

Freeverse S.L. (Freeverse) Privacy Statement

1. Our Data Promise to you

Freeverse is absolutely committed to respecting and protecting your data whilst it is in our care. We collect your personal information because it helps us to understand your needs and guides the way in which we interact and communicate with you about our products and services now and in the future. We have strict policies and procedures in place to protect your data when you send it to us; when we process it in order to provide you with the services you have requested; or, where you have given us your permission to do so, to send you information that we think you'll find interesting, and thereafter when we store your data on our secure servers.

2. The lawful bases Freeverse process personal data

Freeverse rely upon four of these lawful ways to collect, use, store and process personal data: Consent, Contractual; Legitimate Interests and Legal Obligations

To perform our contractual obligations to you.

We and our external companies process your information to perform our contractual obligations to you when we use your information to provide you with the Services. For example, when you sign up for our services, we process your payment and contact information as necessary to confirm the subscription and we process your contact information and other details to provide you with support services in regard to your subscription.

To pursue our legitimate interests.

We process your information to meet our legitimate interests when we use your information to provide you with the Services to communicate with you and for our advertising, events and marketing purposes. In such cases we have balanced our interests with your interests and believe that these activities will not have a negative impact on your privacy rights. You can withdraw your consent at any time, by emailing info@freeverse.io.

To comply with our legal obligations.

We process and share your information as necessary to comply with our legal obligations when we use your information to protect our rights or the rights of others and when we share your information with other parties where required by law or as necessary to protect our rights. For example, we are required to collect certain information from you when processing your subscription payment for tax or financial reporting reasons.

With your consent.

We obtain your consent to process your information when we are required to do so by law. If consent is the legal basis on which we process your personal information, you can withdraw your consent at any time by emailing info@freeverse.io.

3. What Personal Data do we collect?

Freeverse collects Personal Data in a number of ways, such as when you provide details at an event or when you interact with us via a website, mobile app or other digital services (“Services”). This Personal Data could include:

- Contact information, your name; postal address; email address; phone number.
- Comments, photos, videos and other content that you choose to publish or share with us.
- Payment information for purchases made through our websites, mobile application or other digital services.
- Information we obtain from other sources, such as our business partners, and social media platforms

You may give us information about other people, such as the name and email of a contact if you are attending an event or the name and address of a gift subscription recipient. Please ensure that you are authorised or have the person’s permission to do so.

4. How do we keep it secure?

We hold your personal data on our secure systems, mainly based in Spain and the European Economic Area (EEA). Our staff are trained in data security, and our staff policies and procedures help our staff to understand what is required of them under their obligations to us, and also their responsibilities under GDPR and other privacy legislation.

When we ask another organisation to provide a service for us, we ensure that they have appropriate security measures in place. If we or our service providers transfer any information out of the European Economic Area (EEA), it will only be transferred with the correct protection in place. This includes the use of Model Contractual Arrangements as approved by the European Commission and the EU-US Privacy Shield.

5. How do we collect Personal Data?

We may collect your details when you register on one of our websites; sign-up to our service; correspond with us by phone, e-mail or otherwise; participate in discussion boards or other social media functions on our website; enter a competition or promotion; apply for a job.

We will always be transparent about how we plan to use your data so that you have the choice whether or not to give it to us. We respect your preferences and will do our best to make sure that we keep our promises.

We may need to authenticate your identity to provide you with access to subscriber-only services.

Our iPad, Android and other "apps" may collect user data, which we use to learn about our readers and improve our apps.

To understand how our "apps" are used we may use the service Google Analytics to provide us with anonymous statistical information about your use of our app(s).

We use this information for reporting purposes and to advertise online. Third-party vendors, including Google, may show your ads on sites across the Internet. We may use the cookies relating to Google Analytics together with third party cookies to inform, optimise and serve ads based on a user's past visits to our websites. For more information please see our [Cookie Policy](#).

6. How do we use your Personal Data?

Fulfilment of a service

We will use your personal data when fulfilling a product or service that you have requested. For example, signing up for the Freeverse Marketplace.

Marketing

We will only send you direct marketing when you have either provided consent for example by ticking a box or where we believe we can demonstrate a legitimate interest and have balanced this with your interests and privacy. You can opt out of receiving direct marketing at any time by or emailing info@freeverse.io.

7. Do we share that data with any other companies?

Except as otherwise stated in this Privacy Policy or in the data collection statements that will always be visible when we collect your information and where we give you the opportunity to select your preferences, we may release your data to external companies that we use to process your orders, to supply you with a prize in the event you win a competition, or charge your credit card, for instance. Every supplier we use has to go through a rigorous up-front process to ensure that their processes are at least as good as our own, and they are required to sign a contract that defines what their responsibilities and liabilities are. .

