**1. Introduction**

More than Equal Limited (“More than Equal”, “Us”, “We”, “Our”). We are committed to managing your personal information in accordance with current legislation and best practice. Our aim is to be responsible, relevant and secure when using your data. You can find out more about us by visiting [www.morethanequal.com](http://www.morethanequal.com).

Whenever you provide personal information we will treat that information in accordance with this Notice. We endeavour at all times to keep your data accurate and secure, and to honour your data preferences with regard to receipt of direct marketing e.g. postal communications, email, mobile messaging and telephone calls.

We respect your privacy and we are committed to protecting your personal Information as that term is defined in the General Data Protection Regulation (“GDPR) (“Information”). We comply with the principles of the GDPR and aim to maintain consistently high levels of best practice in our processing of your Information.

This Privacy Policy (“Policy”) is intended to inform you how we collect, use and disclose your personal data. This Policy is intended to assist you in making informed decisions about your Information when using our website or the services provided by us or our group companies.

Please read the Policy in conjunction with our Terms & Conditions and our Cookie Policy. For these documents, please refer to our website you came from.

By using our website and services you consent to our collection and use of your Information as described in this Policy. If we change our Policy and/or procedures, we will update this Policy to keep you aware of what Information we collect, how we use it and under what circumstances we may disclose it. Your continued use of the website or services after this Policy has been amended shall be deemed to be your continued acceptance of the terms and conditions of this Policy, as amended.

In addition to this Policy, each service offered by us or our group companies may have additional privacy provisions that are specific to the particular service. These supplemental disclosures are made adjacent to the particular service at the time your Information is collected.

**2. What information do we collect?**

All your Information will be held and used in accordance with the GDPR where applicable. If you want to know what Information we collect and hold about you, please email us at: [info@MorethanEqual.com](mailto:info@MorethanEqual.com), or write to us at the address given at the end of this Policy. When you visit and use our website or request our services you may provide us with or we may collect your Information such as your postal address, email address and other personal information. You may provide or we may collect this Information in a number of ways:

2.1. Information you voluntarily provide to us

We collect and maintain Information that you voluntarily submit to us during your use of our website or services. For example:

* If you sign up to receive a newsletter you may provide us with contact Information (e.g., email, telephone and/or or physical address)
* You may provide us with Information in the course of email, customer support interactions and surveys.

Different websites operated by us may ask for different pieces of Information. You can choose not to provide us with certain Information, but this may stop you from gaining access to a service or limit the features that you can use on our websites. For more Information, please see the “How We Use Your Information” section of the Policy below.

2.2. Information we collect through your use of our Website

As you use our website, Information may also be passively collected by us through our use of cookies, flash cookies, web beacons, pixels, log files, and other technologies. This Information allows us to deliver more helpful Information, services, tools and advertisements. Please see our Cookie Policy for more Information.

**3. How we protect children's privacy**

3.1. Our Sites are general audience Sites not directed at children under the age of 13. If we obtain actual knowledge that any information we collect has been provided by a child under the age of 13, we will promptly delete that information.

**4. Your Rights**

4.1 Right to Confirmation

Each data subject has the right to require the controller to confirm whether personal data relating to him or her is being processed. If an affected person wishes to make use of this confirmation right, they can contact us at [info@MorethanEqual.com](mailto:info@MorethanEqual.com), or write to us at the address given at the end of this Policy.

4.2 Right to Information

Any person concerned by the processing of personal data shall have the right at any time to obtain from the data controller information free of charge on the personal data stored about him and a copy of that information. Furthermore, the data subject has the right to be provided with with the following information:

* the processing purposes
* the categories of personal data being processed
* the recipients or categories of recipients to whom the personal data have been disclosed or are still being disclosed, in particular to recipients in third countries or to international organizations
* if possible, the planned duration for which the personal data are stored or, if that is not possible, the criteria for determining that duration
* the existence of a right to rectification or erasure of the personal data concerning him or of limitation of processing by the controller or a right to object to such processing
* the existence of a right of appeal to a supervisory authority
* if the personal data are not collected from the data subject: All available information about the origin of the data, the existence of automated decision-making including profiling and - at least in these cases - meaningful information on the logic involved and the scope and intended impact of such processing on the data subject

In addition, the data subject has a right of access as to whether personal data has been transmitted to a third country or to an international organization. If that is the case, then the data subject has the right to obtain information about the appropriate guarantees in connection with the transfer.

