

PRIVACY POLICY

Last update: 28 April 2023

YouHold LTD, a company duly registered under the laws of the UK, with principal office at 86-90 PAUL STREET, LONDON, ENGLAND EC2A 4NE («**YouHold LTD**», «**Us**», «**We**», or «**Our**») understand that Your privacy is important to You and are committed to providing You with the needed level of transparency and control over the data We are collecting and using.

This Privacy Policy (“Privacy Policy”) describes the information we process to support the website and mobile app offered by YouHold LTD. It also describes your choices regarding Our use of Your Personal Data and how You can access the information. We respect Your privacy, and We take protecting it seriously.

This Privacy Policy should be read together with Our **Terms of Service** – [link](#).

1. GENERAL INFORMATION

1.1. This Policy applies to the following people:

1.1.1. people who use the Service (for this Policy, We define the term “**You**”, and “**Your**”, as a person which has access to the Service);

1.1.2. people who make complaints to Us by email.

1.2. **We do not sell Your Personal Data to third parties.** A “sale” of Personal Data under the [CCPA](#) is defined broadly to include the “**selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means**” the Personal Data of a Consumer to another business or third party “for monetary or other valuable consideration”. If We decide to sell the Service, We will inform You about this, so You can forbid Us to transfer Your Personal Data together with Our business. If so, We will delete Our Data from the databases prior to a business transfer.

2. TERMS AND DEFINITIONS

2.1. The following terms shall have the following meaning:

2.1.1. “**Service**” — all the services offered by YouHold LTD including but not limited to the website, mobile app, and other products and features offered by YouHold LTD, and other services YouHold LTD may introduce in future.

2.1.2. “**Personal Data**” — data about a living individual who can be identified from that data (or from that and other information either in Our possession or likely to come into Our possession).

2.1.3. “**Usage Data**” — is data collected automatically either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

2.1.4. “**Cookies**” — are small files, usually consisting of letters and numbers, that are downloaded to the device (computer or mobile device) when a user visits a particular website stored on Your device (computer or mobile device). Cookies allow a website to recognize a user's device.

2.1.5. “**Data Controller**” — a natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and how any Personal Data are or are to be, processed.

2.1.6. “**Data Processors (or Service Providers)**” — any natural or legal person who processes the data on behalf of the Data Controller. We may use the services of various Service Providers to process Your

data more effectively.

2.1.7. “User” — is the individual using Our Service. The User corresponds to the Data Subject, who is the subject of Personal Data.

3. DATA CONTROLLER

3.1. YouHold LTD (**with principal office at 86-90 PAUL STREET, LONDON, ENGLAND EC2A 4NE**) is the Data Controller that is responsible for the Personal Data collected and used within the scope of this Privacy Policy.

4. PRINCIPLES OF DATA PROCESSING

4.1. We adhere to the following principles to protect Your privacy:

4.1.1. principle of lawfulness and transparency — We process Personal Data lawfully and transparently concerning the data subject;

4.1.2. principle of purpose limitation — We collected Personal Data for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes;

4.1.3. principle of data minimization — We collect adequate Personal Data, relevant and limited to what is necessary concerning the purposes for which We are processed Personal Data;

4.1.4. principle of data accuracy — We accurate Personal Data and, where necessary, keep up to date. We take every reasonable step to ensure that inaccurate Personal Data, having regard to the purposes for which they are processed, are erased or rectified without delay;

4.1.5. principle of storage limitation — We keep Personal Data in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the Personal Data are processed;

4.1.6. principle of integrity and confidentiality — We process Personal Data in a manner that ensures appropriate security of the Personal Data, including protection against unauthorized or unlawful processing and accidental loss, destruction, or damage, using appropriate technical or organizational

measures.

5. PERSONAL DATA THAT WE COLLECT AND PROCESS

5.1. To fulfill Our obligations on provision of Service “**YouHold LTD**” for You and applicable Terms of Service, We are entitled to ask You to provide Us with Your Personal Data, including (but not limited):

- 5.1.1.** First name, last name — to register;
- 5.1.2.** Email address — to register;
- 5.1.3.** Phone number — to register;
- 5.1.4.** Country and city of residence — to register;
- 5.1.5.** Billing address (card number, expiration date, CVV code, name on the card) — to register and to process online payments;

5.2. We may collect Personal Data from You in a variety of ways and circumstances, including, but not limited to, access to the **YouHold LTD**, a subscription to a newsletter, filling out a form, and providing Us with feedback. We shall be entitled to combine Personal Data collected in the course of Your interaction with different sections of the Service with any other relevant available information.

