



## **Privacy Policy**

---

This privacy policy is GDPR compliant and applies to this Site only, and not to other Spina Warriors websites on the World Wide Web. Please read the privacy policy of the site you are visiting when you leave this Site. Please do not use this site if you do not agree with this policy.

Spina Warriors Community Interest Company ("us", "we", or "our") operates the <https://www.spinawarriors.org.uk> website (the "Service").

In this page, you will find information about how we collect, use, and disclose your personal information and what choices you have about it.

Our goal is to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy. As per our Terms and Conditions, which can be accessed at <https://www.spinawarriors.org.uk/>, terms used in this Privacy Policy are the same as those in our Terms and Conditions.

### **Definitions**

#### **Personal Data**

Data about living individuals that can be identified from those data (or from those and other information in our possession or likely to be in our possession).

#### **Usage Data**

Usage Data is data collected automatically either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

#### **Cookies**

Cookies are small pieces of data stored on a User's device.

We may use "cookies" on our websites and online services at Spina Warriors Community Interest Companies. In addition to allowing, you to use our shopping cart and to personalise your experience on our sites, cookies help us measure the effectiveness of our ads and web searches, and they give us insight into user behaviour so that we can improve our products and communications.

Because cookies are used throughout our websites, disabling them may prevent you from using certain parts of the sites.

The cookies used on our websites have been categorised based on the guidelines found in the ICC UK Cookie guide. We use the following categories on our websites and other online services:

#### **Category 1 — Strictly Necessary Cookies**

These cookies are essential to enable you to browse through our websites and use their features. Without these cookies, services like shopping baskets and e-billing cannot be provided.



## **Privacy Policy**

---

### **Category 2 — Performance Cookies**

These cookies collect information about how you use our websites — for instance, which pages you go to most. This data may be used to help optimise our websites and make them easier for you to navigate. These cookies are also used to let affiliates know if you came to one of our websites from an affiliate and if your visit resulted in the use or purchase of a product or service from us, including details of the product or service purchased. These cookies don't collect information that identifies you. All information these cookies collect is aggregated and therefore anonymous.

### **Category 3 — Functionality Cookies**

These cookies allow our websites to remember choices you make while browsing. For instance, we may store your geographic location in a cookie to ensure that we show you our website localised for your area. We may also remember preferences such as text size, fonts, and other customizable site elements. They may also be used to keep track of what featured products or videos have been viewed to avoid repetition. The information these cookies collect will not personally identify you, and they cannot track your browsing activity on non-Apple websites.

### **Data Controller**

Data Controller means a person who (either alone or jointly or in common with other persons) determines the purposes for which and the way any personal data are, or are to be, processed.

For this Privacy Policy, we are a Data Controller of your data.

### **Data Processor (or Service Providers)**

Data Processor (or Service Provider) means any person (other than an employee of the Data Controller) who processes the data on behalf of the Data Controller.

We may use the services of various Service Providers to process your data more effectively.

### **Data Subject**

An individual who is subject to Personal Data is referred to as a Data Subject.

### **User**

The User is the individual who uses our Service. The User corresponds to the Data Subject, who is the subject of Personal Data.

### **Information collection and use**

We collect several different types of information for various purposes to provide and improve our Service to you.

### **Types of data collected**



## Privacy Policy

---

### Personal Data

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personally identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Phone Number
- Address
- Cookies and usage data

We may use your Personal Data to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in any email we send.

### Usage Data

We may also collect information how the Service is accessed and used ("Usage Data"). This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

### Tracking and Cookies data

We use cookies and similar tracking technologies to track the activity on our Service and hold certain information.

Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyse our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

Examples of Cookies we use:

- Session Cookies. We use Session Cookies to operate our Service.
- Preference Cookies. We use Preference Cookies to remember your preferences and various settings.
- Security Cookies. We use Security Cookies for security purposes.

### Use of Data

Spina Warriors Community Interest Company uses the collected data for various purposes:

- To provide and maintain our Service.
- To notify you about changes to our Service.
- To allow you to participate in interactive features of our Service when you choose to do so.



## Privacy Policy

---

- To provide customer support.
- To gather analysis or valuable information so that we can improve our Service.
- To monitor the usage of our Service
- To detect, prevent and address technical issues.
- To provide you with news, special offers and general information about other goods, services, and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information.

### Retention of Data

Spina Warriors CIC will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

Spina Warriors CIC will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

### Transfer Of Data

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country, or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside United Kingdom and choose to provide information to us, please note that we transfer the data, including Personal Data, to United Kingdom and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Spina Warriors CIC will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

### Disclosure of data

#### Disclosure for Law Enforcement

Under certain circumstances, Spina Warriors CIC may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

#### Legal requirements

Spina Warriors CIC may disclose your Personal Data in the good faith belief that such action is necessary to:



## Privacy Policy

---

- To comply with a legal obligation
- To prevent or investigate possible wrongdoing in connection with the Service.
- To protect the personal safety of users of the Service or the public
- To protect against legal liability

## Security Of Data

The security of your data is important to us but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

## Your Rights

Spina Warriors CIC aims to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

Whenever made possible, you can update your Personal Data directly within your account settings section. If you are unable to change your Personal Data, please contact us to make the required changes.

If you wish to be informed what Personal Data, we hold about you and if you want it to be removed from our systems, please contact us.

In certain circumstances, you have the right:

- To access and receive a copy of the Personal Data we hold about you.
- To rectify any Personal Data held about you that is inaccurate.
- To request the deletion of Personal Data held about you.
- You have the right to data portability for the information you provide to Spina Warriors CIC.
- You can request to obtain a copy of your Personal Data in a commonly used electronic format so that you can manage and move it.

Please note that we may ask you to verify your identity before responding to such requests.

## Analytics

We may use third-party Service Providers to monitor and analyse the use of our Service.

- Google Analytics

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity.



## Privacy Policy

---

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <http://www.google.com/intl/en/policies/privacy/>.

### Behavioural Remarketing

Spina Warriors CIC uses remarketing services to advertise on third party websites to you after you visited our Service. We and our third-party vendors use cookies to inform, optimize and serve ads based on your past visits to our Service.

- Google AdWords

Google AdWords remarketing service is provided by Google Inc.

You can opt-out of Google Analytics for Display Advertising and customize the Google Display Network ads by visiting the Google Ads Settings page: <http://www.google.com/settings/ads>.

Google also recommends installing the Google Analytics Opt-out Browser Add-on - <https://tools.google.com/dlpage/gaoptout> - for your web browser. Google Analytics Opt-out Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics.

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <http://www.google.com/intl/en/policies/privacy/>

### Payments

We may provide paid products and/or services within the Service. In that case, we use third-party services for payment processing (e.g. payment processors).

We will not store or collect your payment card details. That information is provided directly to our third-party payment processors whose use of your personal information is governed by their Privacy Policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, Mastercard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

The payment processors we work with are:

- Stripe - Their Privacy Policy can be viewed at <https://stripe.com/us/privacy>
- PayPal - Their Privacy Policy can be viewed at <https://www.paypal.com/webapps/mpp/ua/privacy-full>

### Links To Other Sites

Our Service may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.



## **Privacy Policy**

---

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

### **Changes To This Privacy Policy**

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

### **Contact Us**

If you have any questions about this Privacy Policy, please contact us:

- By email: [info@spinawarriors.org.uk](mailto:info@spinawarriors.org.uk)
- By Visiting this page on our website: <https://www.spinawarriors.org.uk/contact>
- By Mail: Gascoyne House, Moseleys Farm Business Centre, Fornham All Saints, Bury St Edmunds, IP28 6JY