

## **Privacy and Cookie Policy**

Date of Last Revision: **March 18, 2019**

**Closing The Gap LTD** (hereinafter referred to as the "Company") manages <https://reasoningmathshub.co.uk> and this privacy policy applies to the user of the company's services or resources (hereinafter referred to as the "Users").

The purpose of this Privacy Policy (hereinafter referred to as the "**Policy**"), which may be amended from time to time, aims to provide you with an understanding on how we collect, use and disclose the information you provide to us. The Company takes proactive action to ensure that the necessary steps are taken to protect the privacy of its users throughout their visiting experience.

By accessing the website, you consent to the collection and use of your Personal Data as described in the policy. Please do not visit this website if you do not agree with the terms set out herein. If you are using the services or accessing the website on behalf of someone else (such as your child, relative, friend, associate) or an entity (such as your employer), you hereby and warrant represent that you are authorised by such individual or entity to accept this policy on such individual's or entity's behalf.

Any consent on your part is entirely voluntary but if you do not grant the requested consent to the processing of your Personal Data, the use of this service may not be permissible.

**The Company** ("us", "we", or "our") operates the website and service (the "Service") and will be the "controller", as defined in the Directive and the GDPR.

### **Information we collect**

The information may be divided into the following general categories:

#### **1. Information you provide to us**

When you register with this website or access the website or avail the Services, we may ask you to voluntarily provide us certain information that helps facilitate your use of the platform and helps us stay compliant with our Legal obligations.

##### **1.1 Personal Information**

When you register with this website or access the website or avail the Services, we may ask you to voluntarily provide us certain information that personally identifies you or could be used to personally identify your entity ("**Personal Information**"). Personal Information may include (but is not limited to) the following categories of information: age, gender, first and last name, birth date, or any other physical address, contact number, email or other contact information and

other relevant data as desired by us. Questions or comments which you submit may also be regarded as Personal Information.

### **1.2 Communications with us and other Members**

When you communicate with us or use the Platform to communicate with other Members, we collect information about your communication and any information you choose to provide. We collect this information for the purposes of maintaining safety, ensuring quality, and optimising our services.

### **1.3 Order/Credit Information**

While using our Service for making a payment, we may ask you to provide us with certain information that will help us to process the order. Information may include, but is not limited to, your name, address, email address and phone number(s).

## **2. Information which we automatically collect**

When you register with this website or access the website or avail the Services, we may automatically collect certain information that helps facilitate your use of the platform and helps us stay compliant with our Legal obligations. We may also collect certain information from third-parties when you access the website of a third party or avail the services of a third party.

### **2.1 Non-Personal Information**

We may additionally collect and track Non-Personal Information about your website visit including the domain name and the name of the web page from which you use our Services, the time you spend on each of our web pages, the Internet Protocol (IP) address associated with your computer, operating system and platform, transaction history, web pages you viewed, information searched for or requested for and other relevant statistics.

Your messages can be stored to process it, to compile statistical information, to improve our services and support, or to get in touch with you.

This information will be used for the purposes of improving our operations and Services.

### **2.2 Billing, Collection and Payment Information**

When you make a payment through our site, your payment information is processed by a payment processing partner. With your payment authorisation, they may collect provided payment information necessary to process your payment. The associated partner may use and store information it collects through its payment processor; which is governed by its applicable terms of service and privacy policy. We may receive certain information from the associated payment processor which will help us facilitate your order/payment and your use of the platform.

## **How we use the Information**

We use the personal information you provided to us along with automatically collected information we receive to facilitate and optimise your use of the platform. This conducted by us through, but not limited to customisation, website development, maintaining a safe environment and compliance to our legal obligation.

### **1. Facilitate your use of the Platform**

We use the information we collect about you to establish your account and provide services; provide customised content to you; communicate with you through email and phone, send you Emails to inform you about our new products, services and offers; promotional messages and web analytics data, provide feedback to third party businesses; and take action regarding unlawful or harmful activities. You may opt out of the promotional emails anytime by intimating us of your preferences.

