# PRIVACY AND COOKIES

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"We", "Us" and "Our" refers to "ClaimingMadeEasy", a trading name of Approved Claims Group Ltd. respects the privacy of Our users ("User" "You" or "Your"). This Privacy Policy explains how We collect, use, disclose, and safeguard Your information when You use our website (the "Website"). We will only use the information that We collect about You lawfully (in accordance with the Data Protection Act 1998, the EU General Data Protection Regulation 2018 and the Privacy and Electronic Communications (Amendment) Regulations 2018). We reserve the right to update and modify this Privacy Policy at any time and for any reason. You are encouraged to periodically review this Privacy Policy to stay informed of updates. IF YOU DO NOT AGREE WITH THE TERMS OF THIS PRIVACY POLICY, PLEASE DO NOT ACCESS THE WEBSITE.C

#### **Collection And Use Of Your Information**

We collect several types of information from and about Users of Our Website, including information:

- By which You may be personally identified, such as name, postal address, email address, telephone number or any other identifier by which You may be contacted online or offline ("personal information"); and/or
- About Your internet connection, the equipment You use to access Our Website and usage details.

#### We Collect This Information

- Directly from You when You provide it to Us.
- Automatically as You navigate through the Website. Information collected automatically may include usage details, IP addresses and information collected through cookies, web beacons and other tracking technologies.

## The Information We Collect On Or Through Our Website May Include

- Information that You provide by filling in forms on Our Website. This includes information provided at the time of subscribing to Our newsletter, subscribing to Our service, or requesting further services.
- Records and copies of Your correspondence (including email addresses), if You contact Us.
- Details of transactions You carry out through Our Website. Details of Website searches and button clicks are also recorded.

## Information We Collect Through Automatic Data Collection Technologies

As You navigate through and interact with Our Website, We may use automatic data collection technologies to collect certain information about Your equipment, browsing actions and patterns, including:

- Anonymised (hashed) IP address
- Anonymous identifiers such as the ID for Advertising for iOS, Google Advertising ID or similar identifiers
- Website page visits (URLs), and usage
- Interactions with user interface elements of web pages
- Dates and times of interactions
- Geolocation (Latitude / Longitude)
- Browser and device identifiers (User agent, OS, language, screen resolution, input devices, GPU capabilities, advertising identifiers cookies)

The information We collect automatically is statistical data and may include personal information, or We may maintain it or associate it with personal information We collect in other ways. It helps Us to improve Our Website and to deliver a better and more personalised service, including by enabling Us to:

- Estimate Our audience size and usage patterns.
- Store information about Your preferences, allowing Us to customise Our Website according to Your individual interests.
- Speed up Your searches.
- Recognise You when You return to Our Website.

## The Technologies We Use For This Automatic Data Collection May Include

- Cookies (or browser cookies). A cookie is a small file placed on the hard drive of Your computer. You may refuse to accept
  browser Cookies by activating the appropriate setting on Your browser. However, if You select this setting You may be unable
  to access certain parts of Our Website. Unless You have adjusted Your browser setting so that it will refuse cookies, Our
  system will issue cookies when You direct Your browser to Our Website.
- Web Beacons. Pages of Our Website and Our emails may contain small electronic files known as web beacons (also referred
  to as clear gifs. pixel tags and single-pixel gifs) that permit Us, for example, to count Users who have visited those pages or
  opened an email and for other related website statistics (for example, recording the popularity of certain website content and
  verifying system and server integrity).

## Third-Party Use Of Cookies And Other Tracking Technologies

Some third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about You when You use Our website. The information they collect may be associated with Your personal information or they may collect information, including personal information, about Your online activities over time and across different websites and other online services. They may use this information to provide You with interest-based (behavioural) advertising or other targeted content. We do

not control these third parties' tracking technologies or how they may be used. If You have any questions about an advertisement or other targeted content, You should contact the responsible provider directly.

### **Opting-Out**

Our partners may use non-cookie technologies that may not be impacted by browser settings that block cookies. Your browser may not permit you to block such technologies. For this reason you can use the following third party tools to decline the collection and use of information for the purpose of serving you interest based advertising:

- The NIA's opt-out platform
- The EDAA's opt-out platform
- The DAA's opt-out platform

### **Disclosure Of Your Information**

We may disclose aggregated information about Our Users, and information that does not identify any individual, without restriction. We may disclose personal information that We collect or You provide as described in this privacy policy:

- To contractors, service providers and other third parties We use to support Our business.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganisation, dissolution or other sale or transfer of some or all of the firm's assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal information held by Us about Our Website Users is among the assets transferred.
- To fulfil the purpose for which You provide it.
- For any other purpose disclosed by Us when You provide the information.
- With Your consent.

#### **How We Use Your Information**

We use information that We collect about You or that You provide to Us, including any personal information:

- To present Our Website and its contents to You.
- To provide You with information, products or services that You request from Us.
- To fulfil any other purpose for which You provide it.
- To carry out Our obligations and enforce Our rights arising from any contracts entered into between You and Us.
- To notify You about changes to Our Website or any products or services We offer or provide through it and to help Us
  understand how the Website is being used.
- In any other way, We may describe when You provide the information.
- For any other purpose with Your consent.
- To enable third parties to carry out technical, logistical or other functions on Our behalf

We may also use Your information to contact You about goods and services that may be of interest to You. If You do not want Us to use Your information in this way, You may elect to unsubscribe and We will cease using Your information in that manner.

