

Privacy Policy

SECURE THE BAG ACADEMY (“us”, “we”, or “our”) operates the website secthebag.com (the “Service”).

This page informs you of our policies regarding the collection, use, and disclosure of personal data when you use our Service and the choices you have associated with that data.

We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms and Conditions.

Your privacy is really important to us and we take it very seriously. Therefore, we ask you to read this Privacy Policy (the "Privacy Policy") carefully as it explains you important information about, among others:

- About Your Consent
- What Information We Collect About You
- About Cookies Files
- How Long We Keep Your Information
- How We Share Your Information, including Categories of Recipients of Personal Data
- Where the Personal Data of Yours Can Be Processed
- About Cookies Files
- Our use of Google Analytics and Google Adwords tools
- About Marketing and Opting out
- About Your Rights
- Whom You Can Complaint To
- About Children
- How to Contact Us

By visiting this Website or using the Services, you accept rules and conditions described in this Policy, which could be changed over time.

Every time, when you visit the Website or use the Services you express your direct consent to us collecting, using and disclosing information provided by you in accordance with the procedure described in this Policy.

YOUR CONSENT

Before we can process your personal data, we will ask you to give your consent for certain processing activities. Please note that if you have earlier expressed your consent you may freely withdraw such consent at any time by emailing email. If you withdraw your consent, and if we do not have another legal ground for processing, then we will cease handling your personal data. Please be advised that in case we need to handle your personal data for the purpose of managing the Website and/or providing our Services, but you argue or do not agree with us handling your personal information, the Website and/or our Services may become not accessible for you.

Definitions

Service. Service means the secthebag.com operated by **SECURE THE BAG ACADEMY**

Personal Data. Personal Data means data about a living individual who can be identified from those data (or from those and other information either in our possession or likely to come into our possession).

Usage Data. Usage Data is data collected automatically either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

Cookies. Cookies are small pieces of data stored on your device (computer or mobile device).

Data Controller. Data Controller means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information are, or are to be, processed.

For the purpose of this Privacy Policy, we are a Data Controller of your Personal Data.

Data Processors (or Service Providers). Data Processor (or Service Provider) means any natural or legal person who processes the data on behalf of the Data Controller.

We may use the services of various Service Providers in order to process your data more effectively.

Data Subject (or User). Data Subject is any living individual who is using our Service and is the subject of Personal Data.

Information Collection And Use

We collect several different types of information for various purposes to provide and improve our Service to you.

Types of Data Collected

Personal Data

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you (“Personal Data”). Personally, identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Address, State, Province, ZIP/Postal code, City
- Cookies and Usage Data

We may use your Personal Data to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in any email we send or by contacting us.

Usage Data

We may also collect information that your browser sends whenever you visit our Service or when you access the Service by or through a mobile device (“Usage Data”).

This Usage Data may include information such as your computer’s Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When you access the Service by or through a mobile device, this Usage Data may include information such as the type of mobile device you use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use, unique device identifiers and other diagnostic data.

Information from Third Parties

We may work with certain third parties (for example, business partners, sub-contractors, payment service providers, analytics providers) and we also may

receive some information about you from them. We do not browse or save your payment card information. Third-party service providers, process your payment card information when you use a payment card to place an Order on our Website. So, we advise you to thoroughly examine the privacy policy of the corresponding payment service provider. However, they may provide us with certain your personal data which may include:

- your payment cardholder name;
- email registered, and
- your address.

Location Data

We may use and store information about your location if you give us permission to do so (“Location Data”). We use this data to provide features of our Service, to improve and customize our Service.

You can enable or disable location services when you use our Service at any time, through your device settings.

Tracking Cookies Data

We use cookies and similar tracking technologies to track the activity on our Service and hold certain information.

Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

Examples of Cookies we use:

- **Session Cookies.** We use Session Cookies to operate our Service.
- **Preference Cookies.** We use Preference Cookies to remember your preferences and various settings.
- **Security Cookies.** We use Security Cookies for security purposes.

WHY WE COLLECT AND PROCESS YOUR PERSONAL DATA

We are extremely serious about your privacy and use your personal information except for legal reasons and in compliance with personal data protection law, for purposes such as:

- to provide you with the Services you request;
- to ensure that our Website content is presented on your device in the most effective way;
- to carry out our obligations arising from any contracts entered into between you and **SECURE THE BAG ACADEMY**
- to manage your account, including processing payments, and providing notifications;
- to keep our Website safe and secure;
- to notify you about changes in our Services;
- to respond to, and handle any comments, queries or complaints addressed by you regarding the Website and our Services, and any similar comments, queries or complaints from other customers;
- to conduct research, statistical and behavioral analysis;
- to contact you for marketing purposes, where applicable;
- to manage our website and for domestic operations, including diagnostic, analysis of data, testing, investigation, survey purposes, and statistical use.
- to make suggestions and recommendations to you and other customers of our site about services that may interest you or them.
- To provide you with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information

We use Personally Identifiable Information for our own internal purposes including contacting you to inform you about updates to our services and providing you with information relating to transactions that you conduct on the **SECURE THE BAG ACADEMY** Platform. We reserve the right to disclose your information as required by law.