6. PERSONAL DATA, COLLECTED IN AN AUTOMATIC WAY (USAGE DATA)

6.1. We may also automatically collect data about the devices You use to interact with Our Service. Personal Data automatically collected by or transmitted to Us in the course of accessing, interacting, and operating the Service may include, without limitation, the following Personal Data:

- 6.1.1. device information**, which may include (but is not limited to) information about the personal computer or laptop You use to access the Service including the hardware model, operating system and version, the Service You use, and other device identifiers;
- 6.1.2. server log information**, which may include (but is not limited to) Your location, city and language;
- 6.1.3. information collected by cookies and other similar technologies.** We and Our service providers use various technologies to collect information when You interact with **YouHold LTD**, including Cookies and other similar technologies. Cookies are small data files that are stored on Your device when you visit a website or mobile app, which enables Us to collect information about Your device identifiers, IP address, web browsers used to visit the website or mobile app, pages or features viewed, time spent on the website or mobile app, and links clicked. Where required, You will be asked for consent to Our use of cookies.

7. USE OF PERSONAL DATA

7.1. YouHold LTD uses the collected data for various purposes:

- 7.1.1.** to provide and maintain Our Service;
- 7.1.2.** to notify You about changes to Our Service;
- 7.1.3.** to allow You to participate in interactive features of Our Service when You choose to do so;
- 7.1.4.** to provide customer support;
- 7.1.5.** to gather analysis or valuable information so that We can improve Our Service;
- 7.1.6.** to monitor the usage of Our Service;
- 7.1.7.** to detect, prevent and address technical issues;
- 7.1.8.** to fulfill any other purpose for which You provide it;

- 7.1.9.** to carry out Our obligations and enforce Our rights arising from any contracts entered into between You and us, including for billing and collection;
- 7.1.10.** to provide You with notices about Your account and/or subscription, including expiration and renewal notices, email instructions, etc.;
- 7.1.11.** to provide You with news, special offers, and general information about other goods, services, and events which We offer that are similar to those that You have already purchased or enquired about unless You have opted not to receive such information;
- 7.1.12.** in any other way We may describe when You provide the information;
- 7.1.13.** for any other purpose as We determine, in Our sole discretion, to be necessary or required to ensure the safety and/or integrity of Our users, employees, third parties, public, and/or Our Services, or to comply with requirements of any applicable law.

8. CONSENT TO PERSONAL DATA PROCESSING

8.1. Consent to Personal Data Processing

- 8.1.1.** By accepting this Privacy Policy, You approve to have reached the age of majority or the legal age in Your jurisdiction (generally 18 or older), are solely responsible for all Your actions, and fully understand the statements outlined in this Privacy Policy.
- 8.1.2.** We will process Your Personal Data only in the case We have received from You a freely given, specific, informed, and unambiguous indication of Your wishes by which You signify agreement to the processing of Your Personal Data («**Consent**»).
- 8.1.3.** Your Consent covers all processing activities with Your Personal Data carried out for the same purpose or purposes. When the processing has multiple purposes, Your Consent should be deemed given for all of them.

9. COMPLIANCE WITH GENERAL DATA PROTECTION REGULATION (GDPR), CALIFORNIA CONSUMER PRIVACY ACT (CCPA), AND OTHER LAWS

- 9.1.** Your Personal Data is processed in accordance with the generally recognized norms of international and the UK law, as well as the norms applicable to you, including but not limited to:
 - 9.1.1.** If you are located in the United Kingdom, all processing of Personal Data is performed in accordance with regulations and rules following the [Data Protection Act 2018](#) (“DPA 2018”).
 - 9.1.2.** If You are located in California, all processing of Personal Data, is performed in accordance with regulations and rules following the [California Consumer Privacy Act](#), Cal. Civ. Code § 1798.100 *et seq.* (“CCPA”).
 - 9.1.3.** If You are located in the European Economic Area (EEA) privacy rights are granted and all processing of Personal Data is performed by regulations and rules following the [Regulation \(EU\) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons concerning the processing of Personal Data and on the free movement of such data, known as the General Data Protection Regulation](#) («GDPR»).
 - 9.1.4.** If You are located in Canada, all processing of Personal Data is performed in accordance with regulations and rules following [Personal Information Protection and Electronic Documents Act](#) (S.C. 2000, c. 5) («PIPEDA»).

