

CreatorSEO, Jovian Ltd., knows that you care how personal information about you is used and shared between commercial businesses and we appreciate that you trust in us to maintain your personal information carefully, sensibly and legally. This notice describes our Privacy Policy and forms part of our website Terms and Conditions ("Website Terms") which should be read inconjunction with this Privacy Policy.

By accepting our Website Terms or by visiting www.CreatorSEO.com ("the Website") you are accepting and consenting to the practices described in this Privacy Policy.

Introduction

The Website is brought to you by CreatorSEO, Jovian Ltd. (CreatorSEO). CreatorSEO believes it is important to protect your Personal Data (as defined in the Data Protection Act 1988 (as amended)) and we are committed to providing you with a personalized service that meets your needs in a way that also protects your privacy.

This Privacy Policy explains how we may collect Personal Data about you. It also explains some of the security measures we take to protect your Personal Data.

1. Collecting Information

We may collect Personal Data about you from a number of sources, including the following:

- 1. When you agree to take a service or product from CreatorSEO, Jovian Ltd, this may include your processing of your contact details, date of birth, method of payment and bank details etc., as applicable.
- 2. When you contact us with an enquiry or in response to a communication from us, which will help tell us something about how you use our services so that we can be of greater assistance in fulfilling your customer requirements.
- 3. Information which is available to the public, such as the electoral register, for market research purposes or service improvement.



2. Using Your Personal Information

- 2.1 Personal Data about our customers is an important part of our business and we shall only use your Personal Data for the following purposes and shall not keep such Personal Data longer than is necessary to fulfill these purposes:
 - 2.1.1. To help us to identify you when you contact us.
 - 2.1.2. To help us to identify accounts, services and/or products which you could have from us or selected partners from time to time. We may do this by automatic means using a scoring system, which uses the Personal Data you have provided and/or any information we hold about you and Personal Data from third party agencies (including credit reference agencies).
 - 2.1.3. To help us to administer and to contact you about improved administration of any accounts, services and products we have provided in the past or may provide in the future.
 - 2.1.4. To allow us to carry out marketing analysis and customer profiling (including transactional information), conduct research, including creating statistical and testing information.
 - 2.1.5. To help to prevent and detect fraud, loss or any illegal activity.
 - 2.1.6. To allow us to contact you in any way (including mail, email, telephone, visit, text or multimedia messages) about products and services offered by us and selected partners unless you have previously asked us not to do so.
 - 2.1.7. We may monitor and record communications with you (including phone conversations and emails) for quality assurance and compliance.
 - 2.1.8. We may check your details with fraud prevention agencies. If it is suspected that false or inaccurate information has been provided and fraudulent activity is suspected, this will be recorded.
- 2.2. We will not disclose your Personal Data to any third party except in accordance with this Privacy Policy.
- 2.3. We may allow other organizations or statutory or regulatory bodies access to your Personal Data in the following circumstances:



- 2.3.1. If we, or substantially all of our assets, are acquired or are in the process of being acquired by a third party, in which case Personal Data held by us, about our customers, will be one of the transferred assets.
- 2.3.2 If we have been legitimately asked to provide information for legal or regulatory purposes or as part of legal proceedings or prospective legal proceedings.
- 2.3.3. If we employ companies and individuals to perform functions on our behalf, we may disclose your Personal Data to these parties for the purposes set out in clause 2.1 or, for example, for fulfilling orders, delivering packages, sending postal mail and email, removing repetitive information from customer lists, analyzing data, providing marketing assistance, providing search results and links (including paid listings and links), processing credit and debit card payments and providing customer service. Those parties are bound by strict contractual provisions with us and only have access to Personal Data needed to perform their functions, and may not use it for other purposes. Further, they must process the Personal Data in accordance with this Privacy Policy and as permitted by the Data Protection Act 1988 (as amended). From time to time, these individuals or organizations to whom we may pass your Personal Data may be outside the European Economic Area (EEA). We will take all steps reasonably necessary to ensure that your Personal Data is treated securely and in accordance with this Privacy Policy and the Data Protection Act 1988 (as amended).
- 2.4. Where you give us Personal Data on behalf of someone else, you confirm that you have provided them with the information set out in this Privacy Policy and the Website Terms and that they have not objected to such use of their Personal Data. Per the Website Terms it is preferable that parties only act on their own behalf. However where this is not possible under reasonable circumstances, explicit consent from any third party is required prior to the entering of their Personal Data in our system.
- 2.5. In connection with any transaction which we enter into with you:
 - 2.5.1. We, and other companies in our group, may carry out credit and fraud prevention checks with one or more licensed credit reference and fraud prevention agencies. Record may be kept of such a search by the relevant parties. Information held about you by these agencies may be linked to records relating to other people living at the same address with whom you are financially linked. These records will also be taken into account in credit and fraud prevention checks. Information from your application and payment details of your account will be recorded with one or more of these agencies and may be shared with other organizations to help make credit and insurance decisions about you and members of your household with whom you are financially linked and for debt collection and fraud prevention. This includes those who have moved house and who have missed payments.
 - 2.5.2. If you provide false or inaccurate information to us and we suspect fraud, we will record this and may share it with relevant statutory or regulatory bodies. We, and other credit and insurance organizations, may also use technology to detect and



prevent fraud

2.5.3. If you need details of those credit agencies and fraud prevention agencies from which we obtain and with which we record information about you, please write to our Data Protection Manager at CreatorSEO, Fia Rua, Deerpark, Bunratty, Co. Clare, Ireland.

