

## Privacy policy

### 1. Introduction

- 1.1 We are committed to safeguarding the privacy of our customers, partners and website visitors. In this policy we explain how we will treat your personal information.
- 1.2 By using our website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.

### 2. Collecting personal information

- 2.1 We may collect, store and use the following kinds of personal information:
- (a) information about your computer and about your visits to and use of this website (including your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths);
  - (b) information that you provide to us when registering with our website (including your email address);
  - (c) information that you provide when completing your profile on our website (including your name, profile pictures, gender, date of birth, educational details and employment details);
  - (d) information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters (including your name and email address);
  - (e) information that you provide to us when using the services on our website, or that is generated in the course of the use of those services;
  - (f) information relating to any purchases you make of our services or any other transactions that you enter into through our website;
  - (g) information that you post to our website for publication on the internet including your name, your profile pictures and the content of your posts;
  - (h) information contained in or relating to any communication that you send to us or send through our website including the communication content and metadata associated with the communication; and
  - (i) any other personal information that you choose to send to us.
- 2.2 Before you disclose to us the personal information of another person, you must obtain that person's consent to both the disclosure and the processing of that personal information in accordance with this policy.

### 3. Using personal information

- 3.1 Personal information submitted to us through our website will be used for the purposes specified in this policy or on the relevant pages of the website.
- 3.2 We may use your personal information to:

- (a) administer our website and business;
  - (b) personalise our website for you;
  - (c) enable your use of the services available on our website;
  - (e) supply to you services purchased through our website;
  - (f) send statements, invoices and payment reminders to you, and collect payments from you;
  - (g) send you non-marketing commercial communications;
  - (h) send you email notifications that you have specifically requested;
  - (i) send you our email newsletter, if you have requested it. You can inform us at any time if you no longer require the newsletter;
  - (j) send you marketing communications relating to our business or the businesses of carefully-selected third parties which we think may be of interest to you, by post or, where you have specifically agreed to this, by email or similar technology. You can inform us at any time if you no longer require marketing communications;
  - (k) provide third parties with statistical information about our users but those third parties will not be able to identify any individual user from that information;
  - (l) deal with enquiries and complaints made by or about you relating to our website;
  - (m) keep our website secure and prevent fraud;
  - (n) verify compliance with the terms and conditions governing the use of our website (including monitoring private messages sent through our website private messaging service); and
- 3.3 If you submit personal information for publication on our website, we will publish and otherwise use that information in accordance with the licence you grant to us.
- 3.5 We will not, without your express consent, supply your personal information to any third party for the purpose of their or any other third party's direct marketing.
- 3.6 All our website financial transactions are handled through our payment services provider, PayPal. You can review the provider's privacy policy at <https://www.paypal.com/uk/webapps/mpp/ua/privacy-full#top>. We will share information with our payment services provider only to the extent necessary for the purposes of processing payments you make via our website, refunding such payments and dealing with complaints and queries relating to such payments and refunds.
- 4. Disclosing personal information**
- 4.1 We may disclose your personal information to any of our employees, officers, insurers, professional advisers, agents, suppliers or subcontractors insofar as reasonably necessary.

- 4.2 We may disclose your personal information to any member of our group of companies this means any subsidiary or associated company, insofar as necessary
- 4.3 We may disclose your personal information:
- (a) to the extent that we are required to do so by law;
  - (b) in connection with any ongoing or prospective legal proceedings;
  - (c) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk);
  - (d) to the purchaser (or prospective purchaser) of any business or asset that we are, or are contemplating, selling; and
  - (e) to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.
- 4.4 Except as provided in this policy, we will not provide your personal information to third parties.

## **5. International data transfers**

- 5.1 Information that we collect may be stored and processed in and transferred between any of the countries in which we operate in order to enable us to use the information in accordance with this policy.
- 5.2 Information that we collect may be transferred to countries which do not have data protection laws equivalent to those in force in the European Economic Area such as USA, Russia, and China,
- 5.3 Personal information that you publish on our website or submit for publication on our website may be available, via the internet, around the world. We cannot prevent the use or misuse of such information by others.
- 5.4 You expressly agree to the transfers of personal information described in this Section.

