

Early Access and Early Backer Membership Privacy Policy

To provide you with Early Access or Early Backer Membership, Fumarii Technologies Ltd, of 69 Church Way, North Shields, United Kingdom, NE29 0AE (**Fumarii**) (**we, our or us**) needs to process your personal data.

This policy is for Early Access or Early Backer Membership only. Any future products, trials, and launches will be followed up with further privacy information.

As the controller of your personal data, we are responsible for and control the processing of the personal data you give us or to which we have access during your membership.

We are committed to protecting and respecting your privacy. This policy (together with our terms of and conditions (available at www.fumarii.com/terms-conditions-EAM) and any other documents referred to on it) sets out the basis on which personal data will be processed by us. Please read this policy carefully to understand our views and practices regarding your personal data and how we will treat it.

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1. Why we have your data

You've purchased our \$5 (Plus Tax) Early Access Membership, or registered for free as an Early Backer, and we need your data to keep up our end of the bargain, namely to provide you with the membership and benefits.

If you have not purchased Early Access Membership or registered as an Early Backer and we have contacted you about it, this is because you have previously engaged with us or shown interest in Fumarii or the product, and we're letting you know it's now available. We don't want any of our community to feel like they've missed out on this opportunity.

Or, it might be that you've been referred to us by an influencer, or another member of our international community. You might have found us via one of our managed community interest pages on **Facebook**. Our community interest pages will have our company details in the about us section.

However you've found us, please read on to see how we will use your data if you do choose to purchase Early Access Membership or register as an Early Backer (we will refer to both options as **Membership**, and accordingly **Member**, or **Members**, throughout the rest of this policy).

2. Information we collect

Personal data, or personal information, means any information about an individual from which they can be identified. It does not include data where the identity has been removed (**anonymous data**).

We process the following personal data when you sign up for Membership.

- **Identity Data** – your name;
- **Contact Data** - billing address (if you make any purchases) and email address;

- **Financial Data** (of Early Access Members only) - payment and transaction details of your membership purchase, and any subsequent purchases of merchandise available to Members;
- **Technical Data** – we use a traffic tracker service who may provide us with anonymous reporting, including internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website;
- **Member Data** – your membership number, generated by us on your registration or purchase; usage of your membership number (as a referral code) by other members; details of purchases made by you, your marketing preferences, feedback, chat room comments and activity, and survey responses.

We also collect, use and share anonymous aggregated data such as statistical or demographic data. For example, we may aggregate data to calculate the percentage of users accessing a specific feature.

We do not collect any **Special Categories of Personal Data** about you (this 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). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

We cannot offer you Membership unless a name and email address is provided, as we are unable to process the purchase or administer your Membership otherwise.

2. How is your personal data collected?

We collect data directly from you, our members. If your membership number is used as a referral code, this is notified to us via registrations by other users. Some data is generated by us, specifically your membership number, and your activity and transaction records.

Anonymous traffic data about you is provided by **OmniStar**, and analytics and chat community usage is monitored and reported back to us where necessary by **Slack**. There are more details about our third party service providers below.

Information about other people: If you give us information on behalf of someone else, you confirm that the other person has appointed you to act on his/her behalf.

Monitoring: We may monitor and record communications with you (such as chat room comments and emails) for the purposes of quality assurance, training, fraud prevention and compliance.

3. Purposes for which we will use your personal data

We have set out below a description of all the ways we use your personal data, how long we keep that data for, and our legal basis for doing so under the General Data Protection Regulation (EU) 2016/679 and the Data Protection Act 2018.

Purpose/Activity	Retention period	Lawful basis for processing
To register you as a Member.	Until the full Fumarii product launch date (Launch) plus 6 months.	Performance of our contract with you to provide the Membership.
To process and provide your membership, including to: <ol style="list-style-type: none"> 1. manage payment(s) (including details of refunds); 2. create your 	Until Launch, plus 6 months, unless you ask us to delete your data sooner. If you subscribe thereafter, for as long as you are a customer, and in line with	Performance of our contract with you to provide the Membership.

