



Vepple - The Personalised Virtual Experience

Privacy Policy

(v03a - 29/01/2024 - 11:00)

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Registered in England & Wales as
Revolution Viewing LTD, trading as Vepple.
Company Reg. No: 5247496
VAT no. 865410230

Introduction

Welcome to the Revolution Viewing privacy and cookie policy.

Revolution Viewing Limited provides website pages and services to its clients who provide these to their website visitors. Revolution Viewing Limited is a data processor for its clients. This privacy policy sets out the basis on which Revolution Viewing Limited's client shall control data provided on the applicable pages. The client's privacy policy should be considered to confirm the basis on which it uses data.

[CLIENT] respects your privacy and is committed to protecting your personal data. This policy will inform you as to how we look after your personal data when you visit our Revolution Viewing pages (regardless of where you visit it from) and will inform you about cookies and tell you about your privacy rights and how the law protects you.

Please also use the Glossary to understand the meaning of some of the terms used in this policy.

1. Important information and who we are

Purpose of this policy

This policy, together with our terms and conditions, aims to give you information on how we collect and process your personal data through your use of our Revolution Viewing pages, including any data you may provide through them when you sign up or subscribe. It will also inform you what cookies are and why they are used.

It is important that you read this policy together with any other policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This policy supplements other notices and privacy policies and is not intended to override them, and applies to your use of our website.

Please read the following carefully to understand how we will use and treat your personal data.

Controller

[CLIENT] is the controller and responsible for your personal data (collectively referred to as "we", "us" or "our" in this policy).

The controller has appointed a data privacy manager/data protection officer who is responsible for overseeing questions in relation to this policy. If you have any questions about this policy, including any requests to exercise [your legal rights](#), please contact the data privacy manager/data protection officer using the details set out below.

Contact details

If you have any questions about this policy or our privacy practices, please get in touch with us in the following ways:

Email address: [EMAIL @ ADDRESS.DOMAIN]

Postal address: [Client Post Address]

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would appreciate the chance

to deal with your concerns before you approach the ICO, so please contact us in the first instance if there is an issue which we can help you with about our use of your personal data.

Changes to the policy and your duty to inform us of changes

We keep our policy under regular review. This version was last updated on **DATE**. It may change, and if it does, these changes will be posted on this page and, where appropriate, notified to you in other ways, including via a push notification or when you next start our app. Any new policy may be displayed on-screen, and you may be required to read and accept any changes to continue your use of the site.

It is important that the personal data we hold about you is accurate and current. Where you are able to update the information we hold, please ensure it is correct. If there is any data that is not correct and you cannot update it, please confirm this with the data controller.

Third-party links

This website may include links to third-party websites, platforms, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites, platforms, plug-ins and applications and are not responsible for their privacy and cookie statements. When you leave our website, we encourage you to read the privacy and cookie policies of every website, platform, plug-in or application you visit before you submit any personal data to them.

2. The data we collect about you

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

We may collect, use, store and transfer different kinds of personal data about you, which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Education Data** includes your qualifications and the courses you are interested in.
- **Contact Data** includes address, email address and telephone numbers.
- **Technical Data** includes (but is not limited to) internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, meeting content (e.g. audio and video), and other technology on the devices you use to access our website and our app, the type of mobile device you use, a unique device identifier (for example, your Device's IMEI number, the MAC address of its wireless network interface or its mobile phone number), mobile network information, your mobile operating system, the type of mobile browser you use or time zone settings.
- **Profile Data** includes your username and password, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website and our services, including, but not limited to, traffic and other communication data, whether this is required for our own purposes or otherwise and the resources that you access.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

- **Location Data** includes your current location disclosed by GPS or other technology.

We also collect, use, and share **Aggregate Data**, such as statistical or demographic data, for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data, which will be used in accordance with this policy.

We do not collect any other **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 and genetic and biometric data). Nor do we collect any information about criminal convictions and offences. We also do not collect data about your health, medical history or any medical condition, and you must ensure any activities are appropriate for you.

In order to provide our services, such as recommending classes you may enjoy, we may read and/or write data to your device. We will not use this information for marketing or advertising purposes or share it with third parties. We may record your use of the site to help us assist you in the future if you wish to progress any applications, contracts or queries with the data controller.

3. How is your personal data collected?

We use different methods to collect data from and about you, including through:

- **Direct interactions.** You may give us your Identity, Educational and Contact Data by filling in forms or by corresponding with us by post, phone, email or otherwise.
- **Automated technologies or interactions.** As you interact with our website and/or our app, we will automatically collect Technical Data about your Device, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.
- **Location Data.** We may use GPS or other technology to determine your current location if we introduce new features into our app. Some of these services may require your personal data to be able to work. If you wish to use them, you will be asked to consent to your personal data being used for this purpose and can withdraw your consent at any time by disabling Location Data in your Device's settings.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:

Technical Data from the following parties:

- (a) analytics providers such as Google based outside the EU;
- (b) advertising networks; and
- (c) search information providers.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

- Where you have consented to our doing so.

