

Privacy & Cookies Policy

Our website www.andco.life (the “Site”) and our mobile application (our “App”) (the Site and App together collectively referred to as the “&Co Platform”) is owned and operated by AND CO WORKS Limited (a company registered in England and Wales under number 10809914 with its registered office at 2nd Floor, Gosfield Street, Fitzrovia, London, United Kingdom, W1W 6HL) (“&Co”, “we”, “our”, and “us”).

We are committed to protecting and respecting your privacy. This policy (together with our Terms of Use) sets out the basis on which any personal information we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our practices regarding your personal information and how we will use it.

We are registered with the Information Commissioner’s Office under registration number ZA304816.

Contacting us:

If you have any questions about our Privacy Policy or your information, or to exercise any of your rights as described in this Privacy Policy or under data protection laws, you can contact us:

By post:

AND CO WORKS Limited, 2nd Floor, Gosfield Street, Fitzrovia, London, United Kingdom, W1W 6HL

By email:

support@andco.life

What information we collect

Information you give us

You may give us information about you by making a booking or filling in forms on the &Co Platform or by corresponding with us by phone, email or otherwise. This includes information you provide when you:

- register to use the &Co Platform;
- make a booking on the &Co Platform;
- sign up to receive our newsletter;
- enter a competition, promotion or survey; and
- participate in social media functions on the &Co Platform.

Information we collect from you

We may collect, store and use information about your visits to the &Co Platform and about your computer, tablet, mobile or other device through which you access the &Co Platform. This includes the following information:

- technical information, including the Internet protocol (IP) address, your login information, your browser type and settings, time zone setting, browser plug-in types and versions, operating system and platform, and geographical location; and
- information about your visits and use of the &Co Platform, including the full Uniform Resource Locators (URL), clickstream to, through and from our Site, pages you viewed and searched for, page response times, length of visits to certain pages, referral source/exit pages, page interaction information (such as scrolling, clicks and mouse-overs), and website navigation and search terms used.

We may also collect information about you from other sources, such as commercially available sources.

What we do with your information

We use your information:

- to carry out the services you request from us online on the &Co Platform;
- to provide you with information that you request from us; and
- to allow you to participate in interactive features of our service, when you choose to do so.

Where it is in our legitimate interest to do so, we use your information:

- to administer the &Co Platform including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve the &Co Platform to ensure that content is presented in the most effective manner for you and for your computer, mobile device or other item of hardware through which you access the &Co Platform;
- as part of our efforts to keep the &Co Platform safe and secure;
- to measure or understand the effectiveness of any advertising we serve to you and others, and to deliver relevant advertising to you; and
- from time to time, we may also use your information to contact you for market research purposes.

Where you have given us consent, we shall provide you with information about any new products, services, events, promotions, special offers and other information which we think will be of interest to you. You can withdraw your consent at any time, but without affecting the lawfulness of processing based on consent before its withdrawal. You can update your details or change your privacy preferences at any time by contacting us as given in “Contacting us” above.

Disclosure of your information to third parties

We may share your personal information with our business partners, suppliers and sub-contractors to enable us to carry out any contract we enter into with you.

We may also disclose your personal information to third parties where it is in our legitimate interest to do so including for the following reasons:

- in the event that we sell or buy any business or assets, in which case we may disclose your personal information to the prospective seller or buyer of such business or assets;
- if all or substantially all of &Co's assets are acquired by a third party, in which case personal information held by it about its customers will be one of the transferred assets;
- if we are under a duty to disclose or share your personal information in order to comply with any legal obligation; or
- to enforce or apply our Terms of Use or to establish, exercise or defend the rights of &Co, our customers or others.

Save as set out in this Privacy Policy, we do not sell your personal information or disclose it to any third parties without your consent.

Security of your information

We are committed to ensuring that your information is safe and take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

All information you provide to us is stored on our secure servers within the United Kingdom. Any payment transactions will be encrypted. Where we have given you (or where you have chosen) a password which enables you to access certain parts of the &Co Platform, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your data transmitted to the &Co Platform; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

How long we keep your information

We will keep your data for as long as necessary to fulfil the purposes described in this Privacy Policy or for as long as we are required by law.

Your rights

Access to your information and updating your information

You have the right to access information which we hold about you. If you so request, we shall provide you with a copy of your personal information which we are processing. For any further copies which you may request, we may charge a reasonable fee based on administrative costs.

You also have the right to receive your personal information in a structured and commonly used format so that it can be transferred to another data controller (“data portability”).

We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate.

Right to object

Direct marketing

You have the right to object at any time to our processing of your personal information for direct marketing purposes.

Where we process your information based on our legitimate interests

You also have the right to object, on grounds relating to your particular situation, at any time to processing of your personal information which is based on our legitimate interests. Where you object on this ground, we shall no longer process your personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

Your other rights

You also have the following rights under data protection laws to request that we rectify your personal information which is inaccurate or incomplete.

In certain circumstances, you have the right to:

- request the erasure of your personal information erasure (“right to be forgotten”);
- restrict the processing of your personal information to processing to which you have given your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of others.

Exercising your rights

You can exercise any of your rights as described in this Privacy Policy and under data protection laws by contacting us as given in “Contacting us” above.

Save as described in this Privacy Policy or provided under data protection laws, there is no charge for the exercise of your legal rights. However, if your requests are manifestly

unfounded or excessive, in particular because of their repetitive character, we may either: (a) charge a reasonable fee taking into account the administrative costs of providing the information or taking the action requested; or (b) refuse to act on the request.

Where we have reasonable doubts concerning the identity of the person making the request, we may request additional information necessary to confirm your identity.

Cookies

In order to improve the &Co Platform, we may use small files commonly known as “cookies”. A cookie is a small amount of data which often includes a unique identifier that is sent to your computer or mobile phone (your “device”) from the &Co Platform and is stored on your device’s browser or hard drive. The cookies we use on the &Co Platform won't collect personally identifiable information about you and we won't disclose information stored in cookies that we place on your device to third parties.

By continuing to browse the site, you are agreeing to our use of cookies.

If you don't want us to use cookies when you use the &Co Platform, you can set your internet browser not to accept cookies. However, if you block cookies some of the features on the &Co Platform may not function as a result.

You can find more information about how to do manage cookies for all the commonly used internet browsers by visiting www.allaboutcookies.org. This website will also explain how you can delete cookies which are already stored on your device.

We currently set the following cookies:

- **AndCo** - These cookies are necessary to allow us to operate the AndCo Service as you have requested. For example, they let us recognise what type of subscriber you are and then provide you with services accordingly.
- **Google Analytics** - We use these cookies to analyse how the AndCo Service is accessed, is used, or is performing. We use this information to maintain, operate, and continually improve the AndCo Service. We may also obtain information from our email newsletters, including whether you opened or forwarded a newsletter or clicked on any of its content. This information tells us about our newsletters' effectiveness and helps us ensure that we're delivering information that you find interesting.
- **Facebook** - We use these cookies to serve you with advertisements that may be relevant to you and your interests. The information may also be used for frequency capping purposes (e.g., to ensure we do not display the same advertisement to you repeatedly) and to help us regulate the advertisements you receive and measure their effectiveness.
- **Stripe** - We use these cookies to securely process payment data and prevent fraud.

Links

The &Co Platform may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates.

If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal information to these websites.

Complaints

You also have the right to complain to the Information Commissioner's Office (<https://ico.org.uk/>) about our data processing activities (helpline on 0303 123 1113).

Changes to our Privacy Policy

Any changes we may make to this Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our Privacy Policy.

This Privacy Policy was last updated on 22 January 2018.