

Cookable

Privacy Policy

Welcome to Cookable's Privacy Policy! We take the protection of your personal data very seriously and strictly adhere to all applicable laws and regulations on data protection, in particular the UK's Data Protection Act (DPA) and the General Data Protection Regulation (GDPR).

The following explanations provide you with an overview of how we ensure this protection and what data we process and for what purpose. If you have any questions, please contact us at team@cookable.co.uk.

Data Controller

The operator of the platform www.cookable.co.uk and thus the responsible party in the sense of the DPA and GDPR is:

Cookable
91 Ravensbury Road
London
SW18 4RX

E-mail: team@cookable.co.uk

Web: www.cookable.co.uk

Instagram: <https://www.instagram.com/cookablecourses/>

TikTok: <https://www.tiktok.com/@cookablecourses>

Facebook: <https://www.facebook.com/cookablecourses/>

Your Rights

First of all, we would like to inform you at this point about your rights as a data subject. These rights are standardised in Art. 15 - 22 GDPR. This includes:

- The right to information (Art. 15 GDPR),
- The right to erasure (Art. 17 GDPR),
- The right to rectification (Art. 16 GDPR),
- The right to data portability (Art. 20 GDPR),
- The right to restriction of data processing (Art. 18 GDPR),
- The right to object to data processing (Art. 21 GDPR).

To assert these rights, please contact us. The same applies if you have questions about data processing in our company. You also have the right to lodge a complaint with a data protection supervisory authority. The Information Commissioner's Office (ICO) is the for Cookable relevant authority in matters of data protection. You have the right to make a complaint at any time to the ICO (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO in the first instance.

Purposes and legal basis of data processing

Even when processing your personal data outside the website, the provisions of the GDPR and other relevant legal provisions are always complied with.

Your personal data is processed exclusively for the implementation of pre-contractual measures (e.g., for the preparation of offers for products or services) and for the fulfilment of contractual obligations (e.g., for the implementation of our service or for order/order/payment processing), (Art. 6 para. 1 p.1 lit. b GDPR) or if there is a legal obligation to process (e.g., due to tax law requirements) (Art. 6 para. 1 p.1 lit. c GDPR). The personal data were originally collected for these purposes.

Of course, your consent to data processing can also constitute a data protection permission requirement (Art. 6 para. 1 p. 1 lit. a GDPR). Before granting consent, we will inform you about the purpose of the data processing and about your right of revocation according to Art. 7 (3) GDPR.

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For the detection of criminal offences, personal data will only be processed under the conditions of Art. 10 GDPR.

Collection of general data and information

Log Files

Every time the platform is accessed and every time a file is retrieved, general data about this process is automatically stored in a log file. The storage serves exclusively system-related and statistical purposes (based on Art. 6 para. 1 letter b) GDPR), as well as in exceptional cases to report criminal offences (based on Art. 6 para. 1 letter e) GDPR).

The data is not passed on to third parties or evaluated in any other way, unless there is a legal obligation to do so (Art. 6 para. 1 letter e) GDPR).

In detail, the following data record is stored for each retrieval:

- Name of the retrieved file
- date and time of the retrieval
- amount of data transferred
- Message as to whether the retrieval was successful
- browser type and version
- description of the type of web browser used
- operating system used
- the previously visited page
- Provider
- IP address of the user

Cookies

Our platform uses so-called cookies in several places. They serve to make our offer more user-friendly, effective and secure. Cookies are small text files that are stored on your computer and saved by your browser (locally on your hard drive). Based on our legitimate interest (Art. 6 para. 1 p. 1 lit. f GDPR), we use technically necessary cookies that are required for the operation of the website and to ensure its functionality. Depending on the purpose, these are stored permanently - even after the session has ended - (so-called persistent cookies, e.g., opt-out) or are deleted when the browser is closed (so-called session cookies - these are only valid for one browser session). For further information please refer to our Cookie Policy.

Personal data

Personal data will only be processed by us if we are permitted to do so by law, or if you have given us your consent. In detail:

a. Contact

If you contact us, we store your data on the basis of Art. 6 (1) (b) GDPR for the purpose of processing your enquiry, as well as in the event that further correspondence should take place.

b. WhatsApp

We offer visitors to contact us via the messaging service [WhatsApp](#) of Meta Platforms Limited,. If you contact us via WhatsApp, we process the mobile phone number you use on WhatsApp and - if provided - your first and last name in accordance with your consent (Art. 6 para. 1 lit. a) GDPR) or the provision of a contractual or pre-contractual measure to process and respond to your request (Art. 6 para. 1 lit. b) GDPR).

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c. Conclusion of contract

After conclusion of the contract, you have the possibility to use the contents of our platform. We collect the following data for the purpose of concluding and executing the contract:

- First and last name
- E-mail address
- Password
- Payment data

The data you provide us with for the purpose of processing the contract will be processed by us exclusively for this purpose and, if necessary, used to contact you in connection with the contract.