Please take care when using social networking sites to which we may invite you to join that you do not disclose anything that you might later wish to retract.

There are certain times when we may have a legal obligation to disclose your data in good faith where it is required by law or to respond to subpoenas or warrants served on us, or where we have a requirement to protect or defend the rights of Freeverse or any users of our servers. We will always ensure that those requesting the information have the legal right to do so.

If another company should acquire any of our companies or our assets, including our database, that company will have the right of possession to the Personal Data collected by us and will assume the rights and obligations formerly attributable to us and will use the data in line with the terms under which you submitted it or as described in this Privacy Policy.

8. Leaving our website and moving on to third party websites

When you click on advertisements or links on any of our sites, you will leave that site and go to a third-party site, which is outside of our control. When we place an advertisement on one of our sites, it does not signify that we are endorsing that advertiser's product or service. We do not accept responsibility for content, which we have no control over, and our Privacy

Policy does not apply to these companies, sites or content; and if such third-party sites collect Personal Data, we cannot control how this data is processed, stored or used. We advise that you read their data collection statements, which accompany any registration and their Privacy Policies, before you submit your personal information.

8. Cookies and how we use them

"Cookies" are small pieces of information that a website sends to your computer's hard drive while you are viewing a website. Freeverse may use cookies for a number of reasons:

- To provide you with a more personal and interactive experience on our sites.
- For statistical purposes to track how many users we have and how often they visit our websites.
- We use analytics to collect anonymous user information so they can analyse how the website is being used and the number of visitors.
- We and our advertisers may use statistical cookies to track who has seen an advert and clicked on it.
- To show you adverts that you may be interested in and to control the number of times you see them and measure the effectiveness of the ad campaign.
- We may use 'Flash' cookies to store your preference for your media player. If we do not use them, it may not be possible for you to watch some video content.

You have the ability to accept or decline cookies, when you use the website for the first time via "see all options" link on the "pop up" banner, but please be aware that for some parts of our sites to work, you will need to accept cookies.

For more information about third party cookies generated by advertisers, please visit www.allaboutcookies.org and/or www.youronlinechoices.com

For more information on how the Freeverse use cookies please read our [Cookie Policy](#).

9. Opting out on Receipt of Email Marketing Communications

Email

If you receive a marketing email from one of our brands, you may choose to opt-out from receiving future emails by sending an email to info@freeverse.io.

10. Marketing to Children

We do not knowingly collect personal information from children under the age of 16 for marketing purposes.

11. Using our websites from outside the EEA

Our servers are situated in the EEA and when you submit your details and in whichever country you are situated you agree to the data being transferred to the EEA and processed under the terms of GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003 which stem from European Directives 95/46/EC and 2002/58/EC

respectively. If you are not in agreement please do not add your personal details on the website.

12. How you can gain access to the personal data we collect about you

Under GDPR, you have a number of rights, which are aimed at giving you control about how your personal data is used by us.

Access your personal data

You have the right to see what information we hold about you and the purposes for which we are using it. This is known as a Subject Access Request. In responding to such a request, we may ask for proof of your identity, to ensure that we do not send you personal data to another person. We will respond to any requests as soon as possible, but at least within 30 days.

Please email info@freeverse.io to make a Subject Access Request

Amend your personal data

You may ask us to make any changes that you consider necessary to make the information accurate, please let us know and we will rectify this as soon as possible. Please email info@freeverse.io with your request.

We will require that you satisfactorily identify yourself to demonstrate your entitlement to view this data.

Delete your personal data

If you wish for your personal data to be deleted we will review any request on a case-by-case basis. We will respond to you as soon as possible, at least within 30 days of receiving your request.

13. How long do we keep your personal data?

We hold personal data for different purposes and the length of time we keep your information will vary depending on the services or products we are providing. We will only keep your data for a reasonable period of time, which is based on the purpose for which we are using your data. Once that purpose has been fulfilled, we will securely delete that data or anonymise your information (so that we, or anyone else, can no longer tell that data relates to you) unless we are required to retain the data longer for legal, tax or accounting reasons.

14. Questions regarding this Privacy Policy

If you have comments or questions related to this Privacy Policy please email info@freeverse.io and we will respond as promptly and as fully as we can.

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 response you should refer your complaint to the ICO ico.org.uk/concerns/

21. Changes to this Privacy Policy

This Privacy Policy will be amended from time-to-time if we make any important changes in the way that we collect, store and use personal data. We may notify you by sending an email to your last known email address. Our dispatch of a communication to you will, in any event, constitute notification.

Any changes will be effective immediately.

This Privacy Policy was last revised in July 2021