
PRIVACY POLICY AND COOKIES

BACKGROUND:

This Policy applies as between you, the User of this Website, and D10 Limited trading as Profitab.ly, the owner and provider of this Website. This Policy applies to our use of any and all Data collected by us in relation to your use of the Website.

1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

“Data”	means collectively all information that you submit to D10 Limited via the Website. This definition shall, where applicable, incorporate the definitions provided in the Data Protection Act 1998;
“Cookie”	means a small text file placed on your computer or device by this Website when you visit certain parts of the Website and/or when you use certain features of the Website. Details of the cookies used by this Website are set out in Clause 12;
“D10 Limited”	means D10 Limited trading as Profitab.ly, 19 Royal Victoria Park, Bristol, BS10 6TD, United Kingdom;
“UK and EU Cookie Law”	means the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011;
“User”	means any third party that accesses the Website and is not employed by D10 Limited and acting in the course of their employment; and
“Website”	means the website that you are currently using (profitab.ly) and any sub-domains of this site unless expressly excluded by their own terms and conditions.

2. Scope of this Policy

This Policy applies only to the actions of D10 Limited and Users with respect to this Website. It does not extend to any websites that can be accessed from this Website including, but not limited to, any links we may provide to social media websites.

3. Data Collected

Without limitation, any of the following Data may be collected by this Website from time to time:

- 3.1 name;
- 3.2 date of birth;
- 3.3 gender;

- 3.4 job title;
- 3.5 employer information;
- 3.6 contact information such as email addresses and telephone numbers;
- 3.7 demographic information such as post code, preferences and interests;
- 3.8 financial information such as credit / debit card numbers;
- 3.9 IP address (automatically collected);
- 3.10 web browser type and version (automatically collected);
- 3.11 operating system (automatically collected);
- 3.12 a list of URLs starting with a referring site, your activity on this Website, and the site you exit to (automatically collected); and
- 3.13 information regarding third-party advertising platforms that you use.

4. Our Use of Data

- 4.1 Any personal Data you submit will be retained by D10 Limited for the time period you are using, or are subscribed to, the services of D10 Limited, and for up to 2 years afterwards.
- 4.2 Unless we are obliged or permitted by law to do so, and subject to Clause 5, your Data will not be disclosed to third parties.
- 4.3 All personal Data is stored securely in accordance with the principles of the Data Protection Act 1998. For more details on security see Clause 11 below.
- 4.4 Any or all of the above Data may be required by us from time to time in order to provide you with the best possible service and experience when using our Website. Specifically, Data may be used by us for the following reasons:
 - 4.4.1** internal record keeping;
 - 4.4.2** improvement of our products / services;
 - 4.4.3** transmission by email of promotional materials that may be of interest to you;
 - 4.4.4** contact for market research purposes which may be done using email, telephone, fax or mail. Such information may be used to customise or update the Website.

5. Third Party Websites and Services

- 5.1 D10 Limited may, from time to time, employ the services of other parties for dealing with matters that may include, but are not limited to, payment processing, fulfilment of services, delivery of items, search engine facilities, advertising and marketing. The providers of such services may have access to certain personal Data provided by Users of this Website.
- 5.2 Any Data used by such parties is used only to the extent required by them to perform the services that D10 Limited requests. Any use for other purposes is

strictly prohibited. Furthermore, any Data that is processed by third parties shall be processed within the terms of this Policy and in accordance with the Data Protection Act 1998.

6. Links to Other Websites

This Website may, from time to time, provide links to other websites. D10 Limited has no control over such websites and is in no way responsible for the content thereof. This Policy does not extend to your use of such websites. Users are advised to read the privacy policy or statement of other websites prior to using them.

7. Changes of Business Ownership and Control

D10 Limited may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of D10 Limited. Data provided by Users will, where it is relevant to any part of our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Policy, be permitted to use the Data for the purposes for which it was originally supplied to us.

8. Controlling Use of Your Data

8.1 Wherever you are required to submit Data, you may be given options to restrict our use of that Data. This may include the following:

8.1.1 use of Data for direct marketing purposes; and

8.1.2 sharing Data with third parties.

9. Your Right to Withhold Information

9.1 You may be able to access certain areas of the Website without providing any Data at all. However, to use all features and functions available on the Website you may be required to submit certain Data.

9.2 You may restrict your internet browser's use of Cookies. For more information see Clause 12.

10. Accessing your own Data

You have the right to ask for a copy of any of your personal Data held by D10 Limited (where such data is held) on payment of a small fee which will not exceed £50.

11. Security

Data security is of great importance to D10 Limited and to protect your Data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure Data collected via this Website.

12. Cookies

12.1 This Website may place and access certain first party Cookies on your computer. First party cookies are those whose domain attribute is set to “profitab.ly”, or is set to, or ends with, “.profitab.ly”. D10 Limited may use Cookies to improve your experience of using the Website and to improve our range of services. D10 Limited carefully chooses these Cookies and takes steps to ensure that your privacy is protected and respected at all times. All the first party cookies used on this Website are detailed below.

12.2 By using this Website you may receive certain third party Cookies on your computer. Third party cookies are those whose domain attribute is not set to “profitab.ly”, and is neither set to, nor ends with, “.profitab.ly”. All the third party cookies used on this Website are detailed below.

12.3 All Cookies used by this Website are used in accordance with current UK and EU Cookie Law.

12.4 The following first party Cookies may be placed on your computer:

Name of Cookie	Purpose	Strictly Necessary
_ga	For Google Analytics, used to distinguish users.	No
_gat	For Google Analytics, used to throttle request rate.	No

and the following third party Cookies may be placed on your computer: no third party cookies are used by this Website.

12.5 This Website uses analytics services provided by Google Analytics™. Website analytics refers to a set of tools used to collect and analyse usage statistics, enabling us to better understand how Users use the Website. This, in turn, enables us to improve the Website and the services offered through it. You do not have to allow us to use these Cookies, as detailed below, however whilst our use of them does not pose any risk to your privacy or your safe use of the Website, it does enable us to continually improve our business.

12.6 The analytics services used by this Website use Cookies to gather the required information.

12.7 The analytics services used by this Website use the following Cookies:

Name of Cookie	First / Third Party	Provider
_ga	First	Google Analytics
_gat	First	Google Analytics

- 12.8 You can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third party cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser.
- 12.9 You can choose to delete Cookies at any time however you may lose any information that enables you to access the Website more quickly and efficiently including, but not limited to, personalisation settings.
- 12.10 It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your internet browser if you are unsure about adjusting your privacy settings.

13. **Changes to this Policy**

D10 Limited reserves the right to change this Policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Website and you are deemed to have accepted the terms of the Policy on your first use of the Website following the alterations.