

**Last Updated: May 25<sup>th</sup>, 2018**

This is the privacy policy for [www.TrafficForce.com](http://www.TrafficForce.com), “our site” and related mobile applications.

We use your personal data for many reasons, from understanding how our users engage with and use our site to making informed decisions about our marketing and advertising.

These are the main reasons why we collect and use data about our users:

- To provide quality content;
- To provide the services you sign up for, such as subscriptions;
- To carry out marketing analysis and send you communications when we have your permission, or when permitted by law
- To enable us to show advertisements on our sites.

We think carefully about our use of personal data, and below you can find the details of what we do to protect your privacy. This policy covers, among other topics :

- Information about your rights and our obligations
- Clarity about our dealings with you and transparency about how we collect and use your personal data
- Commitments on how we protect your personal data
- Commitments on how we will facilitate your rights and respond to your questions.

We will continue to examine how we can provide more clarity to our users about our use of data.

## **About this privacy policy**

This privacy policy explains how we collect, use, share and transfer your personal data when you use the services provided on by us.

Personal data is any information about you by which you can be identified. This can include information such as:

- your name, date of birth, email address, postal address, phone number, mobile number;
- credit card and debit card details;

- information about your device (such as the IP address, which is a numerical code to identify your device that can provide information about the country, region or city where you are based); and
- information relating to your personal circumstances and how you use our sites, apps and services.

Sometimes our sites and apps may contain links to third party sites and services. These sites and services have their own privacy policies. If you follow a link to a third party, you should read the privacy policy shown on their site.

## **Who we are and how to contact us**

The data controller for our sites and apps is GLP 5, LTD, Suite 9, Ansuya Estate, Revolution Avenue, Victoria, Mahe, Seychelles. This means that we are responsible for deciding how and why we hold and use your personal data. If you want to contact us, you can find our contact details in the “How to contact us” section below.

## **What personal data we collect and how we use it**

We collect personal data when you sign up for our services and when you browse our sites or use our apps. This information is used to provide our site and other services, display advertising and analyze how visitors use our sites or apps.

The personal data we collect when you register for an account with our site.

- your email address;
- your username
- your photograph, if you add one to your profile page.

When you register for an account, we assign you a unique ID number that we use to recognize you when you are signed in to use our services. This will recognize you if you sign in using the same account on a new device or through a different application.

When you use our sites or apps we may also use cookies or similar technology to collect extra data, including:

- your IP address - a numerical code to identify your device and which can provide information about the country, region or city where you are based;
- your browsing history of the content you have visited on our sites, including information on how you were referred to our sites via another website; and
- details of your devices, for example, the unique device ID, unique advertising ID and browsers used to access our content.

Some of our services, may give you the option of providing more information about your preferences, so that we can tailor your experience. Signing up for membership may also mean you need to provide other details such as your address details. Signing up to one of our affiliate programs will mean you need to provide sufficient details such as a bank account number so that we can pay you.

We will not collect special categories of data - such as information about your race, political opinions, religion, health or sexual orientation - unless you have chosen to provide that information to us.

### *Posting comments on our sites*

When you post information on a discussion board or comment publicly on an article on one of our sites, the information you post and your username are publicly accessible. This information can be viewed online and collected by other people. We are not responsible for the way these other people use this information. When contributing to a discussion, we strongly recommend you avoid sharing any personal details, and especially information that can be used to identify you directly such as your name, age, address and name of employer. We are not responsible for the privacy of any identifiable information that you post in our online community or other public pages of the site.

### *Using our apps*

Our app uses information on the content you have viewed. You can delete this history in the settings of the app. Information on what you have viewed in the app and information on bugs and crashes is also sent to us. You can choose to receive notifications on your mobile device via the app. You can manage these notifications in the settings of the app.

