



# THINK AND SPEAK

## Privacy policy

### A. Introduction

The privacy of our website visitors is very important to us and we are committed to protecting it. This policy explains what we do with your personal data. By consenting to the use of cookies in accordance with the terms of this policy on your first visit to our website, we are able to use cookies with each subsequent visit to our website.

### B. Collection of Personal Data

The following types of personal data may be collected, stored and used:

- computer information, including your IP address, geographic location, browser type and version, and operating system;
- information about your visits to and use of this website, including referral source, length of visit, page views and site navigation paths;
- information, such as the e-mail address, that you provide when registering on our website;
- information you enter when creating a profile on our site - for example, your name, profile pictures, gender, birthdate, relationship status, interests and hobbies, educational and employment data;
- information, such as your name and e-mail address, that you provide to set up subscriptions to our e-mails or newsletters;
- information that you enter when using the services on our website;
- information that is generated when you use our website, including when, how often and under what circumstances you use it;
- information regarding everything you buy, services you use or transactions made through our website, including your name, address, telephone number, email address and credit card details;
- information that you post on our website with the intention of publishing it on the internet, including your username, profile pictures and the content of your posts;
- information contained in any correspondence you send to us by e-mail or through our website, including communication content and metadata;
- any other personal information that you submit to us.

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.



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### C. Using Your Personal Information

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

- administering our website and business;
- personalizing our website for you;
- enabling the use of services available on our website;
- sending you goods purchased through our website;
- provide services purchased through our website;
- send statements, invoices and payment reminders to you, and collect payments from you;
- sending you non-marketing commercial communications;
- sending you email notifications that you have requested;
- sending our e-mail newsletter, if you have requested it (you can inform us at any time if you no longer wish to receive the newsletter);
- send you marketing communications relating to our business or the activities of carefully selected third parties that we believe may be of interest to you, by post or, if you have consented to this, by email or similar technology (you can let us know at any time if you no longer wish to receive communications marketing);
- 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);
- deal with inquiries and complaints made by or about you relating to our website;
- ensuring the security of our website and preventing fraud;
- verifying compliance with the terms of use of our website (including monitoring private messages sent through our private messaging service); and
- other uses.

If you submit personal information for publication on our site, we will publish it and otherwise use it in accordance with the license granted to us.

Your privacy settings can be used to limit the publication of your information on our website and can be adjusted using the website privacy controls.

We will not pass your personal data to third parties or any other related third parties for direct marketing purposes without your express consent.



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### **D. Disclosure of Personal Information**

We may disclose your personal information to any of our employees, officers, agents, suppliers or subcontractors as necessary for the purposes set out in this Privacy Policy. We may disclose personal information to any member of our group of companies (ie, subsidiaries, main holding company and its subsidiaries) as necessary for the purposes set out in this Privacy Policy.

We may disclose your personal data:

to the extent that it is required by law;

in connection with any ongoing or potential legal proceedings;

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);

the buyer (or prospective acquirer) of any business or asset that we sell (or are contemplating); and

to any person who we reasonably believe may apply to a court or other competent authority for disclosure of such personal information where, in our reasonable opinion, such court or authority is reasonably likely to order disclosure of such personal information

Except as provided in this Privacy Policy, we will not provide your information to third parties.

### **E. International data transfers**

The information we collect may be stored and processed in any of the countries in which we do business and may be transferred between those countries to enable information to be used in accordance with this Privacy Policy.

The information we collect may be transferred to the following countries which do not have data protection laws equivalent to those in force in the European Economic Area: United States of America, Russia, Japan, China and India.

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.

You expressly consent to the transfers of personal information described in this section E.



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### F. Retention of personal data

In this Section F, we have set out our data retention policies and procedures to ensure compliance with our legal obligations to retain and delete personal information. Personal data that we process for any purpose or purposes will not be kept for longer than is necessary for that purpose or those purposes.

Without prejudice to Article F-2, we will usually delete personal data falling under the categories set out below on the date / time set out below:

personal data type will be deleted {ENTER DATE / TIME}; and {ENTER ADDITIONAL DATES / HOURS}.

Notwithstanding anything else in this Section F, we will retain documents (including electronic documents) containing personal data:

to the extent that it is required by law;

if we believe that the documents may be relevant to any ongoing or prospective legal proceedings; and 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).

