

## Privacy Policy

**Policy Created: 24th June 2020**

**Policy Updated: 29th Marco 2021**

### Privacy Policy for saving.direct

Modern information and communication technologies play a fundamental role in the activities of an organization like Join The Triboo Ltd. We are a web services provider based in the United Kingdom.

Our principal activities are:

- web publicity display, e-mail marketing and mobile marketing services to promote a wide range of products and services.
- client recruitment campaigns through the internet and affiliate marketing.

We carry out such marketing activities for third parties (who may operate in any business sector) and are referred to in this **Privacy Policy** as Our Business Partners and Clients.

This privacy policy describes how Join The Triboo Ltd. will use the information that you provide to it (whether by completing the registration form or using its website, **saving.direct**

#### Join The Triboo Ltd company information

The Company complies with the UK Data Protection Act 1998, General Data Protection Regulation 2018 (GDPR) and the (EC Directive) Regulations 2003 which govern how it must handle personal information (Privacy Act).

Company Name: Join The Triboo Ltd

If you have an enquiry or concern about our privacy policy, you can contact our

#### **DPO**

Name: Marco Vincenzo Sicuro

Contact: marco.sicuro@triboo.com

Company Name: Join The Triboo Ltd

Registration Number: 07152223

ICO Number: Z222511X

VAT: GB102437752

Address: 26 - 28 Hammersmith Grove, London  
City, Postcode: London, W6 7BA

State: London

Country: England

Data Controller: Join The Triboo Ltd

### **Providing Visitors with Anonymous Access**

You can access our Website home page and browse our site without disclosing any personal data.

### **The services and links of our Web site**

Our Web site enables you to communicate with other visitors or to post information to be accessed by others. When you do so, other visitors may collect and process your data.

As a convenience to users, our Web site includes links to other websites or material which may be outside our control. We are not responsible for any information collected by third party web sites and/or for any content on any site outside our Website.

### **Automatic Collection of Information**

We automatically collect and process personal data by means such as programming and we link information automatically collected and processed by such means with personal data about specific individuals. We do so for the following purposes:

- Technical administration of the Web site
- Research and development
- Customer administration
- Marketing
- Trading in personal data

We use cookies to store personal data or we link information stored in cookies with personal data about specific individuals. We do so for the following purposes:

- Technical administration of the Web site
- Research and development
- Customer administration

- Marketing
- Trading in personal data

## **Data Collection and Purpose Specification**

We collect the personal data that you may volunteer while using our services.

We do not collect information about our visitors from other sources, such as public records or bodies, or private organisations.

To access the table of personal data types collected and purposes for which they are used, go to the end of the page. Please note that any purposes listed in the table below are referred to in this Privacy Policy as Commercial Purposes.

We do not collect or use personal data for any purpose other than those referred to in the table below. If we wish to use your personal data for a new purpose, we will give you the opportunity to consent to this new purpose: by indicating in a box at the point on the site where personal data is collected.

Your data may be transferred outside of the European Economic Area (the "EEA"). Any transfers of your data outside of the EEA will be made in accordance with the The General Data Protection Regulation. You can obtain more details of the protection given to your personal data when it is transferred outside the EEA by contacting us via the contact details mentioned above.

## **Your personal information**

When you register with us we ask for personal information such as your name, date of birth, contact details, and other details listed in the table below. We use this information for directing advertising campaigns, but never to process, or aid the process of, enquiry courses. Your gender and date of birth information will always remain confidential to any recruiters or employment companies that we work with.

When you are registering with us it is not until you click the Sign Up or "Register" button that your information is transferred.

Once you register with us and agree to the terms and conditions of this Privacy Policy that govern how your information will be processed, you will not be anonymous to us and our partners and clients and will become one of our users.

Additionally, if you input your information on a co-branded registration page, eg one of our partners or clients registration page, then the information that you give becomes the joint property of us, our partners and clients. We are not responsible for the information that our partners and clients receive.