## **How we collect personal data**

We collect personal data when you:

- register an account on our site;
- register as a webmaster with our affiliate program;
- submit a domain to our parking platform;
- pay for a membership;
- enter our competitions and surveys;
- sign up to our email list;
- post in our online community;
- sign up for marketing communications;
- use mobile devices to access our content;

- access our sites, through cookies and other similar technology; and
- when you contact us via email, social media, our apps or similar technologies or when you mention us on social media.

### **Why we use your personal data**

We use personal data collected through our sites and apps for a number of purposes, including the following:

- To provide the services you sign up for. We also use the personal data for related internal administrative purposes - such as our accounting and records - and to make you aware of any changes to our services.
- To send marketing communications when we have your permission, or when permitted by law.
- To personalize our services (for example, so you can sign in), remembering your settings, displaying personalized advertising as well as measuring how effective our online adverts are, recognizing you when you sign in on different devices and tailoring our marketing communications based on what you view on our site.
- To carry out marketing analysis, for example we look at what you have viewed on our sites and apps and what products and services you have bought (including what you have looked at and what products or services you have bought on our other platforms) to better understand what your interests and preferences are, and to improve our marketing by making it more relevant to your interests and preferences. You can opt out from having your personal data used for marketing analysis by emailing [dpo@trafficforce.com](mailto:dpo@trafficforce.com).
- To improve our marketing communications, we use a similar technology to cookies to confirm whether you have opened a marketing email or clicked on a link in the email.
- To sell advertising space on our sites.
- For statistical purposes such as analyzing the performance of our sites and apps and to understand how visitors use them.
- To respond to your queries and to resolve complaints.
- For security and fraud prevention, and to ensure that our sites and apps are safe and secure and used in line with our terms of use.
- To comply with applicable laws and regulations.

### *Access permissions that we ask from users of Our app*

When you use our app, we ask for the following permissions to access particular functions of your mobile device:

- For the Android version, we ask for permission to access your contact details/profile on your mobile device, so that we can add or find your Account on your phone.
- For the iOS version, we ask for permission to save pictures to your photo library, so that you can save pictures that you find in our articles on your mobile device.

### *Legal grounds for using your personal data*

We will only use your personal data where we have a legal ground to do so. We determine the legal grounds based on the purposes for which we have collected and used your personal data. In every case, the legal ground will be one of the following:

- **Consent:** For example, where you have provided your consent to receive marketing emails from us. You can withdraw your consent at any time. In the case of marketing emails you can withdraw your consent by clicking on the “unsubscribe” link at the bottom of the email or through your email preferences in the “emails and marketing” tab, when signed into your Account.
- **Our legitimate interests:** Where it is necessary for us to understand our users, promote our services and operate our sites and apps efficiently for the creation, publication and distribution of news, media and related content both online and in print form, globally. For example, we will rely on our legitimate interest when we analyze what content has been viewed on our sites and apps, so that we can understand how they are used. It is also in our legitimate interest to carry out marketing analysis to determine what products and services may be relevant to the interests of our readers. You can opt out from having your personal data used for marketing analysis by emailing [dpo@trafficforce.com](mailto:dpo@trafficforce.com).
- **Performance of a contract with you (or in order to take steps prior to entering into a contract with you):** For example, where you have purchased a membership from us and we need to use your contact details and payment information in order to process your order, or you have signed up to our affiliate program or hosted tube program and we needed to use your personal information to pay you.
- **Compliance with law:** In some cases, we may have a legal obligation to use or keep your personal data.

### *Updating your personal data and your profile page on our sites*

When you register for an account with our site, you may have access to a profile page. Under “edit profile” you can review what information is public when you comment on our content, or if people look up your profile. You can also update your information or provide extra information if you want.

## **Personal data that we receive about you from other organizations**

### *Adding to or combining the personal data you provide to us*

When you sign up for our services we may add to the personal data you give us by combining it with information shared with us by other trusted organizations. This includes, for example, information about the region that you are located in, so that we can show you the prices for memberships or other products in your local currency. We may also obtain information from partners whose offers we include in some of our marketing communications and we use this information to ensure that we do not send you irrelevant marketing.