If an affected person wishes to exercise this right to information, they can contact us at [info@MorethanEqual.com](mailto:info@MorethanEqual.com), or write to us at the address given at the end of this Policy.

4.3. Right to Rectification

Any person affected by the processing of personal data has the right granted by the European legislator to demand the immediate correction of inaccurate personal data concerning him / her. Furthermore, the data subject has the right to request the completion of incomplete personal data, including by means of a supplementary declaration, taking into account the purposes of the processing.

If an affected person wishes to exercise this right of rectification, they can contact us at [info@MorethanEqual.com](mailto:info@MorethanEqual.com), or write to us at the address given at the end of this Policy.

4.4 Right to Cancellation

Any person affected by the processing of personal data shall have the right to require the controller to immediately delete the personal data concerning him, provided that one of the following reasons is satisfied and the processing is not required:

* The personal data has been collected for such purposes or otherwise processed for which they are no longer necessary.
* The data subject withdraws the consent on which the processing was based the data controller lacks any other legal basis for the processing.
* The data subject objects to the processing and there are no legitimate reasons for the processing, or the data subject appeals the processing.
* The personal data was processed unlawfully.
* The deletion of personal data is required to fulfill a legal obligation under Union or national law, to which the controller is subject.
* The personal data were collected in relation to information society services.

If one of the above reasons is correct and an affected person wishes to arrange for the deletion of personal data held by us, they may, at any time, contact us at [info@MorethanEqual.com](mailto:info@MorethanEqual.com), or write to us at the address given at the end of this Policy. Our data protection officer or another employee will arrange that the deletion request be fulfilled immediately.

If the personal data have been made public by us and if our company is responsible for deleting personal data as the person responsible, we shall take appropriate measures, including technical ones, taking into account the available technology and the implementation costs to inform other data controllers processing the published personal data that the data subject has requested that these other data controllers delete all links to such personal data or copies or replications of such personal data, as far as the processing is not required. Our data protection officer or another employee will arrange the necessary in individual cases.

4.5. Right to Restriction of Processing

Any person affected by the processing of personal data has the right to require the controller to restrict the processing if one of the following conditions applies:

* The accuracy of the personal data is contested by the data subject for a period of time that enables the person responsible to verify the accuracy of the personal data.
* Processing is unlawful, the data subject refuses to delete the personal data and instead requests the restriction of the use of personal data.
* The controller no longer needs the personal data for processing purposes, but the data subject needs them to assert, exercise or defend legal claims.
* The data subject has objected to the processing and it is not yet clear whether the legitimate reasons of the person responsible outweigh those of the data subject.

If one of the above conditions is met and an affected person wishes to request the restriction of personal data stored by us, they may at any time contact our data protection officer or another employee of the controller. Our data protection officer or another employee will cause the restriction of processing.

4.6. Data Transferability

Any person affected by the processing of personal data shall have the right to obtain the personal data concerning him or her provided to a controller by the data subject in a structured, common and machine-readable format.

The data subject has the right to obtain that the personal data are transmitted directly from one controller to another, insofar as this is technically feasible and if so this does not affect the rights and freedoms of others.

In order to assert the right of data transferability, the data subject may at any time turn to the data protection officer appointed by us.

4.7. Right to Object

Any person concerned by the processing of personal data shall have the right, for reasons arising from its particular situation, against the processing of personal data relating to it.

In the event of an objection, we will no longer process personal data unless we can demonstrate compelling legitimate grounds for processing that outweigh the interests, rights and freedoms of the data subject, or the processing is for the purpose of asserting, exercising or defending legal claims.