<p>membership number (also your referral code);</p> <ol style="list-style-type: none"> 3. enter you into the prize draw (after use of your code, or if you used a referral code on sign-up); 4. allow your access to our Slack chat community; and 5. send you the Early Access Membership by email, containing downloads, discount codes, the terms of Membership, and other information required to access the full Membership and benefits (as applicable). 	<p>privacy information that will be provided at the point of your subscription.</p> <p>Payment data is kept by PayPal or Stripe, and we will only have access to your billing address and confirmation of transactions. This data is deleted after 6 months.</p>	
<p>To contact you about:</p> <ol style="list-style-type: none"> 1. service updates, including letting you know if a trial or Launch is coming up; 2. how to stay with us on Launch, including accessing the lifetime discounts and VPN; 3. product changes and news; 4. changes to our terms and conditions and use policies; 5. decisions we make about your Membership; 6. requesting your participation in surveys or to give feedback; and 7. asking for your consent if we want to do anything further with your personal data. 	<p>Until Launch plus 6 months. If you subscribe thereafter, for as long as you are a customer, and in line with privacy information that will be provided at the point of your subscription. (If you don't subscribe or maintain your Membership within six months of the full product launch, access to VPN and lifelong discount benefits will be lost, in line with our terms and conditions which are available at www.fumarii.com/terms-conditions-EAM.)</p>	<p>Performance of our contract with you to provide the Membership; to comply with legal obligations to update you on service and policy changes; and for our legitimate interests to develop our product, our company and our community by meaningful correspondence with our Members.</p>
<p>To manage, respond to and where necessary follow up any queries, comments, feedback or complaints you make, via any medium.</p>	<p>We'll keep these on file for 7 years, when our email correspondence is automatically deleted; and anonymously for training and service improvement purposes indefinitely thereafter. Comments made on public platforms may be left up as long as the corresponding page is active.</p>	<p>This may be performance of our contract, or legitimate interests to give you the best customer service we can, or improve our product(s).</p>
<p>To administer the prize draw.</p>	<p>Until the competition has been completed and prizes</p>	<p>This is performance of our contract with you.</p>

	<p>have been successfully claimed, plus one month. (If your contract is terminated in line with our terms and conditions for whatever reason, or you change your mind about being a Member, you will be disqualified from the prize draw but your data will still be stored in the entrants database until the competition has been closed.)</p>	
<p>To publish or make available information to show a valid award took place. Fumarii will send the surname and county of prize winners and, if applicable copies of their winning entries, to anyone requesting this information within one month after the closing date.</p>	<p>Prize winners' surname, county and winning entries will be kept for 6 months after the competition has been completed and prizes have been successfully claimed.</p>	<p>This is an obligation of the <u>CAP Code</u>. If you object to any or all of your surname, county and winning entry being made available, please contact us at support@fumarii.com</p> <p>Fumarii has in any event a legal obligation to provide the Advertising Standards Agency with the details of prize winners (surname, county and winning entry) if any complaints or investigations are made into the results of our competition(s).</p>
<p>To send you general marketing information about us and our products.</p>	<p>Email addresses only will be stored in our marketing database until you select the unsubscribe option in any of the emails we send you; or we can see that you have not opened or read any of our emails for 5 years.</p>	<p>If you let us know you want us to, by ticking the consent box at sign-up.</p>
<p>To publicise your name (or alias) and prize if you win the prize draw; and to post comments you have made that make us sound great in future marketing or advertising campaigns.</p>	<p>Once it is published into the public domain it could be on sites, archive sites, or social media forever. We will keep an internal record of past marketing campaigns for up to 10 years.</p>	<p>Only after seeking and being given your prior consent! We may use your comments anonymously without your consent, if we can be sure of preserving your anonymity.</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).</p>	<p>Anonymous analytics data is kept indefinitely for possible future statistics and report generation.</p>	<p>Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise).</p>
<p>To add you to our wall of fame!</p>	<p>The wall of fame will be there as long as we are... but you can ask us to take your name down at any point.</p>	<p>As a member benefit, you can simply opt-out should you not wish for your name to be on the wall of fame, by contacting support@fumarii.com. Opting-out is irreversible (unless you re-purchase or re-register for</p>