### **2. Promote and Customise the Platform**

We may use your email address or phone number (if provided) to contact you regarding any changes to the platform; system maintenance and outage issues; account issues; or otherwise to troubleshoot problems. We may also send you information about related services and selected third party information.

### **3. Creating a Safer Platform**

We may limit or restrict your use of our website and its associated features in response to possible signs of abuse. We may remove content, under our own discretion, that may be illegal or we may deem as inappropriate. As a result of these actions, we may further suspend or disable your account due to violations against our preset Terms and Conditions and/or Privacy Policy.

### **4. Disclaimer**

We do not sell, rent or trade your personal information to third parties for marketing purposes. The user hereby agrees and understands that this obligation does not include passing on your information to trusted third parties who assists us in operating our website/application, conducting our business, or in provision of services to you, but we ensure that these parties agree to keep this information confidential. Non-personal identifiable visitor information may be provided to other parties for marketing, advertising, or other uses.

## **Disclosure of your Information**

We may disclose your information to third parties; as stated below, which helps us facilitate your use of the platform and helps us comply with our legal obligations. By using this website,

you hereby give us the permission to disclose your information as per the terms of this policy. We will never sell your personal information or pass it to third parties for marketing purposes without your permission.

### **1. Business Transactions**

We may disclose your personal information:

- If we are approached by a potential buyer of our business;
- If we are required to do so by law or in good-faith believing such action is necessary to comply with the law.
- In case of a sale of assets, a bankruptcy, or an insolvency event, then we may sell, transfer or share some or all of our assets, including your information to another party.

In such events, we will notify you before your personal information is transferred and/or becomes subject to a different privacy policy.

### **2. Legal Obligations**

We will disclose your Information, as collected subject to the terms of this policy, where we are required to do so by law, under a subpoena, or if we believe that such action is necessary to comply with the law. We may also disclose personal information to protect the security or integrity of our service on reasonable requests from law enforcement agency.

### **3. Data Processor**

We may disclose your personal information with associated third parties such as our subcontractors or our service providers who act on our behalf. We may also use a third-party data processor to process your information on our behalf. They may be identified as follows:

#### **3.1 Service Providers**

We, in the course of the business, employ third party companies and/or individuals to facilitate the provision of our services, to provide the service on our behalf, to perform services which are related to our services, or to assist us in analysing the usage of our service. These third parties will be provided with access to your personal information for the sole purpose of performing these tasks, as mentioned, on our behalf and are obligated not to disclose or use it for any other purpose.

#### **3.2 Communications**

We may use your personal information to contact or inform you with newsletters, promotional materials and/or 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 of the emails we have sent.

### **3.3 Payment Provider**

To facilitate the payment process, we may provide a third-party payment provider with relevant personal information to processes all payments you may make on our website.

### **3.4 Analytics Information**

In addition, we collect, monitor and analyse information in order to increase our Service and website's functionality and we may use third party services, including but not limited to, Google Analytics. Please go through these third-party service provider's privacy policies which addresses how they use such information.

## **Other Important Information**

### **1. Retention Period**

The information collected namely personal information, log data, analytical information, location information and other information as stated in this policy will be retained by Company for the period wherein the data is essential for achieving the purpose of data processing.

### **2. Links to other website/applications**

This privacy policy applies to our website and services. The website may contain links to other website or applications over which we have no control over and thus not responsible for. These website or applications may have their own policies regarding privacy which may be different than ours. We are not responsible for the privacy policies or practices of other website or applications which you access from this website or application. If you choose to visit an individual, a business, or advertiser's website/application by "clicking on," or subsequently redirected to a third-party link located on our website/application, you will be directed to that third party's website/application and subject to their terms & agreement and privacy policy. When we link a website/application or present an advertisement, it is not an endorsement, authorisation or representation of our affiliation with that third party, nor is it an endorsement of any such third party's privacy security policies or practices.

If you access the stated linked websites/applications, you are at your own risk. It is best practice to check the privacy policies, if available, of those individual website/applications to see how the operators of those third-party website/applications will disclose or use your personal information. This privacy policy only applies to the information we collect and does not applies information that is collected by these third parties.

