

# Privacy & Cookies Policy

This version of our Privacy Policy was last updated December 21st 2020.

## **Your rights, your information and how we use it.**

We recognise that when you visit our website and provide us with personal information, you trust that we will act responsibly and keep your information secure and confidential.

This privacy notice sets out the basis on which any personal data we collect from you or that you provide to us when you use or interact with our website will be processed.

It is important that you read this notice, together with any other privacy notice or policy we may provide on specific occasions when we are collecting or processing personal information. *Our Privacy Policy contains important information about what personal details we collect; what we do with that information; who we may share it with and why; and your choices and rights when it comes to the personal information you have given us.*

Spring Academy is committed to safeguarding your personal information. Whenever you provide personal information to us, we are legally obliged to use it in accordance with all laws concerning the protection of personal information (we refer to these laws collectively in this privacy notice as the “data protection laws”).

We may need to make changes to our Privacy Policy; so please check our website for updates from time to time. If there are important changes such as changes to where your personal data will be processed; we will contact you to let you know.

## **What information will we collect about you?**

Personal data, or personal information, means any information about an individual from which that individual can be identified.

We may collect, store, and use the following categories of personal information about you:

- Identity and contact details such as your name, title, billing address, delivery address, email address and telephone number.
- Financial and transaction data, details about payments to and from you and other details of products you have purchased from us.
- Usage and technical data about how you use our website including data about your browsing actions and patterns.
- Marketing and communications data.

We collect this information when you submit a request form or purchase from our website. Without your permission, we will not disclose information about your visits to our website – or any other personal information that you may give us – to any third parties.

We do not collect any special categories of personal data about you (for example, details about your race or ethnicity, religious or philosophical beliefs, political opinions or information about your health).

### **How will we collect and use your personal information**

We use different methods to collect data from and about you including through:

- When you provide it to us e.g. by contacting us or purchasing from our website.
- Direct interactions. You may give us your personal information when corresponding with us by post, phone, email or otherwise.
- Online sales
- When you use our website, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also use analytics services providers such as Google.

### **How will we share and disclose your personal information?**

We may share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another lawful basis for doing so.

We may need to share your personal information with the following parties for the relevant purposes set out above:

\* Our service providers supplying IT, e-commerce and system administration services and other technical IT services including data analytics.

We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions. Where the third parties we use are data controllers in their own right (for example, the payment processors we use) then they will be required to comply with data protection laws.

### **Information we collect and our purposes for using your personal data**

We have set out below a description of ways in which we may use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Your personal data may be processed for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

### **When you visit our website**

- Web server log information

We use a third party server to host our website called top.host, the terms and conditions of which can be found here: <https://top.host/terms-and-conditions.htm> their privacy notice here: <https://top.host/privacy-notice> and their privacy policy here: <https://top.host/privacy-policy.htm>

**Lawful basis for processing:** Our legitimate interests of the General Data Protection Regulation

**Legitimate Interest(s):** We and our third party hosting provider have a legitimate interest to ensure network and information security when processing your information.

### **Making a purchase via our website**

- Your name
- Contact details (address, email, phone)
- Payment information

**Lawful basis for processing:** To comply with our legal obligation under (Article 6(1)(c) of the General Data Protection Regulation

**Lawful basis for processing:** Necessary to establish and perform a contract under (Article 6(1)(b) of the General Data Protection Regulation

**Reason why necessary:** Requirement of mandatory information collected at checkout to establish who the contract is with and to contact you to fulfil our obligations to supply under the contract.

### **Using the contact form via our website**

- Your name
- Contact details (address ,email, phone)
- Any other Information provided to us when you complete the contact form.

**Lawful basis for processing:** Our legitimate interests of the General Data Protection Regulation

**Legitimate Interest(s):** Responding to any requests or enquiries submitted by you and keeping records of correspondence

**Lawful basis for processing:** Necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

**Reason why necessary:** Where your message relates to us providing you with our services or taking steps such as providing you with information about such services at your request, we will process your information to enable us to do so

### **Contacting us by Phone**

- Phone number
- Any Information provided during your conversation with us.

**Lawful basis for processing:** Our legitimate interests of the General Data Protection Regulation

**Legitimate Interest(s):** Responding to any requests or enquiries submitted by you and keeping records of correspondence

**Lawful basis for processing:** Necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

**Reason why necessary:** Where your message relates to us providing you with our services or taking steps such as providing you with information about such services at your request, we will process your information to enable us to do so

### **Online Sales from our eshop**

- Phone number
- Address
- Type of payment
- Any Information provided during your conversation with us.