The website and any services offered through the site are reserved for adults of the age of 18+. The

Data Controller will not knowingly collect or store data from anyone under the age of 18. Should this not be the case, the users can request the Data Controller to immediately delete all personal data inadvertently collected and relating to subjects under the age of 18.

### **How to access, correct or delete your Personal Information**

If you want to obtain access to any personal information that We hold about you, or believe any of your personal information that We hold is inaccurate, incomplete or it is not necessary to hold it or if you want to delete your personal information from Our database, you can contact Us on one of the channels below. Specifically, you have the following rights:

#### **Right to Rectification**

If at any point you believe the information We process on you is incorrect, you may at any time amend or update your data by contacting our Data Protection Officer.

#### **Right to Erasure**

Please send your request for erasure to our Data Protection Officer by email. If you request for your data to be erased, then we will confirm whether this can take place and the next steps that we will take. If we cannot erase your data, we will explain why and confirm any actions required to allow us to do so.

#### **Right to Restrict Processing**

If you make a restriction request, we will still store a copy of your data but cannot use this. We will inform you if the restriction needs to be lifted. You can make this request by email to our Data Protection Officer. If you request for your data to be restricted, we will confirm whether this can take place and the next steps that we will take. If we cannot restrict your data, we will explain why and confirm any actions required to allow us to do so.

#### **Right to Object to Processing**

You can object to the processing of your data at any time. This right will only apply if we are using your data in relation to a legitimate interest. If you object, we will no longer process your data unless we have a compelling and legitimate reason not to do so (e.g. a legal obligation). In this case, you will be informed why we cannot stop processing your data.

We will use reasonable efforts to resolve your request within 30 days. We are required to provide Our reasons if We refuse your request and, if you disagree, you are entitled to ask Us to make a note of the request with your information. We may charge a reasonable fee to cover Our costs of responding to your information requests.

## **RIGHT TO COMPLAIN**

The Data Protection Act 2018 gives you the right to complain to the data protection supervisory authority where you live, where you work or where the infringement took place. In the UK, this is the ICO, and their contact details are below:

Website: <https://ico.org.uk/global/contact-us/>

Telephone: 0303 123 1113

## **Disclosure of personal information**

With your consent, we may share, rent and sell your personal data or sell or rent our entire database to our partners and clients in any sector for any Commercial Purpose including marketing activities. By marketing activities, we mean the communication directly to particular individuals by e-mail, post, telephone or sms of any advertising or marketing material in respect of any product or service from us, our partners or clients.

If you subsequently decide you no longer wish to receive direct marketing/information from us, or no longer wish us to pass your information to third parties you should notify us accordingly by e-mail to: [privacyuk@triboo.com](mailto:privacyuk@triboo.com)

By registering with us you permit us or our partners or clients to use such information that you provide to alert you to a range of promotions and competitions in respect of any products or services. We may contact you regarding site changes or changes to such products or services that you use.

When you register with us you consent to us sending personally identifiable information about you to our partners or our clients and in particular we may:

- share, rent or sell such information for marketing purposes;
- share your information with third parties as required to provide the service or the product you have requested;
- send the information to our partners or clients who work with us for marketing purposes;
- respond to subpoenas, court orders or legal process;

## **Keeping our record accurate and up to date**

We regularly review the personal data held by us to ensure that it is up to date, accurate and not held for longer than necessary for our internal processes or as otherwise required by law. Your co-operation in helping us to keep your data accurate by informing us of any change of name or change of address is an important part of this. If you would like to review or change the details you have supplied us with, you may do so at any time.

## **Transferring your personal information outside the European Economic Area**

We may transfer personal information for any Commercial Purpose to countries outside of the European Economic Area. As these countries may not have similar data protection laws and the EU General Data Protection Regulation (GDPR) 2016/79, in such case we will take steps to ensure that your privacy rights continue to be protected.

### **Children's Privacy**

We do not knowingly collect personal data from children.