		Membership with a different email address!)
To deliver relevant social media content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.	As long as you are active and engage with us on social media.	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy, and strictly in compliance with the terms of use of the social media platforms we use, and your own privacy and ad-choice settings on those platforms).
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences.	As long as you are active and engage with us on our website and as a member of our community.	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy).
To administer, monitor and protect our chat community. Our community chatroom is provided and administered by Slack . You are advised to read their privacy policy (fumarii.com/privacy-policy) and terms of service (fumarii.com/terms-conditions-EAM) before using this chat function.	Until Launch plus six months, unless we need a keep a record of any particular exchanges or incidents to protect our interests or those of a third party, for up to three years.	We have a legitimate interest to maintain a safe and friendly community. We may also have a legal obligation to kick you out if you are behaving in a threatening or unlawful way, or may need to ask you to leave to under the terms of our contract with you, set out in our terms and conditions (fumarii.com/terms-conditions-EAM).
We may keep a record of banned users or IP addresses; as well as requests for deletion of accounts/ data.	As long as the company is active.	To protect our interests. If you think this interferes with your rights, let us know and we can re-assess our reason for keeping this data.

4. Disclosure of your personal data

We may share your information with the following third parties including:

- **PayPal** and/or **Stripe** – as allocated by you to process payments;
- **Slack** – if you use the Slack chatroom service; and
- analytics and search engine providers that assist us in the improvement and optimisation of our website.

Fumarii's data is cloud-hosted, so our service provider as a data processor may have access to your personal data for support and maintenance purposes.

We may disclose your personal information to third parties:

- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- if all, or substantially all, of our assets are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets; and
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms and conditions (fumarii.com/terms-conditions-EAM) other agreements; or to protect the rights, property, or safety of our

customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. 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.

We do not give your personal data back to influencers if you use their code.

We only provide your data to our partners if you give us your consent to do so.

5. Cookies

A cookie is a small text file which is placed onto your computer (or other electronic device) when you access our website. Cookies are small files saved to your computer's hard drive that track, save and store information about your interactions and usage of the site.

We use cookies to provide a tailored user experience while visiting the Fumarii website. This software is provided by Google Analytics which uses cookies to track visitor usage. The software will save a cookie to your computer's hard drive in order to track and monitor your engagement and usage of the website, but will not store, save or collect personal information. You can read Google's privacy policy here for further information <http://www.google.com/privacy.html>.

How to turn off cookies

If you do not want to accept cookies, you can change your browser settings so that cookies are not accepted. For further information about cookies and how to disable them please go to: www.aboutcookies.org or www.allaboutcookies.org

6. International Transfers

Many of our external third parties are 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 certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- 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.

7. Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. However, the transmission of information via the internet is never completely secure. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Your rights

You have the right to:

Request access to your personal data (commonly known as a "data subject access request").

Request correction of any inaccurate personal data that we hold about you. Please keep us informed if your personal data changes during your relationship with us.

Request erasure of your personal data where there is no good reason for us continuing to process it.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) if there is something about your particular situation which makes you feel this processing impacts on your fundamental rights and freedoms. You have the absolute right to object where we are processing your personal data for direct marketing purposes.

If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by writing to or emailing us at support@fumarii.com

Request restriction of processing of your personal data if you want us to establish the data's accuracy; where our use of the data is unlawful but you do not want us to erase it; where you need us to hold the data to establish, exercise or defend legal claims; or you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party in a structured, commonly used, machine-readable format.

Withdraw consent at any time where we are relying on consent to process your personal data. This will not affect the lawfulness of any processing carried out before you withdraw your consent.

Complain at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

9. Contact

Questions, comments and requests regarding this privacy policy, how we use and protect your personal data and your rights as a data subject are welcomed. Please contact us at: support@fumarii.com