### We May Also Disclose Your Personal Information

- To comply with any court order, law or legal process, including to respond to any government or regulatory request.
- To enforce or apply Our terms of service: https://claimingmadeeasy.com/pages/terms-of-service
- and other agreements, including for billing and collection purposes.
  - o If We believe disclosure is necessary or appropriate to protect the rights, property, or safety of the firm or others.

## **Choices About How We Use And Disclose Your Information**

We strive to provide You with choices regarding the personal information You provide to Us. We have created mechanisms to provide You with the following control over Your information:

- Tracking Technologies and Advertising. You can set Your browser to refuse all or some browser cookies or to alert You when
  cookies are being sent. If You disable or refuse cookies, please note that some parts of this Website may then be inaccessible
  or not function properly.
- Opt-out. You may "opt-out" of receiving marketing or promotional emails from Us by following the instructions in those emails.
   If You opt-out, We may still send You non-promotional emails, such as emails about Your accounts or Our ongoing business relations
- We do not control third parties' collection or use of Your information to serve interest-based advertising. However, these third parties may provide You with ways to choose not to have Your information collected or used in this way.

# **Data Security**

We have implemented measures designed to secure Your personal information from accidental loss and from unauthorised access, use, alteration and disclosure. All information You provide to Us is stored on secure servers behind firewalls. All transactions, regardless of their nature, are encrypted using SSL technology.

## Statistical Analysis - Tracking

We use tracking technology on Our website to measure, evaluate and optimise Our website content. To protect Our Users and partners, We can also identify and defend Ourselves against fraud and security risks. The legal basis for this data processing is Our legitimate interest.

#### **Nextroll Inc**

We use Nextroll, a ad retargeting platform by Nextroll, Inc. 2300 Harrison St 2nd Fl San Francisco, CA 94110 United States. Our site uses technologies of NextRoll to help us recognize your device and understand how you use our site(s) so that we can improve our services to reflect your interests and serve you advertisements about the services that are likely to be of more interest to you. Specifically, NextRoll collects information about your activity on our site(s) to enable us to:

- measure and analyze traffic and browsing activity on our site(s);
- show advertisements for our products and/or services to you on third-party sites;
- measure and analyze the performance of our advertising campaigns;

Your information is being used for our own marketing purposes. Our advertising Partner, NextRoll, Inc., performs a hash of your email address in order to serve targeted advertising to other devices connected to you (via cross-device tracking). By submitting our form, you acknowledge NextRoll, Inc.'s hashing and cross-device activity. For more information, please see NextRoll's Privacy Policy.

#### **Google Analytics**

We use Google Analytics, a web analysis service by Google Ireland Ltd, Gordon House, Barrow Street, Dublin 4 Ireland ("Google"). The protection of Your data is important to Us, therefore We have configured Google Analytics to use the configuration parameter "anonymizelp". By this, Your IP address will be shortened and never processed fully. We, therefore, process Your personal usage data anonymously in Google Analytics. All other data will only be processed pseudonymised. It is not possible for Us to draw any conclusions about Your identity.

For more information on how Google protects Your privacy, please see the information at: https://www.google.de/intl/en/policies/

### **Google Adwords**

We as a Google AdWords customer also use Google Conversion Tracking, a web analytics service provided by Google, Inc. ("Google"). Google AdWords places a cookie in Your browser ("Conversion Cookie") if You have accessed Our website via a Google ad. These cookies are valid for 30 days. If You access some of Our sites and the cookie is still valid, We and Google can recognise that somebody has clicked on the ad and thereafter was transferred to Our website. Every AdWords customer uses a different cookie, and therefore it is not possible to track cookies via the websites of AdWords customers. The information obtained via the Conversion Cookie is used in order to assemble conversion reports for AdWords customers. The AdWords customers receive the number of Users that have clicked on their ad and have been transferred to a site that includes the Conversion Tracking Tag but they do not receive any information that would allow them to identify the User. You may refuse the use of cookies by selecting the appropriate settings on Your browser, however please note that if You do this You may not be able to use the full functionality of this website.

### Zendesk - Conversational Tool

We use "Zendesk Chat", which is a conversational tool by Zendesk Inc., Inc., 1019 Market St, San Francisco, CA 94103. ("Zendesk Inc"), supports compliance with EU data protection requirements, including those set out in the General Data Protection Regulation ("GDPR"), which replaced the EU Data Protection Directive (also known as "Directive 95/46/EC") and became enforceable on May 25, 2018. Zendesk Inc is helping Us to communicate with Our customers with live chats. If You provide personal data in the chat, We will only process them to respond to Your request. Zendesk Inc processes Your voluntary data on Our behalf. You can withdraw the data processing at any time with effect for the future.