We also use information on the content you have viewed on our sites and apps and your interaction with the content to add you to groups with similar interests and preferences, so that we can make our online advertising more relevant. Sometimes we use data about your interests or demographics that third parties have collected from you online to add to these groups. Please refer to our cookies policy (located at the end of this document) for more information on how we use cookies.

## **Data for persons under 18**

This Website is not intended for minors. You will only access the Website or register if you are at least 18-years old and have reached the age of majority in the country where you live if that age happens to be greater than 18. We prohibit all persons who do not meet the age requirements from accessing the Website. Minors will not access the Website or use its services.

We do not knowingly collect any information about children, minors, or anyone under the age of majority. Nor do we knowingly market to children, minors, or anyone under 18-years old. If you are under 18-years old, we ask that you do not submit information to us. If we become aware that a child, minor, or anyone under 18-years old has registered with us and provided us with personal information, we will take steps to cancel that person’s registration. If we do cancel a registration because you breached our no children rules, we may keep your email and IP address to make sure that you do not try to get around our rules by creating a new account.

In accordance with 47 U.S.C. § 230(d), we notify you that parental control protections (including computer hardware, software, or filtering services) are

commercially available that may assist in limiting access to material that is harmful to minors. You may find information about providers of these protections on the Internet by searching “parental control protection” or similar terms. If minors have access to your computer, please restrain their access to sexually explicit material by using any of the following products, which we provide for informational purposes only and do not endorse: CYBERSitter™ | Net Nanny® | CyberPatrol | ASACP.

## **Security of your personal data**

We have implemented appropriate technical and organizational controls to protect your personal data against unauthorized processing and against accidental loss, damage or destruction. You are responsible for choosing a secure password when we ask you to set up a password to access parts of our sites or apps. You should keep this password confidential and you should choose a password that you do not use on any other site. You should not share your password with anyone else, including anyone who works for us. Unfortunately, sending information via the internet is not completely secure. Although we will do our best to protect your personal data once with us, we cannot guarantee the security of any personal data sent to our site while still in transit and so you provide it at your own risk.

## **Who we share your personal data with**

We do not share your personal data with other people or organizations that are not directly linked or affiliated to us except under the following circumstances:

- To contractors, service providers and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our Website users is among the assets transferred.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- We may share your data with other organizations that provide services on our behalf such as dealing with online payments and other forms of payment processing, i.e. credit card transactions, online bank payments and preventing fraud.

- We may also share your data with our advertising partners, as set out in the section about Online Advertising below.
- We may reveal your personal data to any law enforcement agency, court, regulator, government authority or other organization if we are required to do so to meet a legal or regulatory obligation, or otherwise to protect our rights or the rights of anyone else.
- We may reveal your personal data to any other organization that buys, or to which we transfer all, or substantially all, of our assets and business. If this sale or transfer takes place, we will use reasonable efforts to try to make sure that the organization we transfer your personal data to uses it in line with our privacy policy.

Any organizations which access your data in the course of providing services on our behalf will be governed by strict contractual restrictions to make sure that they protect your data and keep to all data privacy laws that apply. We may also independently audit these service providers to make sure that they meet our standards.

We will not share your personal data with anyone else for their own marketing purposes unless we have your permission to do this.

Some of our webpages use social plug-ins from other organizations (such as the “Facebook Recommend” function, Twitter’s retweet function, Google+ function). These other organizations may receive and use personal data about your visit to our sites or apps. If you browse our site or view content on our apps, information they collect may be connected to your account on their site. For more information on how these organizations use personal data, please read their privacy policies.

## **Third Party-Payment Processors**

All transactions which are processed are subject to our third-party payment processor’s privacy policies. Before purchasing items or services on our site and before providing any personally identifiable information to any of our third-party payment processors you should inform yourself of the privacy policies and practices (if any) of the third-party payment processors responsible for processing your transaction, and should take those steps necessary to, in your discretion, protect your privacy. The privacy policies of our third-party payment processors shall be incorporated into this Privacy Policy by reference. You also agree that it is necessary for both us and any third-party payment processor to maintain a record of all transactions processed on this website.

