

Soap Aid, Inc respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website.

1. IMPORTANT INFORMATION

This privacy notice aims to give you information on how Soap Aid, Inc collects and processes your personal data through your use of this website, including any data you may provide through this website when you donate or register for our services.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice 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.

Soap Aid, Inc is responsible for processing your data and is the controller of your data for when you donate or register for services with us.

CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

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, last name, username or similar identifier and title]
- **Contact Data** includes [billing address, delivery address, email address and telephone numbers]
- **Financial Data** includes [bank account and payment card details]
- **Transaction Data** includes [details about payments to and from you and other details of products and services you purchased from us]
- **Technical Data** includes [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 and other technology on the devices you use to access this website]
- **Profile Data** includes [your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses]
- **Usage Data** includes [information about how you use our website, products and services]
- **Marketing and Communication Data** includes [your preferences in receiving marketing from us and our third parties and your communication preferences]

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does 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 privacy notice.

We **DO NOT** collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data.

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

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, contact and financial data by filling in forms or by corresponding with us by phone, email or otherwise. This includes data you provide when you:
 - Create an account on our website;
 - Subscribe to our services;
 - Request marketing to be sent to you;
- Automated Technologies or Interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our cookie policy for further details
- Third Parties or Publicly Available Sources. We may receive personal data about you from various third parties and public sources.

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 legitimate interest (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 or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you via email. You have the right to withdraw consent to marketing at any time by contacting us at usa.save@soapaid.org.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

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

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.

Purpose/Activity	Type of Data	Lawful Basis for Processing
Customer Information	Identity & Contact	Performance of a contract with you
To process and deliver your order including: <ul style="list-style-type: none"> • Manage payments, fees and charges • Collect and recover money owed to us 	Identity, Contact, Financial, Transaction, Marketing and Communications	Performance of a contract with you and necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: <ul style="list-style-type: none"> • Notifying you about changes to our terms or privacy policy • Asking you to leave a review or take a survey 	Identity, Contact, Profile, Marketing and Communications	Performance of a contract with you, necessity to comply with a legal obligation and necessary for our legitimate interest (to keep our records updated and to study how customers use our products/services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Identity, Contact & Technical	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security and to prevent fraud)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	Technical & Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	Identity, Contact, Technical, Usage & Profile	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.

PROMOTIONAL OFFERS FROM US

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and, in each case, you have not opted out of receiving that marketing.

COOKIES

You can set your browser 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. For more information about the cookies we use, please see our cookie policy.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may need to share your personal data with the parties set out below for the purposes set out in the table above in section 4.

- Internal Third Parties
- External Third Parties
- Thirds 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 privacy notice.

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.

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized 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 your instructions and they are subject to a duty of confidentiality.

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.

8. DATA RETENTION

HOW LONG WILL WE USE YOUR PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfill the purpose we collected it for, including for the purpose of satisfying any legal, accounting, or reporting requirements.

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 unauthorized 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 requirements.