10. THE RIGHTS OF USERS

10.1. Subject to possible restrictions under applicable national law of the data subject You may have certain rights regarding the Personal Data that We collect on You, particularly:

10.1.1. Right to access. You may contact Us to get confirmation as to whether or not We are processing Your Personal Data;

10.1.2. Right to withdraw consent. In case Our processing is based on the consent granted, You may withdraw the consent at any time by contacting Us. You can withdraw Your consent at any time by replying to the email with Your withdrawal and Your Personal Data will be deleted immediately. Withdrawing consent may lead to fewer possibilities to use the Service;

10.1.3. Right to object. In case Our processing is based on a legitimate interest to run, maintain and develop Our business, You have the right to object at any time to Our processing. We shall then no longer process Your personal data unless for the provision of Our services or if We demonstrate other compelling legitimate grounds for Our processing that override Your interests, rights, and freedoms or for legal claims. Notwithstanding any consent granted beforehand for direct marketing purposes, You have the right to prohibit Us from using personal data for direct marketing purposes, by contacting Us;

10.1.4. Right to restriction of the processing. You have the right to obtain from Us restriction of processing of Your personal data, as foreseen by applicable data protection law, e.g. to allow Our verification of the accuracy of personal data after You contest the accuracy or to prevent Us from erasing personal data when personal data are no longer necessary for the purposes but still required for Your legal claims or when Our processing is unlawful. Restriction of processing may lead to fewer possibilities to use the Service;

10.1.5. Right to complain. You have the right to complain to any relevant Data Protection Authority, in particular in the Member State of Your residence, place of work, or the place of processing Your personal data. If You wish to exercise any of the aforementioned rights, please Contact Us via legal@youhold.com.

10.2. How to use these rights. To exercise any of the above—mentioned rights, You shall send Us a letter or email to the address set out below under the Privacy Policy, including the following information: name, address, phone number, email address, and a copy of a valid proof of identity. We may request additional information necessary to confirm Your identity. We may reject requests that are unreasonably repetitive, excessive, or manifestly unfounded.

10.3. You may have other rights under the law applicable in Your jurisdiction.

11. DATA STORING AND DELETION

11.1. We store Your Personal Data for as long as needed to provide You with Our Service. We may store Data longer, but only in a way that it cannot be tracked back to You. When Personal Data is no longer needed, We delete it using reasonable measures to protect the Data from unauthorized access or use.

11.2. EU Territory. We store Personal Data as long as it is needed for the provision of Our Service. Traffic information is erased or made anonymous when it is no longer needed for the transmission or, in the case of payable Service, up to the end of the period during which the bill may lawfully be challenged or payment pursued. Direct marketing and provision of value-added Service information (including traffic information used for these purposes) are stored as long as the same is necessary for the provision of these activities, or up to the time when a User opts out from such use under this Privacy Policy. Other information is stored for as long as We consider it to be necessary for the provision of Our Service. This Section shall not prevent any technical storage or access to information for the sole purpose of carrying out the transmission of a communication or as strictly necessary for Us to provide the Service You requested.

11.3. US Territory. We will retain collected information for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by applicable legislation.

11.4. Storing might be different depending on the territory of collecting the information and the applicable legislation, but We always strive to store the information only as long as it is needed to provide, improve, or personalize Our Service.

11.5. The information which You provide to Us will be erased within one hundred and eighty (180) days. If you request the deletion of Your personal data within 180 days, We will delete it immediately. Within 180 days You can restore Your account by starting to use it, and this period automatically ends.

11.6. We do not intentionally collect or maintain information from persons under the age of 13. If we become aware that we have unknowingly collected personally identifiable information from a child under the age of 18, we will make reasonable efforts to delete such information from our records. If you believe that we may have any information about children under the age of 18, please contact our Support Service at legal@youhold.com

12. TRANSFER OF DATA

12.1. Your information, including Personal Data, may be transferred to – and maintained on – computers located outside of Your state, province, country, or other governmental jurisdiction where the data protection laws may differ from those of Your jurisdiction.

12.2. If You are located outside the UK and choose to provide information to us, please note that We transfer the data, including Personal Data, to the UK and process it there.

12.3. Your consent to this Privacy Policy followed by Your submission of such information represents Your agreement to that transfer.