Please see below to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data, although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Please note that we may process your personal data for more than one lawful ground, depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of personal data	Lawful basis for processing, including basis of legitimate interest
To access the site and register you as a new user	• Identity • Contact • Technical	Performance of a contract with you
To manage our relationship with you, which will include: (a) Delivering content and our services to you (b) Notifying you about changes to our app, services, terms or privacy and cookie policy (c) Asking you to leave a review	• Identity • Contact • Profile • Marketing and Communications	(a) Performance of a contract with you (c) Necessary to comply with a legal obligation (d) Necessary for our legitimate interests (to keep our records updated and to study how users use our products/services)
To enable you to partake in a prize draw or competition or complete a survey	• Identity • Contact • Device • Profile • Marketing and Communications	(a) Performance of a contract with you (c) Necessary for our legitimate interests (to study how users use our products/services, to develop them and grow our business)
To administer and protect our business, our website and our app (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	• Identity • Contact • Device	(a) 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) (b) Necessary to comply with a legal obligation

To deliver relevant content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	• Identity • Contact • Device • Content • Profile • Usage • Marketing and Communications • Location	(a) Necessary for our legitimate interests (to study how users use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, app, products/services, marketing, user relationships and experiences	• Identity • Contact • Device • Content • Profile • Usage • Marketing and Communications • Location	Necessary for our legitimate interests (to define types of users for our products and services, to keep our website and/or our app updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you		Necessary for our legitimate interests (to develop our products/services and grow our business)

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view of what we think you may want or need or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or have consented to marketing and you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, product/service experience or other transactions.

Cookies

Our website and app use cookies to distinguish you from other users. This helps us to provide you with a good experience when you browse our website and use our app and also allows us to improve our site.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our website and app. They include, for example, cookies that enable you to log into secure areas of our website and app.
- **Analytical or performance cookies.** These allow us to recognise and count the number of visitors and to see how visitors move around our website and app when they are using it. This helps us to improve the way our website and app work, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to our website and app. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Targeting cookies.** These cookies record your visit to our website and app, the pages you have visited and the links you have followed. We will use this information to make our website, our app and the advertising displayed on or through them more relevant to your interests.

Cookie Breakdown

Name	Service	Description	Duration
vepple_cookie_preferences_1	Vepple	Used to determine cookie consent status.	6 months
vepple_filter_selection	Vepple	Used to store current applied filters.	Session
_ga	Google Analytics	Used to distinguish users.	2 years
ga*	Google Analytics	Used to persist session state.	2 years
_gat	Google Analytics	To read and filter requests from bots.	1 minute
_ceir, is_returning	Crazy Egg	Track whether a visitor has visited the site before.	1 year
_CEFT	Crazy Egg	Store page variants assigned to visitors for A/B performance testing.	1 year
_cer.s	Crazy Egg	Track a recording visitor session unique ID, tracking host and start time.	Recording session (expires when the browser is shut down)

_cer.v	Crazy Egg	Track whether a visitor has visited the site before.	Up to 31 days (expires on the first of the month)
_ce.s	Crazy Egg	Track a recording visitor session unique ID, tracking host and start time.	1 year
_ce.cch	Crazy Egg	Used to check if cookies can be added.	1 second
_ce.gtld	Crazy Egg	Used to identify the top-level domain.	1 second
ce_need_secure_cookie	Crazy Egg	Used to determine cookie security parameters.	1 second
ce_successful_csp_check	Crazy Egg	Used to determine if the page has a Content Security Policy rule that would prevent tracking.	24 hours
cebs	Crazy Egg	Used to track the current user session internally.	Session
cebsp	Crazy Egg	Used to determine if a survey should be shown.	Session (auto-deletes when you quit your browser)
_ce.clock_event	Crazy Egg	Prevent repeated requests to the Clock API (see below).	1 Day
_ce.clock_data	Crazy Egg	Store the difference in time between the server's time and the current browser.	1 Day

You can set your Device to refuse all or some browser cookies or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

Change of purpose

We will only use your personal data for the purposes for which we collected it unless we reasonably consider that we need to use it for another reason, and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you, and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table above.

- Internal Third Parties as set out in the [Glossary](#).
- External Third Parties as set out in the [Glossary](#).
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this policy.

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.

6. Deleting your personal data

If at any time you'd like us to delete all personal data that we hold on you, you can do so by clicking "Forget Me" in the "My Profile" section of the site.

7. International Transfers

We do not transfer your personal data outside the European Economic Area.

8. Data 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. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

All personal data which you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password that enables you to access certain parts of our website or App, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Once we have received your information, we will use strict procedures and security features to try to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way.

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.

9. Data retention

How long will you use my personal data?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation with respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve

those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

We may keep basic information about our users (including Contact, Identity, Financial and Transaction Data) for up to six years after they cease being users.

In some circumstances, you can ask us to delete your data: see [your legal rights](#) below for further information.

In some circumstances, we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

In the event that you do not use our App for a period of more than 12 months, then we may treat the account as expired, and your personal data may be deleted.

10. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

You have the right to:

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

Request correction of the personal data that we hold about you.

Request the erasure of your personal data. Please see the section 'Deleting your personal data', if you would like to remove your data by yourself.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party), and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling, legitimate grounds to process your information, which overrides your rights and freedoms.

Request restriction of processing of your personal data.

Request the transfer of your personal data to you or to a third party.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of those rights, please contact us.

No fee is usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

11. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Complying with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

THIRD PARTIES

Internal Third Parties

Other companies in the data controllers group.

External Third Parties

- Service providers who provide IT and system administration services (including Revolution Viewing Limited).
- Professional advisers include lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances.
- Marketing and advertising agencies who provide advice with our marketing and advertising.