In addition, the data you provide us with for the purpose of processing the contract will be transmitted by us to companies involved in the processing of the contract (in particular payment service providers). Payment data is collected as part of the ordering process. For orders on our site, you have the possibility to choose between different payment methods and processed using our Payment Gateway Paid Memberships Pro operated by [Stranger Studios, LLC](#). The legal basis for the data processing is Art. 6 (1) b) GDPR, as the processing is necessary for the performance of the contract.

c. Course Hub

After conclusion of the contract, you will be able to access our Course Hub. Here you can amongst other things, book your classes, check your itinerary, and use our additional resources. The data you provide us with for the purpose of processing the contract will also be used by us for the purpose of administering our Course Hub, and if necessary, for contacting you. The legal basis for this data processing is Art. 6 para. 1 letter b) GDPR.

d. Zoom

We use [Zoom](#) to conduct our classes and various types of data are processed when using Zoom. The scope of the data depends on the information you provide before or during participation in our classes. The legal basis for this is our legitimate interest in effective customer communication in accordance with Art. 6 Para. 1 lit. a) GDPR and to fulfil our contract with you (Art. 6 Para. 1 lit. b) GDPR).

e. Newsletter and communications

If you commission us with the provision of services and provide us with your e-mail address, this may subsequently be used by us to send you a newsletter and communications. In such a case, only direct advertising for our own similar goods or services will be sent via the newsletter.

No data will be passed on to third parties in connection with the processing of data for the dispatch of newsletters and communications. The data is used exclusively for sending the newsletter and communications.

The data is deleted as soon as it is no longer required to achieve the purpose for which it was collected. The user's e-mail address is therefore stored as long as the subscription to the newsletter is active.

The subscription to the newsletter can be cancelled by the user concerned at any time. For this purpose, there is a corresponding link in each newsletter. This also enables revocation of consent to the storage of personal data collected during the registration process.

The legal basis for the processing of the data after the user has registered for the newsletter is the user's consent (Art. 6 para. 1 lit. a GDPR). The legal basis for sending communications as a result of the sale of goods or services is Art. 6 para. 1 lit. f. and b. GDPR).

The newsletter is sent using the dispatch service provider "[MailChimp](#)", a newsletter dispatch platform of the US provider Rocket Science Group, LLC.

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You can view the privacy policy of the mailing service provider here: <https://mailchimp.com/legal/privacy/>. Mailchimp is used on the basis of our legitimate interests pursuant to Art. 6 Para. 1 lit. f GDPR and a processing agreement pursuant to Art. 28 Para. 3 p. 1 GDPR has been entered into.

Analytical and Tracking services

a. Google Analytics

We use Google Analytics, a service provided by [Google](#) Inc. This means that the data collected can in principle be transmitted to a Google server in the USA, whereby the IP addresses are anonymised by means of IP anonymisation so that an allocation is not possible. The IP address transmitted by your browser as part of Google Analytics will not be merged with other Google data. You can object to the collection and processing of this data by Google Analytics by setting an opt-out cookie that prevents the future collection of your data when you visit this website: <http://tools.google.com/dlpage/gaoptout?hl=en>. The legal basis for this processing is Art. 6 para. 1 letter f) GDPR, our legitimate interest.

b. Google Tag Manager

We use Google Tag Manager, a web analytics service provided by Google, Inc. This service allows website tags to be managed via an interface. The Google Tag Manager only implements tags. No cookies are set, and no personal data is collected. The Google Tag Manager triggers other tags that may collect data. The Google Tag Manager does not access this data.

If a deactivation has been made at domain or cookie level, it remains in place for all tracking tags, insofar as these are implemented with the Google Tag Manager. More information on the Google Tag Manager can be found at the following link: <http://www.google.com/tagmanager/use-policy.html>. The legal basis for this processing is Art. 6 para. 1 letter f) GDPR, our legitimate interest.

c. Google AdSense

We use Google AdSense, a web advertising service provided by Google, Inc. Google AdSense uses so-called "DoubleClick DART Cookies" ("Cookies"). In addition, Google AdSense also uses so-called "web beacons" (small invisible graphics) to collect information, through the use of which simple actions such as user traffic on our online offer can be recorded, collected and evaluated. The information generated by the cookie and/or web beacon (including your IP address) about your visit to this website will be transmitted to and stored by Google on servers in the United States.