## **International data transfers**

Data we collect may be transferred to, stored and processed in any country or territory where one or more of our affiliates or service providers are based or have facilities. While other countries or territories may not have the same standards of data protection as those in your home country, we will continue to protect personal data that we transfer in line with this privacy policy.

Whenever we transfer your personal data out of the European Economic Area (EEA), we ensure similar protection and put in place at least one of these safeguards:

- We will only transfer your personal data to countries that have been found to provide an adequate level of protection for personal data.
- We may also use specific approved contracts with our service providers that are based in countries outside the EEA. These contracts give your personal data the same protection it has in the EEA .
- Where we use service providers in the United States, we may transfer personal data to them if they are part of the Privacy Shield scheme, which requires them to provide a similar level of protection of your personal data to what is required in the EEA.

If you are located in the EEA, you may contact us for a copy of the safeguards which we have put in place for the transfer of your personal data outside the EEA.

## **How long we keep your personal data**

We keep your personal data for only as long as we need to. How long we need your personal data depends on what we are using it for, as set out in this privacy policy. For example, we may need to use it to answer your queries about a products or service and as a result may keep personal data while you are still using our product or services. We may also need to keep your personal data for accounting purposes, for example, where you have bought a membership. If we no longer need your data, we will delete it or make it anonymous by removing all details that identify you. If we have asked for your permission to process your personal data and we have no other lawful grounds to continue with that processing, and you withdraw your permission, we will delete your personal data. However, when you unsubscribe from marketing communications, we will keep your email address to ensure that we do not send you any marketing in future.

## **How we may contact you**

### *Service communications*

From time to time we may send you service emails, for example, telling you your membership is coming to an end or thanking you when you contribute or place an order with us.

### *Marketing communications and editorial newsletters*

If we have your permission, we may send you materials we think may interest you, such as offers and updates. Depending on your marketing preferences, this may be by email, phone, SMS or post.

You can decide not to receive these emails at any time and will be able to “unsubscribe” directly by clicking a link in the email or by emailing [dpo@trafficforce.com](mailto:dpo@trafficforce.com).

### *Responding to your queries or complaints*

If you have raised a query or a complaint with us, we may contact you to answer your query or to resolve your complaint.

## **Cookies and similar technology**

When you visit our sites or when you use our apps, we may collect personal data from you automatically using cookies or similar technology. A cookie is a small file that can be placed on your device that allows us to recognize and remember you.

This privacy policy includes our cookies policy, (located at the end of this document), where you can find details of our key advertising partners.

## **Online advertising**

Advertising on our sites that is based on cookies and similar technology

We use personalized online advertising on our sites. This allows us to deliver more relevant advertising to people who visit our site. It works by showing you adverts that are based on your browsing patterns and the way you have interacted with our sites and apps. It then shows you adverts which we believe may interest you.

When you browse our sites or use our apps, some of the cookies and similar technology we place on your device are advertising cookies, so we can understand what sort of pages you are interested in. We can then display advertising on your browser based on these interests.

We do not collect or use information such as your name, email address, postal address or phone number for personalized online advertising.

We may also share online data collected through cookies and similar technology with our advertising partners. This means that when you are on another website, you may be shown advertising based on your browsing patterns on our site. We may also show you advertising on our site based on your browsing patterns on other sites that we have obtained from our advertising partners.

Online retargeting is another form of online advertising that allows us and some of our advertising partners to show you advertising based on your browsing patterns and interactions with a site away from our sites.

For example, if you have visited the website of an online clothes shop, you may start seeing adverts from that same shopping site displaying special offers or showing you products you were browsing. This allows companies to advertise to you if you leave their website without making a purchase.

## **Advertising that we place on our site or on other sites**

We also use personalized online advertising to promote our own products and services. This means that you may see advertising for our products and services on our sites and when you are on other, third party websites, including social media platforms.