We do not rent or sell our Users' Personally Identifiable Information to third parties. We may send you email communications including information that we may think may be of interest to you, and we may provide your email address to third-party partners if we believe their products or promotions may be of

interest to you. You may opt out of receiving marketing emails at any time by modifying the Preferences section of your profile or by clicking on the unsubscribe link in any marketing email you receive from us. In addition, to improve our ability to serve you relevant ads across the Internet for products that will be more interesting to you, we may provide your personal information to our advertising agents that use your information solely for our advertising purposes.

Legal Basis for Processing Personal Data Under General Data Protection Regulation (GDPR)

If you are from the European Economic Area (EEA), **SECURE THE BAG ACADEMY** legal basis for collecting and using the personal information described in this Privacy Policy depends on the Personal Data we collect and the specific context in which we collect it.

SECURE THE BAG ACADEMY may process your Personal Data because:

- We need to perform a contract with you
- You have given us permission to do so
- The processing is in our legitimate interests and it's not overridden by your rights
- For payment processing purposes
- To comply with the law

Retention of Data

SECURE THE BAG ACADEMY will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

SECURE THE BAG ACADEMY will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

HOW WE SHARE YOUR INFORMATION (INCLUDING CATEGORIES OF RECIPIENTS OF PERSONAL DATA)

Your personal data can be shared with other third parties as follows:

- Any of the third parties accomplish some specific actions on our behalf which include the processing of the personal data provided by you. We give those third parties an availability of the personal data of yours only when it is required so.
- Your personal data can be rendered to the external organizations and agencies, which allows to avoid and notice any fraud actions (including but not limited to the fraudulent transactions) or illegal actions.
- Your personal data may be transferred to any third parties in case we have an obligation to reveal and give your personal data for the purpose of observing any juridical responsibility (according to the court order).
- Your personal data can be rendered to the third parties in case you give us your prior affirmative consent. You can provide us with it in the written form or online by means of "click-through" agreements; by accepting the terms related to the disclosure of some specific Services; in oral form while communicating with the Customer Support Representatives of our Website.
- We may disclose your personal data to third-party contractors, service providers and partners who complete transactions or provide us with certain services (for example, payment card processing, billing, customer service, auditing, and marketing). We will ensure they have appropriate measures in place to protect your data.

Transfer Of Data

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside **(country)** and choose to provide information to us, please note that we transfer the data, including Personal Data, to **(country)** and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

SECURE THE BAG ACADEMY will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

Disclosure Of Data

Business Transaction

If **SECURE THE BAG ACADEMY** is involved in a merger, acquisition or asset sale, your Personal Data may be transferred. We will provide notice before your Personal Data is transferred and becomes subject to a different Privacy Policy.

Disclosure for Law Enforcement

Under certain circumstances, **SECURE THE BAG ACADEMY** may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

Legal Requirements

SECURE THE BAG ACADEMY may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of **SECURE THE BAG ACADEMY**
- To prevent or investigate possible wrongdoing in connection with the Service
- To protect the personal safety of users of the Service or the public
- To protect against legal liability

Security Of Data

The security of your data 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 acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

“Do Not Track” Signals

We do not support Do Not Track (“DNT”). Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked. You can enable or disable Do Not Track by visiting the Preferences or Settings page of your web browser.

Your Data Protection Rights Under General Data Protection Regulation (GDPR)

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. **SECURE THE BAG ACADEMY** aims to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

If you wish to be informed what Personal Data we hold about you and if you want it to be removed from our systems, please contact us.

In certain circumstances, you have the following data protection rights:

- The right to access, update or to delete the information we have on you. Whenever made possible, you can access, update or request deletion of your Personal Data directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you.
- The right of rectification. You have the right to have your information rectified if that information is inaccurate or incomplete.
- The right to object. You have the right to object to our processing of your Personal Data.
- The right of restriction. You have the right to request that we restrict the processing of your personal information.
- The right to data portability. You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.
- The right to withdraw consent. You also have the right to withdraw your consent at any time where **SECURE THE BAG ACADEMY** relied on your consent to process your personal information.

Please note that we may ask you to verify your identity before responding to such requests.

You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

MARKETING AND OPTING-OUT

If you previously gave us your consent, we may contact you through electronic messaging services including emails, text messages, and similar services about our Services, promotions and special offers which may be interested to you.

YOU HAVE THE RIGHT AT ANY TIME TO ASK US TO STOP PROCESSING YOUR INFORMATION FOR DIRECT MARKETING PURPOSES.

