party (for example, by carrying out direct marketing);
- 10.2 compliance with applicable legal and regulatory obligations, and any guidelines, standards and codes of conduct (for example, by carrying out background checks or otherwise preventing, detecting or investigating fraud or money laundering);
- 10.3 improvement and development of our business operations and service offering, or those of a third party;
- 10.4 protection of our business, shareholders, employees and customers, or those of a third party (for example, ensuring IT network and information security, enforcing claims, including debt collection); and
- 10.5 analysing competition in the market for our services (for example, by carrying out research, including market research).

We may need to collect, use and disclose Personal Data in connection with matters of important public interest, for instance when complying with our obligations under anti-money laundering and terrorist financing laws and regulations, and other laws and regulations aimed at preventing financial crime. In these cases, the legal justification for our use of Personal Data is that the use is necessary for matters of public interest. Additional justifications may also apply depending on the circumstances.

### **11. Retention of Personal Data**

We will keep Personal Data for as long as is necessary for the purposes for which we collect it. Where we hold Personal Data to comply with a legal or regulatory obligation, we will keep the information for at least as long as is required to comply with that obligation.

Where we hold Personal Data in order to provide a product or service, we will keep the information for at least as long as we provide the product or service, and for long as is necessary thereafter in respect of such product or service. The number of years varies depending on the nature of the product or service provided.

For further information about the period of time for which we retain Personal Data, please contact us using the details below.

## 12. Personal Data Rights

You may ask to see what Personal Data we hold about you and be provided with:

- a summary of such Personal Data and the categories of Personal Data held;
- details of the purpose for which it is being or is to be processed;
- details of the recipients or classes of recipients to whom it is or may be disclosed, including if they are overseas and what protections are used for those overseas transfers;
- details of the period for which it is held or the criteria we use to determine how long it is held;
- details of your rights, including the rights to rectification, erasure, restriction or objection to the processing;
- any information available about the source of that data;
- whether we carry out automated decision-making, or profiling, and where we do, information about the logic involved and the envisaged outcome or consequences of that decision making or profiling;
- where your Personal Data are transferred out of the EEA, what safeguards are in place.”

The following is a summary of the data protection rights available to individuals in the EEA in connection with their Personal Data. These rights may only apply in certain circumstances and are subject to certain legal exemptions.

Description	When is this right applicable?
<p><b>Right of access to Personal Data</b></p> <p>You have the right to receive a copy of the Personal Data we hold about you and information about how we use it.</p> <p>Requests for Personal Data must be made to us (see 'How to contact us' below) specifying what Personal Data you need access to, and a copy will be retained on your personnel file. To help us find the information easily, please give us as much information as possible about the type of information you would like to see.</p>	<p>This right is applicable at all times when we hold Personal Data (subject to certain exemptions).</p> <p>If, to comply with your request, we would have to disclose information relating to or identifying another person, we may need to obtain the consent of that person, if possible. If we cannot obtain consent, we may need to withhold that information or edit the data to remove the identity of that person, if possible.</p> <p>There are certain types of data which we are not obliged to disclose to you, which include Personal Data which records our intentions in relation to any negotiations with you where disclosure would be likely to prejudice those negotiations.</p>