## **Your rights with regard to the personal data that we hold about you**

You can contact us with regard to the following rights in relation to your personal data:

- If you would like to have a copy of the personal data we hold on you or if you think that we hold incorrect personal data about you, please write to the Data Protection Officer at [dpo@trafficforce.com](mailto:dpo@trafficforce.com). We will deal with requests for copies of your personal data or for correction of your personal data within one month. If your request is complicated or if you have made a large number of requests, it may take us longer. We will let you know if we need longer than one month to respond. You will not have to pay a fee to obtain a copy of 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.
- Where you have provided us with consent to use your personal data, you can withdraw this at any time.
- Where applicable, you may also have a right to receive a machine-readable copy of your personal data.
- You also have the right to ask us to delete your personal data or restrict how it is used. There may be exceptions to the right to erasure for specific legal reasons which, if applicable, we will set out for you in response to your request. Where applicable, you have the right to object to processing of your personal data for certain purposes.

- If you do not want us to use your personal data for marketing analysis, you can do so by emailing [dpo@trafficforce.com](mailto:dpo@trafficforce.com).

If you want to make any of these requests, please contact [dpo@trafficforce.com](mailto:dpo@trafficforce.com).

We may need to request specific information from you to help us confirm your identity.

## **Your California privacy rights**

Under California Civil Code Section 1798.83, if you live in California and your business relationship with us is mainly for personal, family or household purposes, you may ask us about the information we release to other organizations for their marketing purposes. To make such a request, please send an email to [dpo@trafficforce.com](mailto:dpo@trafficforce.com) with “Request for California privacy information” in the subject line. You may make this type of request once every calendar year. We will email you a list of categories of personal data we revealed to other organizations for their marketing purposes in the last calendar year, along with their names and addresses. Not all personal data shared in this way is covered by Section 1798.83 of the California Civil Code.

## **Canada Privacy Rights**

We comply with Canadian Federal and Provincial privacy laws and regulations including the Personal Information Protection and Electronic Documents Act.

We will only use your personal information for the purposes intended and as detailed in this privacy policy unless we have obtained your consent to use it for other purposes.

Residents of Canada are notified that the personal information they provide to us is stored in our databases outside of Canada including in the United States and may be subject to disclosure to authorized law enforcement or government agencies in response to lawful demand under the laws of that country.

If you need to contact us about your personal information or believe that we have violated your privacy rights, please email us at [dpo@trafficforce.com](mailto:dpo@trafficforce.com). You may visit [www.priv.gc.ca](http://www.priv.gc.ca) for more information about your privacy rights.

## **Contact us for information about how we use your personal data**

If you have any questions about how we use your personal data or if you have a concern about how your personal data is used, please contact the Data Protection Officer at [dpo@trafficforce.com](mailto:dpo@trafficforce.com).

Complaints will be dealt with by the Data Protection Officer and will be responded to within 30 days.

If you are not satisfied with the way your concern has been handled, you can refer your complaint to the Information Commissioner's Office.

If you have a question about anything else, please contact us [gsc@trafficforce.com](mailto:gsc@trafficforce.com).

### **Changes to the Privacy Policy**

If we decide to change our privacy policy, we will post the changes here. If required by law, we will get your permission or give you the opportunity to opt out of any new uses of your data.

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## **Cookie Policy**

### **What is a cookie?**

A cookie is a small file that can be placed on your device that allows us to recognize and remember you. It is sent to your browser and stored on your computer's hard drive or tablet or mobile device. When you visit our sites, we may collect information from you automatically through cookies or similar technology.

### **How do we use cookies?**

We use cookies in a range of ways to improve your experience on our site, including

- Keeping you signed in
- Understanding how you use our site
- Showing you media that is relevant to you
- Showing you products and services that are relevant to you
- Working with partners to serve you relevant advertising

Ultimately, this allows us to publish media you view on our sites and apps.

In the next section, we explain in more detail how we use cookies and similar technology on our sites and apps for a number of purposes.