To ensure that children's privacy is respected on our Web site, we:

make reasonable efforts to verify that users are not children.

### **Confidentiality / Security**

We give you the option of using a secure transmission method to send us the following types of personal data:

- primary personal data (such as name and contact details)
- other personal and profiling data (such as physical description, leisure activities)
- identifiers (such as Web site password)

We have implemented security policies, rules and technical measures to protect the personal data that we have under our control from:

- unauthorised access
- improper use or disclosure
- unauthorised modification
- unlawful destruction or accidental loss

All our employees and data processors, who have access to, and are associated with the processing of personal data, are obliged to respect the confidentiality of our users and our visitors' personal data.

We ensure that your personal data will not be disclosed to State institutions and authorities except where required by law or other regulation.

When we temporarily provide personal information to companies that perform services for us, such as

to send you email or samples, we require those companies to protect the information in the same manner as Join The Triboo Ltd. These service companies are not permitted to use your personal information for any other purpose than the reason you provided it to Join The Triboo Ltd.

### **Your acceptance of these terms**

By using this site, you consent to the collection and use of this information by us and to our privacy policy. If we change our privacy policy in any way, we will post these changes on this page.

This policy does not apply to companies that we do not own or control, or to third parties other than our partners or our clients with whom we do not have any contractual relationship.

### **Access to the personal data we may hold about you**

If you have any questions, concerns or comments regarding us or our privacy policy or whether we are keeping personal data about you, please contact us:

- Email: [privacyuk@triboo.com](mailto:privacyuk@triboo.com)

We will provide you with a readable copy of the personal data which we keep about you, within a month. - although we may before require proof of your identity - We will provide the information without any charge.

We allow you to challenge the data that we hold about you and, where appropriate, you may have the data:

- erased
- rectified or amended
- completed

### **Privacy Support**

If you have an enquiry or concern about our privacy policy, please contact:

Company Name: Join The Triboo Ltd

Registration Number: 07152223

VAT: GB102437752

Address: 26-28 Hammersmith Grove, London

City, Postcode: London, W6 7BA

State: London

Country: England

Data Controller: Join The Triboo Ltd

Email address : [privacyuk@triboo.com](mailto:privacyuk@triboo.com)

URL : <https://triboo.com/>

We do not recommend another means by which visitors' concerns may be addressed.

**TABLE of personal data collected and purposes for which they are used**

Primary personal data/Business information

x volunteered by each visitor



Primary personal data	Technical administration of the Web site	Research & development	Customer Administration	Marketing	Trading in personal data
Name	X	X	X	X	X
Gender	X	X	X	X	X
Address	X	X	X	X	X
E-mail address	X	X	X	X	X
Phone/Fax number	X	X	X	X	X
CV	X	X	X	X	X
Business Information	Technical administration of the Web site	Research & development	Customer Administration	Marketing	Trading in personal data
Employer/organisation	X	X	X	X	X
Job title	X	X	X	X	X
Address	X	X	X	X	X
E-mail address	X	X	X	X	X
Phone/Fax number	X	X	X	X	X
other	-	-	-	-	-

#### Other personal details and profiling data

x volunteered by each visitor

#### Safeguards in place to ensure Personal Data

Join The Triboo will process users' personal data using manual and Informatic tools to ensure the security and confidentiality of the data.

The personal data of the Users of the Site will be kept for the time strictly necessary to carry out the primary purposes illustrated in the privacy policy or in any case for the protection in civil law of the interests of both Users and the Owner.

All data is stored on a secure server protected by WAF (Web Application Firewall) whose access is

protected by user name and password. All logs are also registered.

### **Data Sharing**

Following explicit consent in the registration form Triboo may share your email address and courses online related preferences with vendors that they use to send them email courses alerts.

Furthermore, a user can easily unsubscribe from them.

### **Data Retention**

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.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes. In some circumstances you can ask us to delete your data.

