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Website Privacy Policy
March 2025

# **Legal Notices**

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# **Document Control**

Version	Editor	Date	Comments
1.0	Matt Doll	2025-03-09	First edition

#### 1. Introduction

1.1. Welcome to Sibylline Group ("we," "our," or "us"). We are committed to protecting your privacy and ensuring the security of your personal information. This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you visit our website [https://www.sibylline.group/] (the "Site") or use our services.

1.2. Please read this Privacy Policy carefully. By accessing or using our Site or services, you acknowledge that you have read, understood, and agree to be bound by all the terms of this Privacy Policy. If you do not agree with our policies and practices, please do not use our Site or services.

#### 2. Information We Collect

- 2.1. Information that identifies you as an individual. We may collect the following types of Personal Information:
  - 2.1.1.1. **Contact Information**: Name, email address, mailing address, phone number
  - 2.1.1.2. **Account Information**: Username, password, account preferences
  - 2.1.1.3. **Payment Information**: Credit card numbers, billing addresses, and other payment details (processed securely through our payment processors)
  - 2.1.1.4. **Identity Information**: Date of birth, government-issued identification (when required for specific services)
  - 2.1.1.5. **Communication Information**: Correspondence with us, feedback, responses to surveys
- **2.2.** We may automatically collect certain information about your equipment, browsing actions, and patterns, including:
  - 2.2.1. **Log Data**: IP address, browser type, operating system, referring URLs, date/time stamps, clickstream data
  - 2.2.2. **Device Information**: Device type, unique device identifiers, mobile network information
  - 2.2.3. **Location Data**: General location information based on IP address or more precise location if permitted by you
  - 2.2.4. **Usage Patterns**: Pages visited, time spent on pages, links clicked, features used

2.3. We use cookies, web beacons, and similar technologies to collect information about your browsing activities. For more information about our use of cookies, please see our Cookies Policy.

#### 3. How We Collect Your Information

- 3.1. Direct Collection whereby you provide information to us when:
  - 3.1.1. Creating an account
  - 3.1.2. Making a purchase
  - 3.1.3. Subscribing to our newsletter
  - 3.1.4. Participating in surveys or promotions
  - 3.1.5. Contacting our customer service
  - 3.1.6. Posting on our forums or comment sections
- 3.2. Automated Collection through:
  - 3.2.1. Cookies and similar technologies
  - 3.2.2. Server logs
  - 3.2.3. Analytical tools
- 3.3. Third-party sources such as
  - 3.3.1. Business partners
  - 3.3.2. Service providers
  - 3.3.3. Data analytics providers
  - 3.3.4. Social media platforms (if you connect your account)
  - 3.3.5. Publicly available sources

#### 4. How We Use Your Information

- 4.1. We may use your information for various purposes, including to:
  - 4.1.1. Provide, maintain, and improve our Site and services
  - 4.1.2. Process and fulfil your transactions
  - 4.1.3. Create and manage your account
  - 4.1.4. Communicate with you about your account, services, promotions, and events

- 4.1.5. Respond to your inquiries and provide customer support
- 4.1.6. Personalise your experience and deliver content relevant to your interests
- 4.1.7. Monitor and analyse usage patterns and trends
- 4.1.8. Protect the security and integrity of our Site
- 4.1.9. Detect, prevent, and address technical issues, fraud, and illegal activities
- 4.1.10. Comply with legal obligations
- 4.1.11. Enforce our terms, conditions, and policies

# 5. Legal Bases for Processing (For EEA, UK, and Similar Jurisdictions)

- 5.1. If you are from the European Economic Area (EEA), United Kingdom, or similar jurisdictions, our legal basis for collecting and using your personal information will depend on the specific information concerned and the context in which we collect it. We generally rely on the following legal bases:
  - 5.2. **Consent**: Where you have given us explicit consent to process your personal information for a specific purpose.
  - 5.3. **Contractual Necessity**: Where processing is necessary to perform a contract with you or to take steps at your request before entering into a contract.
  - 5.4. **Legal Obligation**: Where processing is necessary to comply with our legal obligations.
  - 5.5. **Legitimate Interests**: Where processing is necessary for our legitimate interests or the legitimate interests of a third party, provided your interests or fundamental rights and freedoms do not override these interests.