**Lawful basis for processing:** Our legitimate interests of the General Data Protection Regulation

**Legitimate Interest(s):** Responding to any requests or enquiries submitted by you and keeping records of correspondence and to be able to fulfill the payment and shipping of our products

**Lawful basis for processing:** Necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation)

**Reason why necessary:** Where your message relates to us providing you with our services or taking steps such as providing you with information about such services at your request, we will process your information to enable us to do so

### **Contacting us by Email displayed on our website**

- Email address
- Any other Information provided such as your name, telephone number and any information contained within any signature block in your email.

**Lawful basis for processing:** Necessary for our legitimate interests (to run our business) To take steps to enter into dialogue or contract with you (such as providing accommodation services)

**Legitimate Interest(s):** Responding to any requests or enquiries submitted by you and keeping records of correspondence

**Lawful basis for processing:** Necessary to perform a contract (such as providing accommodation services) or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

**Reason why necessary:** Where your message relates to us providing you with our services or taking steps such as providing you with information about such services at your request, we will process your information to enable us to do so

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- For administrative and business purposes in need to perform the contract we are about to enter into or have entered into with you; specifically to finalise and administer your purchase.
- where we have your consent;
- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; and/or
- where we are required to comply with a legal or regulatory obligation.

### **International Transfers**

Some of our external third parties, may be based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

### **Cookies**

Our website, uses cookies and other related technologies (for convenience all technologies are referred to as "cookies"). Cookies are also placed by third parties we have engaged. In the document below we inform you about the use of cookies on our website.

A cookie is a small simple file that is sent along with pages of this website and stored

by your browser on the hard drive of your computer or another device. The information stored therein may be returned to our servers or to the servers of the relevant third parties during a subsequent visit.

A script is a piece of programme code that is used to make our website function properly and interactively. This code is executed on our server or on your device.

A web beacon (or a pixel tag) is a small, invisible piece of text or image on a website that is used to monitor traffic on a website. In order to do this, various data about you is stored using web beacons.

### **Technical or functional cookies**

Some cookies ensure that certain parts of the website work properly and that your user preferences remain known. By placing functional cookies, we make it easier for you to visit our website. This way, you do not need to repeatedly enter the same information when visiting our website and, for example, the items remain in your shopping cart until you have paid. We may place these cookies without your consent.

### **Marketing/Tracking cookies**

Marketing/Tracking cookies are cookies or any other form of local storage, used to create user profiles to display advertising or to track the user on this website or across several websites for similar marketing purposes.

### **Social media buttons**

On our website we have included buttons for Facebook to promote webpages (e.g. “like”, “pin”) or share (e.g. “tweet”) on social networks like Facebook. These buttons work using pieces of code coming from Facebook themselves. This code places cookies. These social media buttons also can store and process certain information, so a personalized advertisement can be shown to you.

### **How long will we keep your personal information?**

#### **Retention periods**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

**Correspondence and enquiries:** We will retain your information whether contacted by email, contact form or by phone until we have responded to or resolved your enquiry and for 12 months after which point we will delete your information

**Server log information:** We retain information on our server logs for [12] months

In some circumstances you can ask us to delete your data: see section below for further information.

## **How we secure your personal information**

We have put appropriate technical and organisational security measures in place to protect your personal information from being, accessed, altered, disclosed, used in an unauthorised or unlawful way, accidentally lost or destroyed including:

- restricting the sharing and providing of access to your information to the minimum extent, considering all appropriate confidentiality restrictions.
- using secure servers to store your information
- prior to access being granted to your information attaining verification for the identity of any individual who requires access.

We have also put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## **Your data protection rights**

Under certain circumstances, subject to certain limitations on certain rights you have the following rights under Data Protection Legislation in relation to your personal data. These include the right to:

- request access to your personal information;
- request correction or deletion of your personal information;
- object to processing of your personal data;
- request restriction of processing your personal information;
- request transfer of your personal data; and
- withdraw your consent to use your information

To exercise any of the above rights please contact us using the details in our “contacting us” section below.

The Act gives you the right to access information held about you generally you will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of €10 to meet our costs in providing you with details of the information we hold about you.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **Data Protection Authority**

You have the right to make a complaint at any time to the Greek supervisory authority for data protection issues.

We would, however, appreciate the chance to deal with your concerns before you approach them so please do get in touch using the details in our “Contacting us” section below.

### **Changes to our privacy notice**

We reserve the right to update this privacy notice at any time, and where we make minor changes to our Privacy Policy we will provide you with a new privacy notice when we make any substantial updates. Where we make major changes to our Privacy Policy or intend to use your information for a new of different purpose than the purpose in which we originally collected it, we will notify you by email or by posting a notice on our website.

If you have any questions about this privacy notice, please let us know using the “Contacting us” details below.

### **Contacting us**

Our full details are:  
Apostolos Patounis  
9 Ioannou Theotoki str  
Corfu 49100 - Greece  
T: +30 26610 39806  
info@patounis.gr