Google uses the information thus obtained to carry out an evaluation of user behaviour with regard to the AdSense ads. The IP address transmitted by your browser as part of Google AdSense will not be merged with other Google data. The information collected by Google may be transferred to third parties where required to do so by law, and/or where such third parties process the information on Google's behalf. The legal basis for this processing is Art. 6 para. 1 letter f) GDPR, our legitimate interest.

d. Facebook Remarketing

Within our website, so-called "Facebook pixels" of the social network [Facebook](#), which is operated by Meta Platforms Inc., 1 Hacker Way, Menlo Park, CA 94025, USA, or if you are a resident of the EU, Facebook Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland ("Facebook"), are used. With the help of the Facebook pixel, it is possible for Facebook to determine the visitors to our offer as a target group for the display of advertisements, so-called "Facebook ads". Accordingly, we use the Facebook pixel to display the Facebook ads placed by us only to those Facebook users who have also shown an interest in our website. This means that with the help of the Facebook pixel we want to ensure that our Facebook ads correspond to the potential interest of the users and do not have a harassing effect. With the help of the Facebook pixel, we can also track the effectiveness of the

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Facebook ads for statistical and market research purposes by seeing whether users were redirected to our website after clicking on a Facebook ad.

You can object to the collection by the Facebook pixel and use of your data for the display of Facebook ads. To do so, you can visit the page set up by Facebook and follow the instructions there on the settings for usage-based advertising: <https://www.facebook.com/settings?tab=ads> or declare the objection via the US page <http://www.aboutads.info/choices/> or the EU page <http://www.youronlinechoices.com/>. The legal basis for this processing is Art. 6 para. 1 letter f) GDPR, our legitimate interest.

Security and Storage

Duration of storage

Your personal data will be stored for the duration of the respective legal retention period and then routinely deleted, unless your personal data is still required thereafter to achieve the respective purpose of storage (e.g., for contract fulfilment or contract initiation).

Security

State-of-the-art internet technologies are used to ensure the security of your data. During the online enquiry process, your details are secured with SSL encryption. For secure storage of your data, the systems are protected by firewalls that prevent unauthorised access from outside. In addition, technical and organisational security measures are used to protect the personal data you have provided against accidental or intentional manipulation, loss, destruction or access by unauthorised persons.

Social Media

We are present in various "social media" platforms in order to communicate with the customers, interested parties and users registered there and to be able to inform them about our offers there.

We would like to point out that you use these platforms and their functions on your own responsibility. This applies in particular to the use of the interactive functions (e.g., commenting, sharing, rating).

In addition, your data may be processed for market research and advertising purposes. For example, usage profiles can be created from your usage behaviour and the resulting interests. This allows, for example, advertisements to be placed within and outside the platforms that presumably correspond to your interests. Cookies are usually stored on your computer for this purpose. Independently of this, data that is not directly collected from your end devices may also be stored in the usage profiles (especially if you are a member of the respective platforms and are logged in to them).

We, as the provider of this information service, do not collect and process any data from your use of our service beyond this.

The processing of users' personal data is based on our legitimate interests in providing users with effective information and communicating with users pursuant to Art. 6 para. 1 p.1 lit. f. GDPR. If you are asked by the respective providers for consent to data processing, the legal basis for processing is Art. 6 para. 1 sentence 1 lit. a., Art. 7 GDPR.

If you are a member of a social network and do not want the network to collect data about you via our website and link it to your stored membership data with the respective network, you must

- log out of the respective network before visiting our website,
- delete the cookies on your device and
- close and restart your browser.

After logging in again, however, you will once more be recognisable to the network as a specific user. In the case of requests for information and the assertion of user rights, we would also like to point out that these can most effectively be asserted with the providers. Only the providers have access to the

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users' data and can take appropriate measures and provide information directly. If you still need help, you can contact us.

Miscellaneous and Closing

Updating your information

If you believe that the information, we hold about you is inaccurate or that we are no longer entitled to use it and want to request its rectification, deletion, or object to its processing, please do so within your account or contact us. For your protection and the protection of all of our users, we may ask you to provide proof of identity before we can answer the above requests.

Keep in mind, we may reject requests for certain reasons, including if the request is unlawful or if it may infringe on trade secrets or intellectual property or the privacy of another user. Also, we may not be able to accommodate certain requests to object to the processing of personal information, notably where such requests would not allow us to provide our service to you anymore.

Links to other providers

Our website also contains - clearly recognisable - links to the websites of other companies. Insofar as there are links to websites of other providers, we have no influence on their contents. Therefore, no guarantee or liability can be assumed for these contents. The respective provider or operator of the pages is always responsible for the content of these pages.

The linked pages were checked for possible legal violations and recognisable infringements at the time of linking. Illegal contents were not recognisable at the time of linking. However, permanent monitoring of the content of the linked pages is not reasonable without concrete indications of a legal violation. Such links will be removed immediately if infringements of the law become known.

Changes and updates to the privacy policy

We kindly ask you to regularly inform yourself about the content of our privacy policy. We will amend the privacy policy as soon as changes to the information processing activities we carry out make this necessary. We will inform you as soon as the changes require an act of cooperation on your part (e.g., consent) or other individual notification.

Concerns and Contact

If you have any concerns about a possible compromise of your privacy or misuse of your personal information on our part, or any other questions or comments, you can contact us at team@cookable.co.uk.