

## The Smart Rebel Privacy Policy

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### 1. Who's This Policy For And What Does It Cover?

The Smart Rebel (we) respects your privacy and is committed to protecting it. This Privacy Policy ("Policy") is for our individual clients and other users of our public website, [www.thesmartrebel.com](http://www.thesmartrebel.com) (the "Site" or "Service"). The Policy describes how we may collect, use, and share your Personal Information. It also explains related rights and choices you may have. Rights described in this Policy may not apply if you are interacting with us on behalf of an organization that is our client.

You may see other privacy notices when we collect your Personal Information for certain purposes. Those notices supplement this Policy.

By using the Service, you consent to the practices described in this Policy.

### 2. What is "Personal Information"?

When we say "Personal Information," we mean information that can reasonably be linked to a particular individual or their household, as defined in laws that may apply to you. Generally speaking, your Personal Information includes your unique identifiers (full name, phone number, email address, user name, etc.), and information about your characteristics, conditions or behavior that is associated with one of your identifiers or could otherwise reasonably be linked to you.

"Non-Personal Information," on the other hand, has been anonymized, aggregated or de-identified such that it cannot reasonably be linked to a particular individual or their household.

### 3. Personal Information We Collect And How We Collect It

#### Categories

The categories of Personal Information that we may collect include:

- **Identifiers**, such as first and last name, address, email address, phone number, user name, signature, IP address, cookie ID and similar information.
- **Financial information**, such as payment card information, which is processed by a trusted vendor and not stored by us.
- **Commercial information**, such as products or services purchased, obtained or considered, or information about how you use our Service.
- **Professional or employment information**, such as job title and business or employer name.

- **Device or browser information**, such as device or browser type and configuration
- **Internet activity and Service interactions**, such the website address you visited before navigating to our Site, which pages you visit on the Site, and how you interact with links or content on the Site or emails sent on our behalf.
- **User content**, such as information you enter into a form on our website or the content of your email communications with us.
- **Testimonials**, such as personal testimonials of satisfied Customers and users on the Services in addition to other endorsements, which may include a photo or video of you if you provide one. With your consent, we may post your testimonial along with your name, on the Services. If you wish to update or delete your testimonial, you can contact us at [privacy@elainaray.com](mailto:privacy@elainaray.com).

## Collection Sources

**From You When You Provide It.** We may collect Personal Information from you directly when you fill out a form on the Service; subscribe to receive emails; or otherwise communicate with us.

**Automatically From Your Device.** Like most online services, our Site may passively collect some information from users' devices in order to make features function correctly, customize the user experience, understand how the Service is being used, measure the effectiveness of marketing efforts, or deliver personalized advertising or content. Some of this data may be collected through the use of browser cookies or similar online tracking technologies, which are explained below. In some cases, we limit this type of collection to Non-Personal Information. However, this data may include Personal Information such as online Identifiers and Internet Activity in some circumstances.

**From Third Party Sources.** We may obtain information about you from other third party sources. For example, we may collect identifiers, professional or employment Information, or internet activity that you have chosen to disclose on social media platforms.

We may combine information collected from other sources with information collected from you or your device. To the extent the information, alone or in combination, constitutes Personal Information, we will treat it as Personal Information as described in this Policy.

## 4.How We Use Personal Information

We use Personal Information for the following purposes:

- To present our Service and analyze how it is used;
- To secure our Service against fraud, malicious activity, or conduct that may violate our terms of use;
- To personalize and improve your experience with the Service;
- To process payments for our services;
- To provide you with information, products, or services that you request from us;
- To notify you about changes to our Service;
- To allow you to participate in interactive features on the Service;
- To provide you with periodic newsletters and offers;
- To contact you and provide you with help if you have a customer service issues;
- To contact you to fill out surveys and participate in other types of market research;
- To notify you of new products or services we think you might be interested in;
- To comply with our legal obligations;
- In any other way we may describe when we collect the information; and
- For any other purpose with your consent.

