

PRIVACY POLICY

BACKGROUND:

This Policy applies between you, the User of this, and any website you visit that is owned and operated by Phoenix Lead Flow AI. This Policy applies to us using any Data collected about your use of the Web Site and any Services or Systems therein. These sites include but are not limited to: , and consist of any subdomains or folders of the same.

Phoenix Lead Flow AI contact details:

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1. Definitions and Interpretation

In this Policy, the following terms shall have the following meanings:

"Account" means collectively the personal information, Payment Information, and credentials used by Users to access Material and/or any communications System on the Website;

"Content" means any text, graphics, images, audio, video, software, data compilations, and any other form of information capable of being stored in a computer that appears on or forms part of this Website;

"Cookie" means a small text file placed on your computer by when you visit certain parts of our Web Sites. This allows us to identify recurring visitors and to analyse their browsing habits within the Web Site. Where e-commerce facilities are provided, Cookies may be used to store your information. Further details are contained in Clause 10 and Schedule 1 of this Policy;

"Data" means collectively all information that you submit to the Web Site. This includes, but is not limited to, Account details and information submitted using any of our Services or Systems;

"" means and the parent company of Phoenix Lead Flow AI

"Service" means collectively any online facilities, tools, services or information that makes available through the Web Site either now or in the future;

"System" means any online communications infrastructure that makes available through the Web Site either now or in the future. This includes, but is not limited to, web-based email, message boards, live chat facilities and email links;

"User" / "Users" means any third party that accesses the Web Site and is not employed by and acting in the course of their employment;

and "Web Site" means the website that you are currently using and any sub-domains of this site and all sites owned by unless expressly excluded by their own individual terms and conditions.

2. Data Collected

Without limitation, any of the following Data may be collected:

2.1 name;

- 2.2 date of birth;
- 2.3 gender;
- 2.4 job title;
- 2.5 profession;
- 2.6 contact information such as email addresses and telephone numbers;
- 2.7 demographic information such as post code, preferences and interests;
- 2.8 financial information such as credit / debit card numbers;
- 2.9 IP address (automatically collected);
- 2.10 web browser type and version (automatically collected);
- 2.11 operating system (automatically collected);
- 2.12 a list of URLs starting with a referring site, your activity on this Web Site, and the site you exit to (automatically collected);
- 2.13 Cookie information (see clause 10 below).

3. Our Use of Data

3.1 Any personal Data you submit will be retained by for as long as you use the Services and Systems provided on the Web Site. Data that you may submit through any communications System that we may provide may be retained for a longer period of up to 6 years.

3.2 Unless we are obliged or permitted by law to do so, and subject to Clause 4, your Data will not be disclosed to third parties. This does not include our affiliates and / or other companies within our group.

3.3 All personal Data is stored securely in accordance with the principles of the Data Protection Act 1998. For more details on security, see clause 9 below.

3.4 Any or all of the above Data may be required by us from time to time in order to provide you with the best possible service and experience when using our Web Site. Specifically, Data may be used by us for the following reasons:

3.4.1 internal record keeping;

3.4.2 improvement of our products / services;

3.4.3 transmission by email of promotional materials that may be of interest to you;

3.4.4 contact for market research purposes which may be done using email, telephone, fax or mail. Such information may be used to customize or update the Web Site.

3.5 You will receive ongoing email communication from us. This can include product updates, informational emails and marketing emails of our products and 3rd party products and recommendations. These emails (considered data processing) are sent in the legitimate

interests mainly for supporting the growth of the company. Any products spoken of or promoted in the emails received may result in commissions to the company or individual promoting them. you can opt out of these emails at any time. ·

3.6 We may use the data collected to deliver relevant website content and advertisements to you (including Facebook adverts or other display advertisements) and to measure or understand the effectiveness of the advertising we serve you. Our lawful ground for this processing is legitimate interests which is to grow our business. We may also use such data to send other marketing communications to you. Our lawful ground for this processing is either consent or legitimate interests (namely to grow our business)

3.7 Sensitive Data We do not collect any Sensitive Data about you. Sensitive data refers to data that includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. We do not collect any information about criminal convictions and offenses..

3a. Your rights to the data collected and our policy on data requests

Upon written request to our support desk, currently operated from the email We shall provide any data held within 48 business hours of the request.

3b. Your right to be forgotten. Upon receipt of written request through our channel at and the request to delete all data held, any data stored within our system will be permanently erased within 48 business hours of the request.

3c. Your data once it leaves our control.

In some circumstances, data collected by the sites owned by Phoenix Lead Flow AI may integrate with third party services such as auto responder platforms and payment systems. In the case where your data is sent to these third party platforms, CometSuite and its employees or contractors are no longer responsible for that data.

3d. Your access to the site and provision of data consents that you are over 18 years of age

3e. We may process your personal data without your knowledge or consent where this is required or permitted by law

3f. We may collect data about you by you providing the data directly to us (for example by filling in forms on our site or by sending us emails). We may automatically collect certain data from you as you use our website by using cookies and similar technologies. We may receive data from third parties such as analytics providers such as Google based outside the EU, advertising networks such as Facebook based outside the EU, such as search information providers such as Google based outside the EU, providers of technical, payment and delivery services, such as data brokers or aggregators. We may also receive data from publicly available sources such as Companies House and the Electoral Register based inside the EU

Additional Data Information forming part of this section.