### **3. Access/Accuracy**

We aim to maintain accuracy of the personal information which you provide us at all times and if you seek to update or correct such Information for any reason, please update this directly yourself or send updates/corrections to us at [reasoningmathshub@gmail.com](mailto:reasoningmathshub@gmail.com). Company aims to take all reasonable efforts to incorporate such changes in your Personal Information within a reasonable period of time.

### **4. Children's Privacy**

Protecting the privacy of every minor is equally important to us. The website and Services are not structured to attract minor children less than sixteen (16) years and you hereby acknowledge that you are above the age of sixteen (16) years while availing the Services.

### **5. Governing Law**

This privacy policy has been construed in accordance with and shall be governed by the laws prevalent in province of London, United Kingdom and the provisions of GDPR.

## **Cookie Policy**

### **1. Cookie Policy**

This website uses cookies to enhance the user's experience on our website. Where applicable, this website uses a cookie control system allowing the user to choose whether to allow the use of cookies on their computer / device on their first visit. This policy complies with recent legislation requirements for websites to obtain explicit consent from users before leaving behind or reading files such as cookies on a user's computer / device.

The cookies in use can be categorised as follows:

#### **1.1. Analytical cookies**

Analytical cookies anonymously remember your computer or mobile device when you visit our website. They keep track of browsing patterns and build up a profile of how our readers use the website. We might use the given information to display relevant advertisements to you on our websites.

#### **1.2. Product cookies**

Product cookies help us to make our website work as efficiently as possible such as remembering your registration and login details, remembering your settings preferences, and metering the number of pages you are viewing for the purpose of administering subscriptions.

### **1.3. Third party cookies**

Third party cookies such as advertising and analytics cookies are placed by or on behalf of independent advertisers who are advertising on our website. These cookies may be placed within the advertisement or elsewhere on our site. They are anonymous cookies and hence cannot identify individuals. These cookies are used for statistical analysis and allow the advertiser to ascertain the number of people who have seen their advertisement or have seen it more than once. These cookies also help the advertisers to tailor advertising to you when you visit other websites. The user hereby agrees and understands that we have no access to such cookies. These third parties' privacy policy applies on such cookies.

## **2. Disabling Cookies**

If you would like to restrict the use of cookies, you can control this function in your internet browser. Links to steps on how to do this for the most popular Internet browsers are provided below for your convenience. We are not liable for any information provided on these third-party websites.

### **2.1 Internet Explorer**

Link: <http://windows.microsoft.com/en-GB/windows7/Block-enable-or-allow-cookies>

### **2.2 Google Chrome**

Link: [https://support.google.com/chrome/bin/answer.py?hl=en-GB&answer=95647&p=cpn\\_cookies](https://support.google.com/chrome/bin/answer.py?hl=en-GB&answer=95647&p=cpn_cookies)

### **2.3 Mozilla Firefox**

Link: <http://support.mozilla.org/en-US/kb/Blocking%20cookies>

### **2.4 Apple Safari**

Link: <http://docs.info.apple.com/article.html?artnum=32467>

## **Data Subject's Rights**

GDPR, to which we adhere to in its entirety, provides for rights of the Data Subject. You, as the Data Subject, have a right to require information about your data being processed and correction of any incorrect data. You also have the right to lodge a complaint with a supervisory authority, right of Data Erasure, Data Portability and Right to Access subject to the provisions of GDPR. The information, within the meaning of this clause, shall be provided free of charge unless the request is "manifestly unfounded or excessive".

### **Updates to Privacy Policy**

We reserve the right to modify this privacy policy at any time. All changes made to this privacy policy will be posted on our website, as a blog post, by email, or through any method we determine. The most recent privacy policy will be posted first and will be identified at the top of this privacy policy page by its effective date.

Please review the changes carefully. If you disagree with the privacy policy, you must stop using the services provided by this website and the website/application all together.

### **Contact Us**

If you have any questions about this Privacy Policy or for exercising the right of Data Erasure, Data Portability and Right to Access subject to the provisions of GDPR, please contact us at [reasoningmathshub@gmail.com](mailto:reasoningmathshub@gmail.com).