We may use Non-Personal Information for any purpose.

## 5.How We Share Personal Information

### Vendors

We may share Personal Information with contractors, service providers, and other vendors who assist or support us in providing the Services. Examples of these third party services may include hosting our site, storing data, performing analytics, processing payments, or sending marketing communications. Our agreements with vendors prohibit them from retaining, using or disclosing the Personal Information we share with them for any purpose other than providing services to us.

### **Analytics, Social Media and Advertising Partners**

We may share your Personal Information with analytics providers, advertising networks, or social media companies to measure performance of our Service or marketing efforts, offer social media features, or deliver interest-based advertising. This sharing may involve the use of browser cookies and similar technologies placed through our Service by our partners, as explained here. For example, when you visit our Site, our partner's Cookie may cause your browser to automatically send a request to our partner's server and provide our partner with your IP address, other Identifiers, Device Information and Internet Activity.

### **Mandatory Disclosures And Legal Proceedings**

We may have a legal obligation to disclose Personal Information to government authorities or other third parties pursuant to a valid regulatory request, subpoena or court order. We may also need to disclose and otherwise process your Personal Information in accordance with applicable law to prevent physical harm or financial loss, protect the vital interests of a person, enforce our various policies or terms of use, protect our property, services and legal rights, prevent fraud, support auditing, compliance and corporate governance functions, or comply with applicable law.

### **Change In Control Or Merger**

We may transfer your information in the event of the sale of substantially all of the assets of our business to a third-party or in the event of a corporate merger, consolidation, acquisition or reorganization. However, in such event, any acquirer will be subject to the provisions of our commitments to you or we will not disclose your information.

### **With Your Direction Or Consent**

We will share your Personal Information with other third parties as you may direct or otherwise consent.

## **6.Children's Privacy**

Our Services are not directed to children under the age of 16. We do not knowingly collect, maintain, or process children's Personal Information unless the child's parent or guardian consents and provides the information. If we determine that we have received a child's Personal Information from a source other than the child's consenting parent/guardian, we will immediately delete the information.

## **7.Cookies And Online Tracking**

### **What Are Cookies?**

A browser cookie is a small piece of data that a website stores in your device's browser. It holds information that the site uses to function properly, remember your preferences, or personalize your experience. A typical cookie contains a cookie ID, which is a unique string of characters used to identify your browser during the browsing session, or in some cases, during subsequent browsing sessions. Cookies, cookie ID's and similar pieces of data may be considered Personal Information (Identifiers or Internet Activity) under applicable law.

Other online technologies, similar to cookies, may allow users to be identified and tracked across multiple browsing sessions, and in some cases tracked across different websites and online services for marketing or advertising purposes. These technologies include, but are not necessarily limited to, pixels, web beacons and scripts (collectively with browser cookies, “Cookies”).

## **How Cookies May Be Used On Our Services**

Our Service uses “first party” Cookies, which are set by our web domain (elainaray.com). Our Service also uses some “third party” Cookies, which are set by other web domains associated with our vendors or partners. This means that, when you visit our site, your browser may automatically connect to our partner’s web server, as well as ours, and provide our partner with access to your online identifiers and information about how you use our Site.

Cookies are used on our Service for the following purposes:

- **Essential:** Essential Cookies are necessary for site security and to enable you to move around our site and use its features.
- **Preferences.** Preference Cookies allow us to remember your preferences and personalize the Service during a browsing session or across browsing sessions.
- **Analytics:** Analytics Cookies allow us to analyze use of our Site to evaluate and improve performance.
- **Marketing:** Also known as “Targeting” Cookies, these may be used to display ads or other content based on your interests, and may be used by our partners to track your activity across different online services.

## **How You Can Block Cookies**

You can block, disable or delete cookies at any time by changing the settings in your browser. However, blocking, disabling, or deleting cookies may limit your ability to view all the pages of our Site or other sites. You can find more information about cookies and other options you may have for restricting them at [www.cookiesandyou.com/](http://www.cookiesandyou.com/), and [www.aboutads.info/choices](http://www.aboutads.info/choices).