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	<p>We are entitled to refuse a data access request from you where (i) such request is manifestly unfounded or excessive, in particular because of its repetitive character (in this case, if we decide to provide you with the Personal Data requested, we may charge you a reasonable fee to account for administrative costs of doing so), or (ii) we are entitled to do so pursuant to Data Protection Legislation.</p>
<p><b>Right to rectification of Personal Data</b></p> <p>You have the right to ask us to correct Personal Data we hold about you where it is incorrect or incomplete.</p> <p>You can require us to correct any mistakes in your Personal Data which we hold free of charge. If you would like to do this, please:</p> <ul style="list-style-type: none"> <li>• email, call or write to us (see ‘How can you contact us’ below);</li> <li>• let us have enough information to identify you (e.g. name, registration details); and</li> <li>• let us know the information that is incorrect and what it should be replaced with.</li> </ul>	<p>This right is applicable at all times when we hold Personal Data (subject to certain exemptions).</p>
<p><b>Right to erasure of Personal Data</b></p> <p>This right entitles you to request that Personal Data be deleted or removed from our systems and records. However, this right only applies in certain circumstances.</p>	<p>Examples of when this right applies to Personal Data we hold include (subject to certain exemptions):</p> <ul style="list-style-type: none"> <li>• when we no longer need the Personal Data for the purpose we collected it;</li> <li>• if you withdraw consent to our use of your information and no other legal justification supports our continued use of your information;</li> <li>• if you object to the way we use your information and we have no overriding grounds to continue using it;</li> <li>• if we have used Personal Data unlawfully; and</li> <li>• if the Personal Data needs to be erased for compliance with law.</li> </ul> <p>We may continue to process Personal Data in certain circumstances in accordance with Data Protection Legislation.</p>

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	<p>Where you have requested the erasure of Personal Data, we will inform recipients to whom that Personal Data have been disclosed, unless this proves impossible or involves disproportionate effort. We will also inform you about those recipients if you request it.</p> <p>We will erase all Personal Data after the date at which erasure has been requested.</p>
<p><b>Right to restrict processing of Personal Data</b></p> <p>You have the right to request that we suspend our use of Personal Data.</p> <p>Where we suspend our use of Personal Data we will still be permitted to store Personal Data, but any other use of this information will require your consent, subject to certain exemptions.</p>	<p>You can exercise this right if:</p> <ul style="list-style-type: none"> <li>• you think that the Personal Data we hold about you is not accurate, but this only applies for a period of time that allows us to consider if Personal Data is in fact inaccurate;</li> <li>• the processing is unlawful, and you oppose the erasure of Personal Data and request the restriction of its use instead;</li> <li>• we no longer need the Personal Data for the purposes we have used it to date, but the Personal Data is required by you in connection with legal claims; or</li> <li>• you have objected to our processing of the Personal Data and we are considering whether our reasons for processing override your objection.</li> </ul>
<p><b>Right to data portability</b></p> <p>This right allows you to obtain Personal Data in a format which enables you to transfer that Personal Data to another organisation.</p> <p>You may have the right to have Personal Data transferred by us directly to the other organisation, if this is technically feasible.</p>	<p>This right will only apply:</p> <ul style="list-style-type: none"> <li>• to Personal Data you provided to us;</li> <li>• where we have justified our use of Personal Data based on: <ul style="list-style-type: none"> <li>○ your consent; or</li> <li>○ the fulfilment by us of a contract with you; and</li> </ul> </li> <li>• if our use of Personal Data is by electronic means.</li> </ul>
<p><b>Right to object to processing of Personal Data</b></p> <p>You have the right to object to our use of your Personal Data in certain circumstances. However, we may continue to use Personal Data, despite your objection, where there are compelling legitimate grounds to do so or we need to use Personal Data in connection with any legal claims.</p>	

