

Set2Grow Data Protection Policy(Website)

Set2Grow respects your right to confidentiality and to the privacy of the information you entrust to us. As part of this fundamental obligation, we are committed to the appropriate protection and use of your Personal Data that we collect from you and to complying with our obligations under the Data Protection Act 2018 and the General Data Protection Regulation ((EU) 2016/679) ("**Data Protection Law**").

We are classified as a "Controller" under Data Protection Law in respect of certain Personal Data you furnish to us.

This Privacy Policy describes how we handle and protect your Personal Data in connection with the services we provide, in our capacity as Data Controllers.

1. What is Personal Data?

"Personal Data" is any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier such as a user IP addresses or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person and includes Special Categories of Personal Data.

"Special Categories of Personal Data" is any Personal Data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership; data concerning health or sex life and sexual orientation; genetic data or biometric data.

2. Types of Information Collected and Processed

We collect and process Personal Data relating to you in connection to our relationship with you. This Personal Data may include your name, mailing address, e-mail address, telephone number, fax number and psychometric, personality or survey results. [For instance, by registering for Set2Grow's newsletters or alerts, you agree to receive the correspondence to which you have subscribed at the e-mail address that you provided at registration. Only Set2Grow or its agents will contact you using this e-mail address.]

We may also collect and process certain non-Personal Data from you such as statistical and other analytical information collected on an aggregate basis of all visitors to our website. This non-Personal Data comprises information that cannot be used to identify or contact you, such as demographic information regarding, for example, user IP addresses where they have been clipped or anonymised, browser types and other anonymous statistical data involving the use of our website.

3. Technical Data Collected

When you visit our website, we gather statistical and other analytical information collected on an aggregate basis of all visitors to our website. This Non-Personal Data comprises



information that cannot be used to identify or contact you, such as demographic information regarding, for example, user IP addresses where they have been clipped or anonymised, browser types and other anonymous statistical data involving the use of our website.

4. Sources of Personal Data

We collect data from you and from the following sources:

- our website
- emails you send us or that we exchange
- completed online psychometric, personality or survey results

5. Purposes for which we hold your information

We use the non-Personal Data gathered from visitors to our website in an aggregate form to get a better understanding of where our visitors come from and to help us give a better user experience.

The Personal Data that is referred to above will be processed for the purposes of:

- contacting you if required to respond to any communications you might send to us;
- providing our services to you on the basis of your engagement with us;
- [providing you results, reports or feedback related to online surveys completed

Note: If at any time you would like to unsubscribe from receiving future emails, we include detailed unsubscribe instructions at the bottom of each mailing.

6. How we secure your Personal Data

Your Personal Data is held on secure servers in Ireland which are hosted by WIX. The nature of the Internet is such that we cannot guarantee or warrant the security of any information you transmit to us via the Internet. No data transmission over the Internet can be guaranteed to be 100% secure. However, we will take all reasonable steps (including appropriate technical and organisational measures) to protect your Personal Data.

7. Your Rights

You have the following rights, in certain circumstances and subject to certain restrictions, in relation to your Personal Data:

- The right to access your Personal Data;
- The right to request the rectification and/or erasure of your Personal Data;
- The right to restrict the use of your Personal Data;
- The right to object to the processing of your Personal Data;
- The right to be forgotten in certain circumstances; and
- The right to receive your Personal Data, which you have provided to us, in a structured, commonly used and machine-readable format or to require us to transmit that data to another controller.



You may inform us of any changes in your Personal Data, and in accordance with our obligations under Data Protection Law, we will update or delete your Personal Data accordingly. To find out what Personal Data we hold on you, to request a copy of your personal data, to have your Personal Data updated, amended or removed from our database or to exercise of the other rights set out above, please contact us at info@set2grow.com

8. About cookies

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

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.

9. Cookies that we use

We use cookies for the following purposes:

- (a) [status - we use cookies [to help us to determine if you are logged into our website]] (cookies used for this purpose are: [smSession](#));
- (b) [security - we use cookies [as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally]] (cookies used for this purpose are: [hs](#), [incap_ses_\\${Proxy-ID}_\\${Site-ID}](#), [incap_visid_\\${Proxy-ID}_\\${Site-ID}](#), [nlbi_{ID}](#), [XSRF-TOKEN](#));
- (c) [analysis - we use cookies [to help us to analyse the use and performance of our website and services]] (cookies used for this purpose are: [svSession](#)));

10. How long we retain your Personal Data

We will not hold your Personal Data for longer than is necessary. We retain your Personal Data for as long as we need it for the purposes described in this Privacy Policy (including but not limited to section 6 (Disclosure of your Personal Data to third parties)), or to comply with any applicable law or regulation, a summons, a search warrant, a court or regulatory order, or other statutory requirement.

11. Links to Other Web Sites

This Privacy Policy applies only to Set2Grow. Our website may contain links to other web sites not operated or controlled by Set2Grow (the “**Third Party Sites**”). The policies and procedures



we describe here do not apply to the Third Party Sites and we are not responsible for Third Party Sites' content, any use of the Third Party Sites. We suggest contacting those sites directly for information on their privacy policies.

12. Changes to our Policies

We reserve the right to make changes to our Privacy Policy at any time without prior consultation. Any changes to the website privacy statement or any changes to this Website Privacy Policy will be posted on this website so you are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. If at any time we decide to use Personal Data in a manner significantly different from that stated in this Website Privacy Policy, or otherwise disclosed to you at the time it was collected, we will notify you by e-mail, and you will have a choice as to whether or not we use your Personal Data in the new manner.

13. Enforcement of this Privacy Statement

This website is owned and operated by Set2Grow.

We are registered in Ireland under CRO number 144373 and our registered office is at Patrick's Well, Tibbradden Lane, Dublin 16, D16 C6P0, Ireland.

If you have any questions regarding this Privacy Policy, you may contact us using the information below:

Address:

Patrick's Well, Tibbradden Lane, Dublin 16, D16 C6P0, Ireland.

Email Address:

info@set2grow.com

You have the right to lodge a complaint with the Data Protection Commission and they may be contacted at (<https://www.dataprotection.ie/docs/Contact-us/11.htm>).