12.4. YouHold LTD will take all the steps reasonably necessary to ensure that Your data is treated securely and in accordance with this Privacy Policy and no transfer of Your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of Your data and other personal information.

13. DO NOT TRACK SIGNALS

13.1. “Do Not Track” (“DNT”) is a preference You can set in Your web browser to let the websites You visit know that You do not want them collecting data about You. At this time, this website does not respond to DNT or similar signals.

14. DATA SECURITY

14.1. We care to ensure the security of Personal Data. We follow generally accepted industry standards to protect the information submitted to Us, both during transmission and once We receive it. We maintain technical, physical, and administrative security measures to provide reasonable protection for Your Personal Data. When We or Our contractors process Your information, We also make sure that Your information is protected from unauthorized access, loss, manipulation, falsification, destruction, or unauthorized disclosure. This is done through appropriate administrative, technical, and physical measures.

14.2. There is no 100% secure method of transmission over the Internet or method of electronic storage. Therefore, We cannot guarantee its absolute security.

14.3. We never process any kind of sensitive data or criminal offense data. Also, We never undertake to profile Personal Data.

15. CONTRACTORS

15.1. We work with third-party services providers, who provide website or mobile app development, hosting, maintenance, and other services for us. These contractors may have access to, or process Personal Data on behalf of Us as part of providing those services for Us. We limit the information provided to these Service providers to that which is reasonably necessary for them to perform their functions.

15.2. All data transfers are performed in accordance with the highest security regulations.

15.3. We use **Google Analytics** to create detailed statistics of website users. The statistics are collected on Google's server; the User only places JS code on the pages of his or her website. The tracking code is triggered when the User opens the page in his or her web browser. For more information on the privacy practices of Google Analytics, please visit the Privacy Policy: <https://policies.google.com/privacy?hl=en-US&privacy-policy/>.

15.4. We use **Facebook pixel** for targeted advertising on Facebook and Instagram. For more information on the privacy practices of the **Facebook pixel**, please visit the Privacy Policy: https://www.facebook.com/privacy/policy/?entry_point=data_policy_redirect&entry=0.

15.5. All data processed by Us is stored exclusively in secure hosting facilities provided by Leaseweb.

16. BEHAVIORAL REMARKETING

16.1. YouHold LTD uses remarketing services to advertise on third party websites to You after You visited Our Service. We and Our third-party vendors use Cookies to inform, optimize and serve ads based on Your past visits to Our Service.

17. PAYMENTS

17.1. We may provide paid products and/or services within Service. In that case, We use third-party services for payment processing (e.g. payment processors). We will not store or collect Your payment card details. That information is provided directly to Our third-party payment processors whose use of Your personal information is governed by their Privacy Policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, Mastercard, American Express, and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

18. LINKS TO THIRD-PARTY WEBSITES

18.1. This website may contain hyperlinks to third-party websites. We are not responsible for the content of such websites, or for how those websites collect, hold, use, and distribute any personal information You provide.

18.2. When visiting a third-party website from hyperlinks displayed on this website, We encourage You to review the Privacy Policies of those websites so that You can understand how the personal information You provide will be collected, held, used, and distributed.

19. USE OF THIS SERVICE BY MINORS

19.1. We understand the importance of protecting the privacy of minors, especially in the online environment. This Service is not designed for or intentionally targeted at minors under the age of 18, and We request that minors not use this Service. We do not knowingly collect data from minors on this Service. If We become aware that we have received data from a person under the age of 18, We will take reasonable steps to delete such data from Our records.

20. APPLICATION OF THIS PRIVACY POLICY

20.1. This Privacy Policy applies to the Service. Once redirected to another service, website, or mobile app, this Policy is no longer applicable.

21. ACCEPTANCE OF THESE CONDITIONS

21.1. By accepting the checkbox while registering in Service, You agree with the uploaded Privacy Policy and Terms of Service.

21.2. We assume that all Users have carefully read this document and agree to its content. If one does not agree with this Privacy policy, they should not use this website and mobile app.

22. CHANGES AND UPDATES TO OUR PRIVACY POLICY

22.1. From time to time, We may update this Privacy Policy. We encourage You to periodically check back and review this Privacy Policy so that You always will know what data We collect, how We use it, and with whom We share it.

23. CONTACT US!

23.1. If You have any questions, suggestions, or comments, please contact Us via email at legal@youhold.com.