If we process personal data in order to operate direct mail, the data subject has the right to object at any time to the processing of personal data for the purposes of such advertising. This also applies to the profiling, as far as it is associated with such direct mail. If the data subject objects to processing for direct marketing purposes, we will no longer process the personal data for these purposes.

In addition, the data subject has the right, for reasons that arise from their particular situation, against the processing of personal data relating to them, which we carry out for scientific or historical research purposes or for statistical purposes, to object, unless such processing is necessary to fulfill a public interest task.

In order to exercise the right to object, the data subject can directly contact us at [info@MorethanEqual.com](mailto:info@MorethanEqual.com), or write to us at the address given at the end of this Policy. The data subject is also free, in the context of the use of information society services, to exercise his right of opposition by means of automated procedures using technical specifications.

4.8 Automated Decisions in Individual Cases Including Profiling

Any person concerned by the processing of personal data shall have the right not to be subject to a decision based solely on automated processing, including profiling, which has a legal effect on it or, in a similar manner, significantly affects it.

If the data subject wishes to enforce automated decision-making rights, they may contact our data protection officer or other data controller at any time.

4.9 Right to Revoke Consent

Any person affected by the processing of personal data has the right, granted by the European directive and regulatory authority, to revoke consent to the processing of personal data at any time.

If the data subject wishes to assert their right to withdraw consent, they may at any time contact contact us at [info@MorethanEqual.com](mailto:info@MorethanEqual.com), or write to us at the address given at the end of this Policy.

**5. How we use your information**

We will use your Information in the ways described below and as described at the time that the Information is collected.

5.1. To Provide the Services

In general, we use your Information as necessary or appropriate for our business purposes including to:

* Respond to inquiries or requests that you direct to us
* Send communications and administrative emails about the website or our services
* Deliver customer services
* Other purposes related to any of the above

5.2. Marketing

Where you have provided us with the appropriate consents, or where the GDPR entitles us to do so, we may send you marketing materials about other products or services offered by More Than Equal, including products or services offered by the affiliated companies.

However, be assured that we understand the irritations of unsolicited communications and we are fully committed to ensuring the rights and obligations set out in the GDPR and the Privacy and Electronic Communications Regulations 2003, updated 2004 and 2011 are respected.

**6. Can I find out what personal information More than Equal holds on me?**

Under GDPR you have the right to request a copy of the Information that we hold about you. It will require two pieces of identification to prove your identity. Please make a written application to the More than Equal Limited, 10 Upper Bank Street London, E14 5JJ. The statutory time for our response is 1 month but with your help in providing us with relevant Information we endeavour to respond sooner.

If any of the Information that we hold about you is incorrect and you’d like it amended, please email [info@MorethanEqual.com](mailto:info@MorethanEqual.com) and we’ll review your request.

**7. How we disclose your information to third parties**

We may share your Information with third parties as specifically approved by you or under the circumstances described below and in this Policy.

7.1. Disclosure for legal reasons

We may disclose your Information if we are under a duty to disclose or share your Information to comply with any legal obligation or in order to enforce or apply or fulfil our terms and conditions and other agreements or protect the rights, property, or safety of our customers, our group companies or others. This includes exchanging Information with other companies and organisations for fraud protection and credit risk reduction.

We use a number of third party organisations to help provide a professional service to our customers (i.e. fulfilment bureaus, call centres, and website designers). These organisations act as data processors and are strictly contractually controlled in how they may/may not use your Information and we remain responsible for the protection of your Information.

7.2. Changes to our Company

In the event we go through a business transition such as a merger, acquisition by another company, or sale of all or a portion of our assets, your Information may be among the assets transferred. You acknowledge that such transfers may occur and are permitted by this Policy.

**8. Updating and control of your information**

There are a number of ways in which you can control the collection, use, and sharing of your Information and update your Information and preferences.