If you wish to exercise this right, you should contact us by sending an email to email or through the unsubscribe link at the bottom of our marketing emails.

Account deletion

You can always contact us at (your email) to have your **SECURE THE BAG ACADEMY** account removed, along with all data you have produced while on **SECURE THE BAG ACADEMY**, including permanent removal of photos, comments, saved boards, workplace history, and subscription and billing info, booking history, your account information, and settings. These removals will take effect almost immediately (within minutes) on our platforms from the time we run the deletion process. We will initiate the deletion process as soon as possible, at most within 1 business week, but typically immediately after receiving your request.

There might be cached data available for a short time (24 hours) after the completion of the deletion.

We do keep snapshots and backups of our data in case of data loss from network or server breakdowns, and those backups might be brought back online in case of emergency, possibly restoring some user data to the system.

For this scenario, we keep a list of IDs of deleted users and make sure to 're-delete' them in case we need to use old data restored from backup. The deleted ID's are not preferable to any user after the user has been deleted.

After at most 4 weeks, any user data is also permanently gone from all backups.

Service Providers

We may employ third party companies and individuals to facilitate our Service (“Service Providers”), to provide the Service on our behalf, to perform Service-related services or to assist us in analyzing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

Analytics

We may use third-party Service Providers to monitor and analyze the use of our Service.

Google Analytics

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <http://www.google.com/policies/privacy>

Behavioral Remarketing

SECURE THE BAG ACADEMY uses remarketing services to advertise on third party websites to you after you visited our Service. We and our third-party vendors use cookies to inform, optimize and serve ads based on your past visits to our Service.

Google AdWords

Google AdWords remarketing service is provided by Google Inc.

You can opt-out of Google Analytics for Display Advertising and customize the Google Display Network ads by visiting the Google Ads Settings page: <http://www.google.com/settings/ads>

Google also recommends installing the Google Analytics Opt-out Browser Add-on - <https://tools.google.com/dlpage/gaoptout> - for your web browser. Google Analytics Opt-out Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics.

For more information on the privacy practices of Google, please visit the

Google Privacy Terms web page:

<http://www.google.com/intl/en/policies/privacy/>

Payments

We offer a payment system that allows Users to pay with a credit card (the "Payment System"). If you make use of the Payment System, we will collect your credit card number and/or other entered financial institution information and will use that information to bill your membership fee and/or to perform the billing operation on behalf of the Technician, including but not limited to the use and disclosure of such credit card number and information to third parties as necessary to complete such billing operation. That information is provided directly to our third-party payment processors whose use of your personal information is governed by their Privacy Policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, Mastercard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

The payment processors we work with are:

Apple Store In-App Payments.

Their Privacy Policy can be viewed at

<https://www.apple.com/legal/privacy/en-ww/>

Google Play In-App Payments.

Their Privacy Policy can be viewed at

<https://www.google.com/policies/privacy/>

PayPal or Braintree.

Their Privacy Policy can be viewed at

<https://www.paypal.com/webapps/mpp/ua/privacy-full>

(You can include any other means of payment intended to be used on the app and can remove from the ones listed above)

Children's Privacy

Our Service does not address anyone under the age of 18 ("Children"). We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your Children has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

Fair Information Practices

The Fair Information Practices Principles form the backbone of privacy law in the United States and the concepts they include have played a significant role in the development of data protection laws around the globe. Understanding the Fair Information Practice Principles and how they should be implemented is critical to comply with the various privacy laws that protect personal information.

In order to be in line with Fair Information Practices we will take the following responsive action, should a data breach occur:

We will notify you via email

- Within 7 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 requires not only that individuals have enforceable rights against data users, but also that individuals have recourse to courts or government agencies to investigate and/or prosecute non-compliance by data processors.

CAN-SPAM Act

The CAN-SPAM Act is a law that sets the rules for commercial email, establishes requirements for commercial messages, gives recipients the right to have emails stopped from being sent to them, and spells out tough penalties for violations.

We collect your email address in order to:

- Send information, respond to inquiries, and/or other requests or questions

To be in accordance with CAN-SPAM, we agree to the following:

- Include the physical address of our business or site headquarters.

If at any time you would like to unsubscribe from receiving future emails, you can email us at

and we will promptly remove you from ALL correspondence.

Changes To This Privacy Policy

SECURE THE BAG ACADEMY may update or revise this Policy from time to time. You agree that you will review this Policy periodically. If we make any changes to this Policy, we will change the “Last Updated” date above.

You are free to decide whether or not to accept a modified version of this Policy, but accepting this Policy, as modified, is required for you to continue using our Sites. If you do not agree to the terms of this Policy or any modified version of this Policy, your sole recourse is to terminate your use of our mobile application.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

Contact Us

If you have any questions about this Privacy Policy, please contact us:

By email: **(email address)**