

# Privacy Policy of Ply

## Scope

This Privacy Policy sets out how we collect and manage personal information and the steps we take to protect it. This Privacy Policy operates in addition to our obligation of confidentiality to you if you are our client. Your use of the Ply website and Application indicates that you accept this Privacy Policy and approve the collection, use and disclosure by Ply, of your personal information according to the terms below.

The current version of the policy will be posted to the Ply Application and at [www.ply.life](http://www.ply.life) website. This policy will be made available to all staff at Ply. The policy is reviewed annually or as changes are required.

## What is personal information?

Personal information means information or an opinion, whether true or not and whether recorded in a material form or not, about an individual who is identified or reasonably identifiable.

The type of personal information we collect about you depends on the type of dealings we have with you. You provide most of your personal information directly to us and for a specific purpose. When we collect personal information, we will whenever practical, outline why this information is being collected. We will only record personal information when you:

- a. Register an account
- b. Complete your personal details
- c. Complete the personal profile section within the Application
- d. send us a message (e.g. in the contact us section on the Ply website or Application),
- e. ask us to provide you with services – including as a client,
- f. make a comment on a Ply webpage forum,
- g. ask to receive newsletters/updates,
- h. ask to obtain resources such as promotional materials,
- i. complete a feedback form,
- j. provide a specific submission to the website (e.g. questions, tips, feedback etc).

We use the personal data you provide only to the extent that your data is necessary for rendering or processing our services. We store your data for as long as is necessary to achieve the intended purpose or until you delete your account or for as long as legal retention periods require data to be stored. Your data is subsequently deleted in accordance with legal

requirements or processing is restricted. In the case of use purely for information, i.e. if you do not register or send us information another way, we only collect personal data which your browser transfers to our servers. If you want to view our website, we collect data, which we require for technical purposes in order to show you our content and guarantee stability and security (legal basis is a legitimate interest pursuant to Article 6 (1) (f) GDPR). The collection of data for website provision and the storage of data in log files is imperative for website and operation. Consequently, users may not object to this.

### **Use of information**

Ply uses the information we collect and receive as below:-

- a. To provide services
- b. To customize your experience
- c. To protect you and the services
- d. To improve our services
- e. To communicate with you
- f. To process your subscription

Ply does not sell your information. Ply may aggregate the information you and others make available in connection with Ply services and share it with third parties. Ply may use, sell, license, and share this aggregated information with third parties for research, business or other purposes such as to improve knowledge of our client base and of the Ply services.

### **Cookies.**

To improve our web service and make your experience as comfortable as possible, we use cookies, tracking pixels, or similar technologies. Cookies are small text files saved on your computer when you visit our website. They help us recognize your browser as yours. Cookies save information such as your language settings or the duration of your visit to our website. They save data entries you make on the website, like when you log in, so you don't need to enter your data each time you use our services. Cookies help us to recognize your preferences and adjust our website to your areas of interest.

Cookies do not identify individual users. When you visit the Ply website, our servers may record information about your usage, the time of your visit, its duration, the pages you visit and style settings. Ply does not collect information which can identify individuals who visit the site. Rather, when you visit the Ply website Google Analytics compiles data that record and log your visit with the following information collected for strictly statistical purposes only:

- a. the user's server address,
- b. the user's top level domain name (for example, .com, .gov, .ie, .eu etc),
- c. the date and time of the visit to the site,
- d. the pages accessed and documents downloaded,
- e. the search words and referral sites used,
- f. the type of browser used.

Access to, and use of, this information is restricted to Ply. We do track your browsing activity so that we can improve our service delivery. No attempt will be made by Ply to identify individual users except:

- a. where we have obtained consent from the individual user to do so; or
- b. where we have a legal obligation to do so, for example if a law enforcement agency executes a warrant to inspect Google Analytics logs. Ply will only use statistics obtained from cookies to ascertain and follow website usage to enable improvements, updates and maintenance of pages of the website.

### **Protection of personal information**

We take steps as are reasonable in the circumstances to ensure that personal information is protected from misuse, interference, loss, unauthorised access, modification and disclosure. However, no data transmission over the Internet is totally secure. Although Ply strives to protect such information, Ply gives no warranty and cannot ensure the security of any information which you send online. Accordingly, any information which you transmit to Ply via the Internet is transmitted at your own risk.

### **Credit card information**

We do not store any credit card information on our servers.

### **Access and Correction**

You generally have a right to have access to your personal information and to seek its correction, if it is inaccurate, out of date, incomplete, irrelevant or misleading, subject to some exceptions permitted by law. If you wish to have access to your personal information or ask that it be corrected or deleted, please contact us. We will respond to access and correction requests within a reasonable period. We may deny your request in some circumstances, but only if we are legally entitled to do so. We will give you a written explanation for any denial of an access or correction request.

### **Legal Rights**

If you are habitually located in the EEA, you have the right to access, rectify, download or erase your information, as well as the right to restrict and object to certain processing of your information

## **GDPR**

We adhere to the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, known as the General Data Protection Regulation (the "GDPR"). For users in the United Kingdom, we adhere to the GDPR as enshrined in the Data Protection Act 2018.

Under the GDPR, you have the following rights:

- a. Right to be informed;
- b. Right of access;
- c. Right to rectification;
- d. Right to erasure;
- e. Right to restrict processing;
- f. Right to data portability; and
- g. Right to object.

## **Complaints**

If you have a complaint about how we have collected or handled your personal information, please contact Ply at [hello@ply.life](mailto:hello@ply.life). We will investigate your complaint and communicate the outcome of our investigation within a reasonable time. If you feel we have not addressed your concern in a satisfactory manner you may contact a supervisory authority. You also have the right to directly make a complaint to a supervisory authority. You can lodge a complaint with a supervisory authority by contacting the Data Protection Commission

## **Contact Us**

If you wish to access your personal information or have any questions about our Privacy Policy, please contact [hello@ply.life](mailto:hello@ply.life).

Dun Laoghaire, Dublin, Ireland

Email: [hello@ply.life](mailto:hello@ply.life)