## **“Do Not Track” Signals**

Your browser may offer a Do Not Track (DNT) setting. If you turn that setting on, your browser sends a signal to websites indicating that you don’t want to be tracked over time or across third party sites. We don’t currently respond to these signals because there is not yet a common understanding of how to process them or a consensus on what “tracking” means.

## **8.Your Rights And Choices**

### **Opt-Out Of Marketing Communications**

You may opt-out of our marketing emails by using the unsubscribe link provided in the email.

### **Your Browser And Device Settings**

See Section 7 for options to restrict Cookies.

## **9.Links To Third Party Sites**

Our Site may contain links to third-party websites, products or services. If you use these links, you will leave our site. Such links do not constitute or imply an endorsement, sponsorship or recommendation by us of the third party, the third-party website or the information contained therein, and we shall not be responsible or liable for your use thereof. Such use shall be subject to the terms of use and privacy policies applicable to those sites.

## **10.Third Party Direct Marketing**

We don't share Personal Information with third parties for their direct marketing purposes.

## **11.Security**

The security of your Personal Information is important to us, but remember that no method of transmission over the Internet, or method of electronic storage, is 100% secure. While we strive to use commercially reasonable means to protect your Personal Information, we cannot guarantee its absolute security.

## **12.Data Subjects In The EEA , United Kingdom and Switzerland**

### **Data Controller**

Personal Information that we collect regarding individuals who reside in a member state of the European Economic Area ("EEA"), the United Kingdom or Switzerland is controlled by The Smart Rebel, a company registered in the Netherlands.

### **Lawful bases for processing**

We may process your Personal Information for the purposes described **above** if at least one of the following grounds for processing applies:

- Processing is necessary for us to perform a contract with you or to take steps at your request prior to entering into a contract;
- Processing is necessary to comply with our legal obligations;
- Processing fulfills our legitimate interests in a manner that does not outweigh your rights and freedoms. Our legitimate interests include: protecting our Services against malicious intrusions and unauthorized use; maintaining and improving our Services; understanding how our Services are used; personalizing our Services; promoting our Services effectively; and complying with legal obligations and protecting our legal rights;
- Processing is necessary to protect the vital interests of you or another individual; or
- You have consented to the processing.

### **Automated decision making**

We do not make any decisions involving the use of algorithms or profiling that significantly affects you.

### **Your rights under GDPR**

The GDPR provides you with the following rights, which you can exercise by contacting us at [simone@thesmartrebel.com](mailto:simone@thesmartrebel.com).

- The right to request access to and rectification of your personal information. You may obtain additional information about our processing and a copy of your stored information. You also have the right to request that we update your information if it is inaccurate or incomplete.
- The right to request erasure of your personal information. You may request for us to erase your information from our systems if it is no longer necessary for the reason we collected it, or you withdraw consent and no other legal basis for processing exists.
- The right to restrict our processing of your personal information. You have the right to restrict our processing if: (1) you disagree with the accuracy of your information; (2) our processing is deemed unlawful and you do not want us to erase your information; or (3) we no longer need your information for the purposes for which we collected it but we must store it to comply with our legal obligations.
- The right to data portability. You may receive and transmit your personal information to another controller where our processing is based on consent you gave us and was carried out by automated means.
- The right to object. You have the right to object to our processing of your personal information where we process it because of a legitimate interest.

### **13.Changes To This Policy**

This Privacy Policy is effective as of \_\_\_\_\_ and will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on this page. We reserve the right to update or change our Privacy Policy at any time and you should check this Privacy Policy periodically. Your continued use of the Service after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy. If we make any material changes to this Privacy Policy, we will notify you either through the email address you have provided us, or by placing a prominent notice on our website.

### **14.Contact Us**

If you have any questions or concerns about this Policy, please contact us via [simone@thesmartrebel.com](mailto:simone@thesmartrebel.com).