#### 6. Disclosure of Your Information

- 6.1. We may share your information with third-party vendors, service providers, contractors, or agents who perform functions on our behalf, such as:
  - 6.1.1. Payment processors
  - 6.1.2. Cloud hosting providers
  - 6.1.3. Customer service providers

- 6.1.4. Marketing and analytics services
- 6.1.5. IT and security services
- 6.2. If we are involved in a merger, acquisition, financing, reorganisation, bankruptcy, or sale of all or a portion of our assets, your information may be transferred or disclosed as part of that transaction.
- 6.3. We may disclose your information if required to do so by law or in response to valid requests by public authorities (e.g., a court or government agency).
- 6.4. We may disclose your information to:
  - 6.4.1. Enforce our agreements, policies, and terms of use
  - 6.4.2. Protect the security or integrity of our Site and services
  - 6.4.3. Protect ourselves, our users, or others from fraudulent, abusive, or unlawful use
  - 6.4.4. Investigate potential violations or illegal activities
- 6.5. We may share your information with third parties when we have your consent to do so.

#### 7. Data Retention

- 7.1. We will retain your personal information only for as long as necessary to fulfil the purposes for which we collected it, including to satisfy any legal, accounting, or reporting requirements. To determine the appropriate retention period, we consider:
  - 7.1.1. The amount, nature, and sensitivity of the personal information
  - 7.1.2. The potential risk of harm from unauthorised use or disclosure
  - 7.1.3. The purposes for which we process the information and whether we can achieve those purposes through other means
  - 7.1.4. Applicable legal requirements
- 7.2. In some circumstances, we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice.

### 8. Data Security

8.1. We have implemented appropriate technical and organisational measures to protect the security of your personal information. However, please understand that no method of transmission over the Internet or method of electronic

storage is 100% secure. While we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its security.

# 9. Your Rights and Choices

- 9.1. You may have the following rights under law:
  - 9.1.1. **Right to Information**: As detailed in this policy, you have the right to be informed about how we use cookies and process your data.
  - 9.1.2. Right to Consent: We rely on your consent to use non-essential cookies. As described below, you can manage your cookie preferences through your browser settings.
  - 9.1.3. **Right to Acces**s: You have the right to request access to the data collected by cookies that relate to you.
  - 9.1.4. Right to Erasure (in certain circumstances): You have the right to request the deletion of your personal data collected by cookies, subject to legal requirements.
  - 9.1.5. **Right to Object**: You have the right to object to the processing of your personal data collected by cookies.

# 10. Marketing Communications

- 10.1. You can opt out of receiving marketing communications from us by:
  - 10.1.1. Clicking the "unsubscribe" link in our emails
  - 10.1.2. Adjusting your communication preferences in your account settings
  - 10.1.3. Contacting us using the information in the "Contact Us" section
- 10.2. Even if you opt out of marketing communications, we may still send you non-promotional communications, such as those about your account, our ongoing business relations, or as required by law.

# 11. Children's Privacy

11.1. Our Site is not intended for children under the age of 13 (or higher age as required by local law). We do not knowingly collect personal information from children. If you are a parent or guardian and believe your child has provided us with personal information, please contact us, and we will delete such information from our systems.

#### 12. International Data Transfers

- 12.1. We may transfer, store, and process your information in countries other than yours. Our servers may be located outside your country of residence.
- 12.2. If you are located in the EEA, UK, or other regions with data protection laws that may differ from those where our servers are located, please note that we may transfer your personal information to countries that may not provide the same level of protection. When we do so, we use appropriate safeguards to ensure the protection of your personal information, such as:
  - 12.2.1. Standard Contractual Clauses approved by the European Commission
  - 12.2.2. Binding Corporate Rules
  - 12.2.3. Other legally recognised transfer mechanisms

# 13. Third-Party Links and Services

13.1. Our Site may contain links to third-party websites, services, or content not owned or controlled by us. We are not responsible for the privacy practices of such third parties. We encourage you to review the privacy policies of any third-party websites you visit.

# 14. California Privacy Rights

14.1. If you are a California resident, you may have additional rights under the California Consumer Privacy Act (CCPA) and other California privacy laws.

# Do Not Track Signals

15.1. Some browsers have a "Do Not Track" feature that signals to websites that you visit that you do not want your online activity tracked. Due to the lack of a common interpretation of Do Not Track signals, our Site may not currently respond to them.

# 16. Changes to Our Privacy Policy

- 16.1. We may update this Privacy Policy from time to time to reflect changes in our practices or for other operational, legal, or regulatory reasons. The updated policy will be effective as of the "Last Updated" date at the top of this policy. We encourage you to review this Privacy Policy periodically.
- 16.2. We will notify you of any material changes by:
  - 16.2.1. Posting the new Privacy Policy on our Site
  - 16.2.2. Updating the "Document Control" date at the top of this Privacy Policy

16.2.3. Sending an email notification to the email address associated with your account (for significant changes)

# 17. Contact Us

17.1. Our privacy team oversees compliance with this privacy policy. If you are located in the EEA or the UK, Sibylline Labs LIMITED is the data controller for your personal information. If you have any questions about it or how we handle your personal information, please contact <a href="mailto:privacy@sibylline.group">privacy@sibylline.group</a>.