All users are automatically unsubscribed from partner direct mail marketing 24 months after signup. All users have the opportunity to change their marketing preferences at any time by logging in to their Account Details on the website.

24 months after registering all inactive users are removed from our member base and placed in the suppression table. An inactive member is classed as anyone who has not opened or clicked an email for a period of 6 months.

### **You may be contacted by e-mail within the following categories**

#### **Various contests:**

Offers for surveys, sweepstakes, prize draws and free giveaways

#### **Financial:**

Offers for professional associations; consumer, automobile and housing loans; household, automobile, travel and accident insurance; Claims (PPI/PBA). Our preferred partners in the claims sector are HQ Consultancy Ltd, Ascend Finance and Neilson Financial (Smart Insurance & British Seniors Insurance)

### **Credit Report**

### **Pharmaceutical**

### **Magazines and newspapers:**

Offers for newspapers and magazines on fashion, nature, photography, interior decorating, science, economics, fitness and lifestyle

### **Beauty and health tips:**

Offers for weight-loss products, dietary supplements, vitamins, creams and dental hygiene products

### **Clubs, organisations and web sites/portals:**

Charitable organisations, film clubs, dating sites and fitness centres

### **Electronics:**

Offers for TV providers, internet, mobile telephone service and web pages

### **Clothing, fashion and lifestyle:**

Offers for underwear, designer clothing, jewellery and makeup

### **Games and gambling:**

Offers to register on web sites featuring bingo, gambling and scratch games, for example

### **Transport, autos, travel and holidays:**

Offers for petrol, roadside assistance, airline tickets, motoring holidays, skiing holidays, charter trips and summer house rentals.

	Technical administration of the Web site	Research & development	Customer Administration	Marketing	Trading in personal data
Personal details	X	X	X	X	X
Physical description	-	-	-	-	-
Family characteristics	-	-	-	-	-
Education and skills	X	X	X	X	X
Life style or personal tastes	X	X	X	X	X
other	-	-	-	-	-

### Opting Out (Deregistration):

Should you wish to opt out of your data being used for these purposes, please [unsubscribe](#).

The consequences of deregistration are that your account details will be placed in a suppression file and you will not receive any further communications from saving.direct . Every email that saving.direct sends contains a link to unsubscribe.

### Opting out at a later date

Once you have given your consent, you can however still control whether or not you continue to receive communications or see such advertisements from such third parties. The method of control depends on the channel of communication or advertising

Use of your personal information

We use your personal information collected via the saving.direct website to:

Provide you with information about the products and services we offer  
Provide you with a more personalised service

Conduct market research

Pass on to selected companies to provide you with other offers and promotions

Help other companies profile and extend their databases

Facilitate communication between yourself and others

For analysis purposes or to build data products. In these instances, the information is aggregated and

wherever possible anonymised in line with the Information Commissioner's code of practice. Again, these products are of a marketing nature.

### **Security and storage of your personal information**

Join The Triboo Ltd is committed to protecting the security of your personal information. We use a variety of security technologies and procedures to help protect your personal information from unauthorized access, use, or disclosure. For example, we store the personal information you provide on computer systems with limited access, which are located in controlled facilities.

The Internet is not a 100% secure medium for communication and, accordingly, Join The Triboo Ltd cannot guarantee the security of any information you send to Saving Direct website via the Internet. Join The Triboo Ltd has all reasonable precautions possible in place to ensure data is kept and processed fairly. Join The Triboo Ltd is not responsible for any loss or damage you or others may suffer as a result of the loss of confidentiality of such information.

### **Managing your personal information**

Under the law and the EU General Data Protection Regulation (GDPR) 2016/79., you are entitled to see the information held about you and you may ask us to make any necessary changes to ensure that it is accurate and kept up to date. If you wish to do this, please contact us via the Contact Page or email [privacyuk@triboo.com](mailto:privacyuk@triboo.com)

### **Our Business Partners & Clients:**

- [Candlefox and their client portfolio - privacy policy](#)