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<p><b>Right to ask us to stop contacting you with direct marketing</b></p> <p>You can ask us to stop contacting you for direct marketing purposes. If you would like to do this, please:</p> <ul style="list-style-type: none"> <li>• email or write to us (see ‘How can you contact us’ below). You can also click on the ‘unsubscribe’ button at the bottom of the email newsletter. It may take up to 5 days for this to take place; and</li> <li>• let us know what method of contact you are not happy with if you are unhappy with certain ways of contacting you only (for example, you may be happy for us to contact you by email but not by telephone).</li> </ul> <p>We will provide you with information on action taken on a request to stop direct marketing - this may be in the form of a response email confirming that you have ‘unsubscribed’.</p>	<p>For so long as we hold your Personal Data for direct marketing purposes.</p>
<p><b>Rights relating to automated decision making and profiling</b></p> <p>You have the right not to be subject to a decision which is based solely on automated processing (without human involvement) where that decision produces a legal effect or otherwise significantly affects you.</p> <p>This right means you can request that we involve one of our employees or representatives in the decision-making process.</p>	<p>This right is not applicable if:</p> <ul style="list-style-type: none"> <li>• we need to make the automated decision in order to enter into or fulfil a contract with you;</li> <li>• we are authorised by law to take the automated decision; or</li> </ul> <p>the decision is based on your explicit consent.</p>
<p><b>Right to withdraw consent to processing of Personal Data</b></p> <p>Where we have relied upon your consent to process Personal Data, you have the right to withdraw that consent.</p>	<p>This right only applies where we process Personal Data based upon your consent.</p>
<p><b>Right to complain to the relevant data protection authority</b></p> <p>If you think that we have processed Personal Data in a manner that is not in accordance with data protection law, please contact us in the first instance; however, you may make a complaint to the data protection regulator.</p>	<p>This right applies at any time.</p>

<p>If you live or work in an EEA member state, you may complain to the regulator in that state.</p> <p>Information about how to do this is available on the DPC website at <a href="https://www.dataprotection.ie">https://www.dataprotection.ie</a></p>	
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If you wish to exercise your rights, please contact us using the details in section 16 below.

### 13. Digital Age of Consent

In order to comply with the new Digital Age of Consent of 16, it is our policy not to collect the Personal Data of anyone below the age of 16 without their parent’s explicit consent. In order for a child under the age of 16 to use the app, they must be signed up by their parent or legal guardian using the Parent’s Sign Up & Consent Form (“**Parents Sign Up Consent Form**”). If we learn that we have collected personal data of a child under the age of 16 without their parent’s consent, we will delete the information promptly. If you believe that a child under the age of 16 may have provided us personal data, please contact us at [privacy@myStudyPal.ie](mailto:privacy@myStudyPal.ie) immediately.

### 14. Breach Reporting

We will notify serious data breaches to the Data Protection Commissioner (“**DPC**”) without undue delay, and where feasible, not later than 72 hours after having become aware of same. If notification is not made after 72 hours, we will record a reasoned justification for the delay; however, it is not necessary to notify the DPC where the Personal Data breach is unlikely to result in a risk to the rights and freedoms of natural persons. A Personal Data breach in this context means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Data transmitted, stored or otherwise processed.

We will keep a record of any data breaches, including their effects and the remedial action taken, and will notify you of any data breach affecting Personal Data (which poses a high risk to you) when we are required to do so under Data Protection Legislation. We will not be required to notify you of a data breach where:

- a) we have implemented appropriate technical and organisational measures that render the Personal Data unintelligible to anyone not authorised to access it, such as encryption; or
- b) we have taken subsequent measures which ensure that the high risk to data subjects is not likely to materialise; or
- c) it would involve disproportionate effort, in which case we may make a public communication instead.

**15. How to Contact Us about Personal Data**

If you have any comments, concerns or complaints about our use of your Personal Data, please contact us at [privacy@mystudypal.ie](mailto:privacy@mystudypal.ie). We will respond to any rights that you exercise within a month of receiving your request, unless the request is particularly complex or cumbersome, in which case we will respond within three months (we will inform you within the first month if it will take longer than one month for us to respond). Where a response is required from us within a particular time period pursuant to Data Protection Legislation, we will respond within that time period

This Privacy Policy was last updated on August 24<sup>th</sup> 2018. We may review this policy and make changes from time to time.

mystudypal may change its Privacy Policy from time to time and at its sole discretion. The date of the most recent revisions will appear on this page. If you do not agree to these changes, please do not continue to use the website to submit Personal Data. If material changes are made to the Privacy Policy, we will notify you by placing a prominent notice on our website or by sending you a notification in relation to this. We will not process Personal Data in a manner not contemplated by this Privacy Policy without your consent.