## Newsletter

You can use Our website to subscribe to different email notification services. If You provide information about Yourself on the registration form, this information will only be processed based on Your consent. You can revoke Your consent at any time with effect for the future.

## **Facebook Social Plugins**

This website uses social plugins ("plugins") from the social network facebook.com which is operated by Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA ("Facebook"). The plugins are identified by one of the Facebook logos or the amendment "Facebook social plugin". The list and the look of the Facebook social plugins can be viewed here: https://developers.facebook.com/docs/plugins/

If You access a page on Our website that includes such a social plugin, Your browser sets up a direct connection to the Facebook servers. Facebook transfers the social plugin's content directly to Your browser which will then integrate it into the website. Therefore We have no influence on the extent of the data that Facebook collects via its social plugins, and thus, can only inform You based on Our state of knowledge: Through the integration of the plugin, Facebook obtains the information that You have accessed the respective page on Our website, even if You are not a registered User of Facebook or are not logged into Facebook. This information as well as Your browser's IP address is transferred to Facebook's server in the United States and is being stored there. According to Facebook, only anonymised IP addresses are stored from non-registered Users in Germany. If You are logged in to Facebook, Facebook can allocate the visit to Our website to Your Facebook account. Facebook receives such information irrespective of whether You interact with the social plugins or not. If You do interact with the social plugins, e.g. by using the "Like-it-Button" or by posting a commentary, Your browser will transfer such information directly to Facebook where it is being stored. Such information will also be published on Facebook and be displayed to Your Facebook friends. For information on the purpose and extent of data collection, the further processing and use of such data by Facebook, as well as Your rights in this regard and Your setting options for the protection of Your privacy, please refer to Facebook's privacy policy:

https://www.facebook.com/legal/FB\_Work\_Privacy.

If You are a Facebook member and do not want Facebook to collect data on You via Our website and to combine such data with Your Facebook membership data, You need to log off from Facebook before accessing Our website. Furthermore, You may also block social plugins by downloading and installing add-ons for Your browser.

### **Twitter Plugins**

This website uses social plugins that are provided by Twitter Inc., 1355 Market St, Suite 900, San Francisco, CA 94103, USA, and can be identified by the Twitter logo or e.g. the words "Tweet" or "Twitter". The plugins enable the User, inter alia, to share an article or a page of this website on Twitter. If You access a website that includes this plugin, Your browser sets up a direct connection to Twitter's servers. Twitter transfers the plugin's content directly to Your browser which will then integrate it into the website. Therefore We have no influence on the extent or content of the data that Twitter collects via its plugin, and thus, can only inform You based on Our state of knowledge. According to Our knowledge, log information such as the User's IP address, the URL of the referring website, etc, is transmitted to Twitter. Additional information is available in Twitter's privacy policy: <a href="http://twitter.com/privacy">http://twitter.com/privacy</a>

## **Linkedin Plugins**

This website uses plugins which are provided by LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA ("LinkedIn") which can be identified by the LinkedIn logo of the "Share"-Button. If You access a page on Our website that includes this plugin, Your browser sets up a direct connection to LinkedIn's servers. Thereby LinkedIn receives the information that You and Your IP address have accessed this website. If You click on the LinkedIn "Share" button while You are logged into Your LinkedIn account, You can link the content of this website onto Your LinkedIn-Profile, enabling LinkedIn to allocate the visit to Our website to Your LinkedIn account. We as the website operator do not know the content of the data transferred to LinkedIn or how LinkedIn uses such data. For information on the purpose and extent of data collection, the further processing and use of such data by LinkedIn, as well as Your rights in this regard, and Your settings options for the protection of Your privacy, please refer to LinkedIn's privacy policy: <a href="http://www.linkedin.com/legal/privacy-policy">http://www.linkedin.com/legal/privacy-policy</a>

## **Changes To Our Privacy Policy**

It is Our policy to post any changes We make to Our privacy policy on this page. You are encouraged to periodically review this Privacy Policy to stay informed of updates. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring We have an up-to-date active and deliverable email address for You, and for periodically visiting Our Website and this privacy policy to check for any changes.

### **Further Information / Contact**

If You have any further questions, e.g. about data We have stored about You, please do not hesitate to contact Us. Nafiza Ayoub is Our Data Protection Officer. Contact requests may be sent via email at info@claimingmadeeasy.com or in writing at 20-22 Wenlock Road, London N1 7GU.

# **Data Retention And Deletion**

ClaimingMadeEasy will retain Your personal data as long as You continue to use the Website or as required by applicable laws or regulations. We will review Your personal data periodically to establish whether We are still entitled to process it. If We decide that We are not entitled to do so, We will stop processing Your personal data but may choose to retain it in an archived form in order to be able to comply with legal obligations, if any. Under the GDPR, You have full rights:

- to access Your personal data
- to be provided with information about how Your personal data is processed
- to have Your personal data corrected/erased
- to object to or restrict how Your personal data is processed
- to have Your personal data transferred to Yourself or to another person or business under certain circumstances.

Accordingly, You can access, review and update Your personal information as collected by Us; request Us to delete Your account and all associated personal information and/or choose to refuse to share Your personal information as indicated above by using the contact details provided above.