MARKETING COMMUNICATIONS

Our lawful ground of processing your personal data to send you marketing communications is either your consent or our legitimate interests (namely to grow our business).

Under the Privacy and Electronic Communications Regulations, we may send you marketing communications from us if (i) you made a purchase or asked for information from us about our goods or services or (ii) you agreed to receive marketing communications and in each case you have not opted out of receiving such communications since.

Under these regulations, if you are a limited company, we may send you marketing emails without your consent. However you can still opt out of receiving marketing emails from us at any time.

Before we share your personal data with any third party for their own marketing purposes we will get your express consent.

You can ask us to stop sending you marketing messages at any time by requesting us to delete your information OR by following the opt-out links on any marketing message sent to you OR by lodging a support request at any time.

If you opt out of receiving marketing communications this opt-out does not apply to personal data provided as a result of other transactions, such as purchases, warranty registrations etc.

DISCLOSURES OF YOUR PERSONAL DATA We may have to share your personal data with the parties set out below:

- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers
- Government bodies that require us to report processing activities.
- Third parties to whom we sell, transfer, or merge parts of our business or our assets

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

INTERNATIONAL TRANSFERS We are subject to the provisions of the General Data Protection Regulations that protect your personal data. Where we transfer your data to third parties outside of the EEA, we will ensure that certain safeguards are in place to ensure a similar degree of security for your personal data. As such:

- We may transfer your personal data to countries that the European Commission have approved as providing an adequate level of protection for personal data by; or
- If we use US-based providers that are part of EU-US Privacy Shield, we may transfer data to them, as they have equivalent safeguards in place; or
- Where we use certain service providers who are established outside of the EEA, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give personal data the same protection it has in Europe. If none of the above safeguards is available, we may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

DATA SECURITY We have put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorization. We also allow access to your personal data only to those employees and partners who have a business need to know such data. They will only process your personal data on our instructions and they must keep it confidential. We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach if we are legally required to. .

4. Third Party Web Sites and Services

Phoenix Lead Flow AI may, from time to time, employ the services of other parties for dealing with matters that may include, but are not limited to, payment handling, delivery of purchased items, search engine facilities, advertising and marketing. The providers of such services may have access to certain personal Data provided by Users of this Web Site. Any Data used by such parties is used only to the extent required by them to perform the services that Phoenix Lead Flow AI requests. Any use for other purposes is strictly prohibited. Furthermore, any Data that is processed by third parties must be processed within the terms of this Policy and in accordance with the Data Protection Act 1998

THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit .

5. Changes of Business Ownership and Control

5.1 Phoenix Lead Flow AI may, from time to time, expand or reduce its business and this may involve the sale of certain divisions or the transfer of control of certain divisions to other parties. Data provided by Users will, where it is relevant to any division so transferred, be transferred along with that division and the new owner or newly controlling party will, under the terms of this Policy, be permitted to use the Data for the purposes for which it was supplied by you.

5.2 In the event that any Data submitted by Users will be transferred in such a manner, you will not be contacted in advance and informed of the changes.

6. Controlling Access to your Data

6.1 Wherever you are required to submit Data, you will be given options to restrict our use of that Data. This may include the following:

6.1.1 use of Data for direct marketing purposes; and

6.1.2 sharing Data with third parties.

7. Your Right to Withhold Information

7.1 You may access certain areas of the Web Site without providing any Data at all. However, to use all Services and Systems available on the Web Site you may be required to submit Account information or other Data.

7.2 You may restrict your internet browser's use of Cookies. For more information see clause 10.4 below.

8. Accessing your own Data

8.1 You may access your Account at any time to view or amend the Data. You may need to modify or update your Data if your circumstances change. Additional Data as to your marketing preferences may also be stored and you may change this at any time.

8.2 You have the right to ask for a copy of your personal Data on payment of a administration fee if required.

9. Security

9.1 Data security is of great importance to Phoenix Lead Flow AI and to protect your Data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure Data collected online.

10. Cookies

10.1 Phoenix Lead Flow AI may set and access Cookies on your computer. Cookies that may be placed on your computer are detailed in Schedule 1 to this Policy.

10.2 A Cookie is a small file that resides on your computer's hard drive and often contains an anonymous unique identifier and is accessible only by the web site that placed it there, not any other sites.

10.3 You may delete Cookies, however you may lose any information that enables you to access the Web Site more quickly.

10.4 You can choose to enable or disable Cookies in your web browser. By default, your browser will accept Cookies, however this can be altered. For further details please consult the help menu in your browser. Disabling Cookies may prevent you from using the full range of Services available on the Web Site.

11. Changes to this Policy

Phoenix Lead Flow AI reserves the right to change this Privacy Policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Web Site and you are deemed to have accepted the terms of the Policy on your first use of the Web Site following the alterations.

12. Our assigned Data protection representative.

Email:

If contact regarding your data is required, please contact Jennifer via email at

Further information is available upon written request, submitted via our support portal

Contact Us If you have any questions about these Terms, please contact us via our support desk listed below.

Support Desk: for use of our software, it assumed you have also read the terms of service document, found here : <https://Phoenix Lead Flow AI.app/privacy>.