## **6. Retaining personal information**

- 6.1 This Section sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal information.
- 6.2 Personal information that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 6.3 Without prejudice to Section 6.2, we will usually delete personal data falling within the categories set out below at the date/time set out below:
- (a) Customer personal data will be deleted after 12 months of inactivity
  - (b) Sales contacts personal data will be deleted after 36 months of inactivity

- (c) Partner and trainee personal data will be deleted after 36 months of inactivity
  - (d) Employee personal data will be deleted 7 years from leaving the Company
- 6.4 Notwithstanding the other provisions of this Section 6, we will retain documents (including electronic documents) containing personal data:
- (a) to the extent that we are required to do so by law;
  - (b) if we believe that the documents may be relevant to any ongoing or prospective legal proceedings; and
  - (c) in order to establish, exercise or defend our legal rights including providing information to others for the purposes of fraud prevention and reducing credit risk.

## **7. Security of personal information**

- 7.1 We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.
- 7.2 We will store all the personal information you provide on our secure (password- and firewall-protected) servers.
- 7.3 All electronic financial transactions entered into through our website will be protected by encryption technology.
- 7.4 You acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.
- 7.5 You are responsible for keeping the password you use for accessing our website confidential; we will not ask you for your password except when you log in to our website.

## **8. Amendments**

- 8.1 We may update this policy from time to time by publishing a new version on our website.
- 8.2 You should check this page occasionally to ensure you are happy with any changes to this policy.
- 8.3 We may notify you of changes to this policy by email or through the private messaging system on our website.

## **9. Your rights**

- 9.1 You may instruct us at any time not to process your personal information for marketing purposes.
- 9.2 In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.

## **10. Third party websites**

- 10.1 Our website includes hyperlinks to, and details of, third party websites.

10.2 We have no control over, and are not responsible for, the privacy policies and practices of third parties.

**11. Updating information**

11.1 Please let us know if the personal information that we hold about you needs to be corrected or updated.

**12. Cookies**

12.1 Our website uses cookies

12.3 We use both session and persistent cookies on our website

12.4 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

12.5 You may delete or block any of our cookies. Deleting or blocking cookies may have a negative impact on the usability of our website(s).

12.6 The names of the cookies that we use on our website, and the purposes for which they are used, are listed at the end of this document.

**13. Data protection registration**

13.1 We are registered as a data controller with the UK Information Commissioner's Office.

13.2 Our data protection registration number is ZA157076.

**14. Our details**

14.1 Our websites are operated by Buyto (<http://www.buyto.es/> )

14.2 We are registered in England and Wales under registration number 3941124; and our registered office is at

20 Rolleston Road  
Holbury, Southampton  
Hampshire, SO45 2GB, UK

14.3 You can contact us by writing to the business address given above, or

- using our website contact form, <http://www.tflonline.co.uk/component/contact/contact/1.html?Itemid=214>
- by email to [support@tflonline.com](mailto:support@tflonline.com)

### Cookies that we may use

Cookie	Name	Purpose
Cookie preference	civicCookieControl	This cookie is used to remember a user’s choice about cookies on our web sites. Where users have previously indicated a preference, that user’s preference will be stored in this cookie.
Google Analytics	_utma	These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.
	_utmb	<a href="#">Read Google's overview of privacy and safeguarding data</a>
	_utmc	
	_utmz	
Security breach notification form cookie	ASP.NET_SessionId	This cookie is essential for the breach notification form – the form that public electronic communications service providers use to notify us of a security breach – to operate. It is set only for those people using the form. This cookie is deleted when you close your browser.  <a href="#">Visit the Microsoft website</a>
YouTube cookies		We embed videos from our official YouTube channel using YouTube’s privacy-enhanced mode. This mode may set cookies on your computer once you click on the YouTube video player, but YouTube will not store personally-identifiable cookie information for playbacks of embedded videos using the privacy-enhanced mode.  <a href="#">Read more at YouTube’s embedding videos information page.</a>
Third-party security service	incap_ses_*	We use a third-party service to filter out malicious requests. This service may set the following cookies:
	visid_incap_*	
	__utmva*	- incap_ses_* - expires at the end of your session
	__utm vb*	- visid_incap_* - expires after two years
	__utmvm*	- __utmva*, __utm vb*, __utmvm* - expires after 15 minutes