ACUMEN STRATEGIC PARTNERS' PRIVACY POLICY

INTRODUCTION

Acumen Strategic Partners Ltd is a UK network marketing company that operates the website https://www.acumenstrategicpartners.com and provide web and private content (collectively, the "Services"). This Privacy Policy informs you of Acumen Strategic Partners' policies and practices in the collection, use and disclosure of any information relating to you, that identifies you or by which you are identifiable ("Personal Information") through the use of our website, our Services or that you otherwise provide to us. We will not use or share your personal information with anyone except as described in this Privacy Policy. We use your personal information to improve both our website and our Services. By using our website, the Services or by providing personal information, you agree to our collection and use of your personal information in accordance with this Privacy Policy.

WHO MAY USE OUR WEBSITES AND SERVICES?

Although certain areas of our website can be accessed by visitors generally, access to our Services is not provided to the general public. Only persons or entities that are eligible to enter into further Agreement(s) with us (our "Clients") may, with our permission, access market sensitive, non-public areas of our website. All such Clients are private individuals or businesses and only adults may access our Services.

WHAT PERSONAL INFORMATION DO WE COLLECT?

When ordering or registering on our site, you will be asked to enter your name, address, email address, phone number, or other details in order for us to verify and activate your account.



WHEN DO WE COLLECT YOUR INFORMATION?

We collect information from you when you register on our site, place an order, subscribe to a newsletter, respond to a survey, complete an official form or enter information on our website.

HOW DO WE USE YOUR INFORMATION?

We may use the information we collect from you when you register, make a purchase, sign up to a newsletter, respond to a survey or marketing communication, surf the website or use certain other site features in the following ways:

- To personalise your experience and to allow us to deliver the type of content and product offerings in which you are most interested. For example, we will recommend to you how to best use our features and Services;
- To constantly improve our website;
- To allow us to serve you better when responding to your customer service requests;
- To administer a contest, promotion, survey or other site feature;
- To ask for ratings and reviews of services or products;
- To follow up on day-to-day correspondence (including live chat, email or phone inquiries);
- To give advice to you on how to utilise our website or Services to your advantage;
- To send you important announcements;
- To contact you through a third-party chat or email service in order to offer support in the event our day-to-day support channel fails



HOW DO WE PROTECT YOUR INFORMATION?

We do not use vulnerability scanning and/or scanning to PCI standards. An external PCI compliant payment gateway handles all CC transactions. We do not use Malware Scanning. Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems and are required to keep the information confidential. In addition, all sensitive/credit information you supply is encrypted via Secure Socket Layer (SSL) technology. We implement a variety of security measures when a user places an order or submits or accesses their information to maintain the integrity of your personal information. All transactions are processed through a gateway provider and are not stored or processed on our servers.

DO WE USE "COOKIES"?

Yes. Cookies are small files that a website or its service provider transfers to your computer's hard drive through your web browser (if you allow it) that enables the site's or service provider's systems to recognise your browser and capture and remember certain basic information. For instance, we use cookies to help us remember and process items in your shopping cart. They are also used to help us understand your preferences based on previous or current site activity which enables us to provide you with an improved level of service. We also use cookies to help us compile data in the aggregate about site traffic and site interaction so we can offer better site experiences and tools in the future. You can choose for your computer to warn you each time a cookie is being sent or you can choose to turn off all cookies (through your browser settings). If you turn cookies off, some or all the features that our website offers will become unavailable or appear broken.



THIRD-PARTY DISCLOSURE

We will not sell, trade or otherwise transfer to outside parties without limit in time your Personally Identifiable Information. This does not include other parties who assist us in operating our website, facilitating day-to-day business (including solicitors and accountants) or serving our users and business partners (or prospective business partners) involved with acquisition or merger of our commercial assets. All those parties agree to keep this information wholly confidential and in accordance with all laws and industry rules pertaining to personal data protection. We may also release information when its release is appropriate or required to comply with common law, enforce our site policies or protect ours or others' rights, property or safety.

THIRD-PARTY LINKS

Occasionally, at our discretion, we may offer third-party products or services on our websites. These third-party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these partner sites. Nonetheless, we seek to protect the integrity of our site and welcome any feedback regarding third-party sites, products and standards of service.

PAYMENTS

When processing "peer-to-peer payments we, and your fellow Independent Team Partners, offer you a range of payment methods and some payment methods require sensitive data. We only store the information you choose to disclose on your Team Partner "How to Pay Me" page. This basic data (generally the Sort Code and Account Number you wish to be paid into) will be stored securely in order for us to maintain the functionality of your account.



ACCESS TO YOUR PERSONAL INFORMATION

Data subjects have the right to access their data, a right to rectification and a right to blocking their data under certain circumstances. Data subjects also have the right to object to personal data processing and to request the deletion of the collected personal data if their use is unlawful. To exercise these rights send a written request to our support channel.

WE WILL TAKE THE FOLLOWING RESPONSIVE ACTION SHOULD A DATA BREACH OCCUR:

We will notify you via email within 30 business days. We also agree to the Individual Redress Principle which requires that individuals have the right to legally pursue enforceable rights against data collectors and processors who fail to adhere to the law. This principle states not only that the individual carries enforceable rights against data users but also that the individual has recourse to courts or government agencies to investigate and/or prosecute noncompliance by data processors.

DATA PROTECTION ACT 2018 - THE GENERAL DATA PROTECTION REGULATION (GDPR)

You agree that Acumen Strategic Partners Ltd, being the data controller, may retain and process the personal information you provide including information relating to yourself, your address and other details for the purposes of business creation and development, management reporting and communications both manually and / or on a computer database and genealogy database including contact (for support purposes) from your upward Team Partners.