8.1. Opting-Out on Receipt of Marketing Communications

When you receive electronic marketing communications from us you will have the opportunity to "opt-out" by following the unsubscribe instructions provided in e-mails covering any marketing communication from us.

8.2. Contacting Us

If your Information has changed or if you no longer wish to receive marketing communications from us then you can amend your Information or update your preferences if you [click here](mailto:info@morethanequal.com).

Please note that:

* Even if you delete Information, we may retain your Information in conformance with our data retention policy most specifically for legal and tax reasons and to honour your opt-out requests; and
* We do not keep Information longer than we deem necessary.
* We are not responsible for updating or removing your Information contained in the lists or databases of third parties who have previously been provided with Information as permitted by this Policy.

**9. Third party links and services**

Please remember that when you use a link to go from our website to another website or you request a service from a third party, our Policy no longer applies. Your browsing and interaction on any other website or your dealings with any other third party service provider, is subject to that website’s or third party service provider’s own rules and policies. We do not monitor, control, or endorse the Information collection or privacy practices of any third parties. We encourage you to become familiar with the privacy practices of every website you visit or third party service provider that you deal with and to contact them if you have any questions about their respective privacy policies and practices. This Policy applies solely to Information collected by us through our website or services and does not apply to these third party websites and third party service providers.

**10. Where we store your information**

The Information that we collect from you may be transferred to, stored and processed at a destination outside the European Economic Area, (all EU countries plus Norway, Iceland and Liechtenstein). Your Information may also be processed by staffs operating outside the EEA who work for us or for one of our suppliers, for instance, for customer service purposes. By submitting Information to us, you agree to this transfer, storing or processing. We will take all reasonable steps necessary, including the use of the Model Contractual Arrangements as approved by the EU, or other contractual means to ensure that your Information is treated securely and in accordance with this Policy and the GDPR. We do not store credit card details nor do we share customer details with any 3rd parties.

**11. Security of your information**

We follow appropriate security procedures in the storage and disclosure of your Information so as to prevent unauthorised access by third parties. We also require those parties to whom we transfer personal Information to comply with the same. However, unfortunately, the transmission of Information via the Internet is not completely secure. So, we cannot ensure the security of your Information transmitted by you to us via the internet. Any such transmission is at your own risk and you acknowledge and agree that we shall not be responsible for any unauthorised use, distribution, damage or destruction of your Information, except to the extent we are required to accept such responsibility by the GDPR. Once we have received your Information we will use security procedures and features to prevent unauthorised access to it.

**12. Reporting of security vulnerabilities**

More than Equal is committed to the privacy, safety and security of our customers. If you discover a potential security vulnerability, we would appreciate it if you could report it just to us in a responsible manner. Please email us at [info@MorethanEqual.com](mailto:info@MorethanEqual.com) and we will respond to you as soon as possible. This provides us with an opportunity to work with you and quickly address and resolve any issue. Publicly disclosing a potential vulnerability could put the wider community at risk, and therefore we encourage you to come to us first. We’ll keep you informed as we move forward with our investigations.

**14. Anti-spam policy and possibly unwanted messages**

More than Equal has zero tolerance concerning the sending of unsolicited/bulk commercial email (“spam”). Any recipient of email communication from us may request, at any time, to unsubscribe. In the unlikely event you are in receipt of unwanted email communication from More than Equal which could be considered as spam, we encourage you to report it to us by forwarding a copy to us at: [info@MorethanEqual.com](mailto:info@MorethanEqual.com)

We will fully investigate any reports of abuse.

**15. How to contact us**

If you have any questions regarding privacy or this Policy, you may contact us as follows:

More than Equal Limited, 10 Upper Bank Street London, E14 5JJ, E-mail us: [info@MorethanEqual.com](mailto:info@MorethanEqual.com)

**Changes to this Policy**

We may amend/update this policy by publishing a new version on this web site at any time, so we encourage you to check back regularly to make sure that you are still happy with the terms under which we process your personal data.

*13 December 2022*