### G. Personal Data Security

We will take reasonable technical and organizational precautions to prevent the loss, misuse or alteration of your personal data.

We will store all personal information you provide on our secure servers (password and firewall protected).

All electronic financial transactions made through our website will be protected by encryption technology.

The user acknowledges that the transmission of information over the Internet is potentially insecure and the security of the data transmitted in this way is not guaranteed.

You are responsible for maintaining the confidentiality of the password used to access our website; we will not ask you for your password (except when you log into our website).



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### H. Amendments

We may update this policy from time to time by posting a new version on our site. You should check this page from time to time to ensure you understand any changes to this policy. We may notify you of changes to this policy via email or the private messaging system on our website.

### I. Your Rights

The user may request access to his personal data that is stored. Providing such data is related to:

payment of the fee {ENTER FEE, IF APPLICABLE}; and

the provision of appropriate proof of identity ({CUSTOM TEXT TO REFLECT YOUR POLICY for this purpose, we will usually accept a photocopy of your passport certified by a notary public and an original copy of your utility bill with your current address}).

We may hide personal data at your request, to the extent permitted by law.

You can instruct us at any time not to process your personal data for marketing purposes.

In practice, you usually either expressly consent in advance to our use of your personal data for marketing purposes, or we will provide you with the option to opt-out of sharing your personal data for marketing purposes.



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### J. Third Party Websites

Our website contains hyperlinks to third party websites and detailed information about them. We have no control over and are not responsible for the privacy policies and practices of third parties.

### K. Information update

Please let us know if we need to correct or update the personal data we hold about you.

### L. Cookies

Our website uses cookies. A cookie is a file containing an identifier (a string of letters and numbers) that is sent by the web server to the web browser and stored by the browser. The identification data is re-sent to the server each time the browser sends a request to open a page on the server. Cookies can be "persistent" or "session" cookies: persistent cookies will be stored by your web browser and will remain valid until the expiration date you set, unless you delete them before the expiration date; the session cookie expires at the end of the user session when the web browser is closed. Cookies typically do not contain any information that identifies you, but the personal information we store about you may be linked to information stored in and obtained from cookies. {CHOOSE THE APPROPRIATE PHASE We only use session cookies / only persistent cookies / both session cookies and persistent cookies on our site.}

The names of the cookies we use on our website and the purposes for which they are used are set out below:

we use Google Analytics and Adwords on our website to recognize your computer when the user {INCLUDES ALL APPLICATIONS FOR WHICH COOKIES ARE USED ON YOUR SITE, visits the site / tracks users while browsing the site / allows you to use a shopping cart on the site / improve website usability / analyze the use of the website / administer the website / manage the website / prevent fraud and improve the security of the website / personalize the website for each user / target advertisements that may be of particular interest to specific users / describe goals};

Most browsers allow you to refuse to accept cookies - for example:

in Internet Explorer (version 10) you can block cookies using the cookie handling override settings available by clicking "Tools", "Internet Options", "Privacy" and then "Advanced"; in Firefox (version 24) you can block all cookies by clicking "Tools", "Options", "Privacy", selecting "Use custom settings for history" from the drop-down menu and unchecking "Accept cookies from sites";



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and in Chrome (version 29) you can block all cookies by opening the "Customize and control" menu, clicking "Settings", "Show advanced settings" and "Content settings", and then selecting "Block sites from setting any data" under the "Files cookie".

Blocking all cookies will have a negative impact on your ability to use multiple websites. If you block cookies, you will not be able to use all the features of our website.

You can delete cookies already stored on your computer - for example:

in Internet Explorer (version 10) you must manually delete cookies (instructions can be found at <http://support.microsoft.com/kb/278835>);

in Firefox (version 24) you can delete cookies by clicking "Tools", "Options" and "Privacy", then selecting "Use custom settings for history", clicking "Show cookies" and then clicking "Delete all files" cookie"; and

in Chrome (version 29) you can delete all cookies by opening the "Customize and control" menu, clicking "Settings", "Show advanced settings" and "Clear browser data", and then selecting "Delete cookies and other site data and Plugins" before clicking "Clear data browsing".

Deleting cookies will have a negative impact on the usability of many websites.

The Planet website accepts no liability and recommends consulting legal experts if you implement the above measures on your website.