3. Direct Marketing – Opt Out

When Personal Data is obtained from you when you take a new service or product from us, we will give you the opportunity to decide whether or not you want to receive information from us about other services or products (as applicable). You can normally do this by ticking the applicable box on any of our application/subscription forms or contracts. You may change your mind at any time by emailing us at the address below.

4. Protecting Information

We employ strict security measures to protect Personal Data as per the following examples;

- 4.1. We work to protect the security of your information during transmission by using Secure Sockets Layer (SSL) software, which encrypts information you input.
- 4.2. We reveal only the last five digits of your credit card numbers when confirming an order. Of course, we transmit the entire credit card number to the appropriate credit card company during order processing.
- 4.3. We maintain physical, electronic and procedural safeguards in connection with the collection, storage and disclosure of personally identifiable customer information. Our security procedures mean that we may occasionally request proof of identity before we disclose personal information to you.
- 4.4. It is important for you to protect against unauthorized access to your password and to your computer. We advise you to sign off when you finish using a shared computer.

5. The Internet

5.1. Please remember that communications over the Internet, such as emails and webmail's (messages sent through a website), are not secure unless they have been encrypted. Your communications may go through a number of countries before they are delivered - this is the



nature of the Internet. We cannot accept responsibility for any unauthorized access or loss of Personal Data that is beyond our control.

- 5.2. We may use 'cookies' to monitor how people use our site. This helps us to understand how our customers and potential customers use our website so we can develop and improve the design, layout and function of the sites. A cookie is a piece of information that is stored on your computer's hard drive through your browser, to recognize your browser and which records which you have used on a website. This means that when you go back to that website, it can give you tailored options based on the information it has stored about your last visit. You can normally alter the settings of your browser to prevent it from accepting cookies.
- 5.3. If you do not want us to use cookies in your browser, you can set your browser to reject cookies or to tell you when a website tries to put a cookie on your computer. However, you may not be able to use some of the products or services on our website without cookies.

6. Turning off Cookies in Different Browsers

The Help menu on the menu bar of most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie and how to disable cookies altogether. Additionally, you can disable or delete similar data used by browser add-ons, such as Flash cookies, by changing the add-ons settings or visiting the website of its manufacturer.

7. Links

- 7.1. The Website may include third-party advertising and links to other websites. We do not provide any personally identifiable customer Personal Data to these advertisers or third-party websites.
- 7.2. These third-party websites and advertisers, or Internet advertising companies working on their behalf, sometimes use technology to send (or "serve") the advertisements that appear on the Website directly to your browser. They automatically receive your IP address when this happens.

They may also use cookies, JavaScript, web beacons (also known as action tags or single-pixel gifs), and other technologies to measure the effectiveness of their ads and to personalize advertising content. We do not have access to or control over cookies or other features that they may use, and the information practices of these advertisers and third-party websites are not covered by this Privacy Policy. Please contact them directly for more information about their privacy practices. In addition, the Network Advertising Initiative offers useful information about Internet advertising companies (also called "ad networks" or



"network advertisers"), including information about how to opt-out of their information collection.

7.3. We exclude all liability for loss that you may incur when using these third party websites.

8. Further Information

- 8.1. If you would like any more information or you have any comments about our Privacy Policy, please either write to us at Data Protection Manager, CreatorSEO, Fia Rua, Deerpark, Bunratty, Co. Clare, Ireland or email us at info@CreatorSEO.com.
- 8.2. We may amend this Privacy Policy from time to time without notice to you, in which case, we will publish the amended version on the Website. You confirm that we shall not be liable to you or any third party for any change to this Privacy Policy from time to time. It is your responsibility to check regularly to determine whether this Privacy Policy has changed.
- 8.3. You may request a copy of this Privacy Policy and any amendments made thereto by writing to the above address or by emailing us at editorial@CreatorSEO.com.
- 8.4. If you would like access to the Personal Data that we hold about you, you can do this by emailing us at info@CreatorSEO.com or writing to us at the address noted above.
- 8.5. We aim to keep the Personal Data we hold about you accurate and up to date. If you tell us that we are holding any inaccurate Personal Data about you, we will delete it or correct it promptly. Please email us at info@CreatorSEO.com or write to us at the address above to update your Personal Data.

www.creatorseo.com