Other organizations also collect user information on our sites through cookies, tags and pixels. Tags and pixels, also known as web beacons, are similar to cookies but are collected through embedded images.

Using cookies and other technology allows other organizations to help us to analyze how our site is being used, measure the number of visitors to the site, and for display advertising.

Cookies that are used by us are referred to as “first-party cookies” and those that are used by our partners are “third-party cookies”. Because of how cookies work, our website cannot access third-party cookies; nor can other organizations access the data in the cookies we use on our website. There are more details about both in the following sections.

## **What types of cookies do we use ?**

We use four types of cookies, which we describe in this section.

- **Essential** – cookies that are essential to provide you with services you have requested. For example, these include the cookies that make it possible for you to stay logged into your account and make comments. If you set your browser to block these cookies, then these functions and services will not work for you. In particular, we won’t be able to save your preferences about cookies.
- **Performance** - cookies which measure how often you visit our sites and how you use them. We use this information to get a better sense of how our users engage with our content and to improve our sites and apps, so that users have a better experience. For example, we collect information about which of our pages are most frequently visited, and by which types of users. We also use third-party cookies to help with performance. For example, the Google Analytics cookie gives us information such as your journey between pages and whether you have downloaded anything (details of how to opt out of it are below).
- **Functionality** – cookies that are used to recognize you and remember your preferences or settings when you return to our site, so that we can provide you with a more personalized experience. A mix of first-party and third-party cookies are used.
- **Advertising** – cookies that are used to collect information about your visit to our site, the content you have viewed, the links you have followed and information about your browser, device and your IP address. We have set out more details on this below.

## **How do we use cookies for advertising?**

Cookies are a key part of how we deliver advertising on our sites. Among other uses, they allow us to show more relevant advertising to people who visit our site by showing you adverts that are based on your browsing patterns and the way you have interacted with our sites and apps. We can then show you adverts which we believe may interest you.

As you browse our site, some of the cookies and similar technology we place on your device are for advertising, so we can understand what sorts of pages you

read and are interested in. We can then display advertising on your browser based on these interests.

The advertising techniques we use do not collect information such as your name, email address, postal address or phone number. We sometimes use information such as your IP address and browser type and also sometimes share some limited aspects of this with third parties for advertising purposes.

We may also share online data collected through cookies and similar technology with our advertising partners. This means that when you are on another website, you may be shown advertising based on your browsing patterns on our site. We may also show you advertising on our site based on your browsing patterns on other sites that we have obtained from our advertising partners.

Online retargeting is another form of online advertising that allows us and some of our advertising partners to show you advertising based on your browsing patterns and interactions with other sites. The use of cookies may mean that when you are on another site, you may be shown advertising based on what you have looked at on our site.

Our App integrates third-party software that provides us with information about how the app is used and what content you have viewed for the purposes of online advertising and analytics, in a similar way to the sites. It uses cookies from some of the providers listed here, among others.

### **How to manage advertising cookies**

You can manage the use of cookies, including advertising cookies, and disable the sharing of data with partners for advertising purposes by using the steps set out here. In some cases you can turn off advertising cookies on a cookie-by-cookie basis, and we give the most common examples below.

You can switch some cookies off through the [Your Online Choices site](#). You may need to do this again each time you use a different IP address or device.

It is also possible to stop your browser from accepting cookies altogether by changing your browser's cookie settings. You can usually find these settings in the "options" or "preferences" menu of your browser. The following links may be helpful, or you can use the "Help" option in your browser.

- [Cookie settings in Internet Explorer](#)
- [Cookie settings in Firefox](#)
- [Cookie settings in Chrome](#)
- [Cookie settings in Safari web](#) and [iOS](#)

### **Useful links**

If you would like to find out more about privacy, cookies and their use on the internet, you may find the following links useful:

- [Microsoft cookies guide](#)
- [All About Cookies](#)
- [The Information Commissioner's Office](#)

If you would like to contact us about cookies please email [dpo@trafficforce.com](mailto:dpo@trafficforce.com)