

Create Development Privacy Policy

Create Development Limited ("Create Development", "we", "our" or "us") registered in England and Wales under company number **6476863** is committed to protecting your privacy and takes it very seriously. The sections below make up our privacy policy and explains how Create Development may collect, use, or disclose, information about you.

We assure you that your personal information will be processed in accordance with the **Data Protection Act 2018**, which incorporates the European General Data Protection Regulation (GDPR).

Any changes we make to our privacy policy in the future will be posted on this page.

For the purposes of data protection legislation we are the data controller for your personal data. We are registered with the Information Commissioner's Office in the UK with reference number **Z3294225**.

If you have any concerns or questions about our privacy policy or your personal information, please contact us at info@createdevelopment.co.uk

What information we collect about you:

This section describes how and when we may collect your personal information.

'Personal information' means any information relating to an individual, which can identify them – either directly or indirectly. It can refer, amongst other things, to an identification number, or to one or more specific identifying pieces of information, such as an address or date of birth.

When you do any of these:

- Access real PE platform
- Set up an account on our websites
- Place an order
- Complete a booking form
- Enter any competition, promotion or prize draw
- Upload an image or comment
- Sign up for our newsletter or subscribe to any other services that we offer
- Fill out any forms on our websites
- Correspond with us, whether by phone, email or chat facility
- When you browse our websites

Then, we may collect your personal information, including:

- Name
- Address
- Email address
- Phone/ mobile number
- Technical information about when and how you access and use our platforms, including your IP address browser type and operating system. For further information about the use of your IP address and technical information please see below at our Cookies section.

We might sometimes ask you other details, but any required information is identified by an asterisk. We'll also require your credit or debit card details when you place an order (unless you pay with PayPal).

We do not knowingly collect information from children under 18 years of age.

How we use your information:

We use your information for the following:

- To allow you to access our digital platform
- To allow us to handle your orders, deliver products and process your payments and refunds
- To let you know about your orders

- So we can personalise your shopping experience on our sites
- To update our internal records and generally maintain your account with us for information on the programmes and products you have purchased
- To keep a record of when and why you contact us and to keep your contact details up-to-date
- For statistical, analytical or survey purposes – so we can improve our websites and their services to you
- To prevent or detect fraud or abuses of our sites
- If you consent, to notify you of products or special offers that may be of interest to you
- To process your application when you enter a competition promotion or prize draw.

How to opt out from receiving marketing and newsletters:

If you sign up to our newsletter, or ask us to send it to you, we may keep you informed by post, email, text or other electronic means about our products and special offers that we think you'll like. You have the right to ask us not to process your personal information for marketing purposes, or to change your mind at any time.

You can opt out by:

Choosing not to sign up for our newsletter and other marketing offers when you create your account. You can tell us by using our [Contact Us](#) form (don't forget to give full name and email address).

Unsubscribing from our newsletters by following the link on the newsletter (every newsletter we send you will include a link to allow you to opt out)

We'll try our best to process your request promptly but it may take a few days for your opt-out or unsubscribe request to be changed.

How we protect your information:

Our sites use up-to-date industry procedures to protect your personal information. We also protect the security of your data during transmission using Secure Sockets Layer (SSL) encryption software. We may vary this in the future if we feel you will benefit from greater security whilst using our sites. We have appropriate security measures in place in our physical facilities to protect against the loss, misuse or alteration of information that we have collected from you via our sites.

Disclosure of your information:

We may disclose your personal information to our service providers who operate elements of our service and process data on our behalf. These may include businesses who provide technology services such as hosting for our servers and email distribution, and business partners who provide delivery fulfilment services. Where such disclosures are made, this will be under contractual arrangements with us and carried out in accordance with the requirements of UK data protection laws.

Your personal information may be processed by us or our service providers outside the European Economic Area in countries that don't have the same standards of protection for personal information as the UK. If your personal information is processed outside the European Economic Area we will ensure that your personal information will be adequately protected as required by data protection law.

In addition, we may disclose your personal information to any successors in title to our business or to a buyer in the event that we or any of our assets are acquired by a third party (as your information may be one of the transferring assets).

Create Store:

Our Create Store is hosted on **Shopify Inc** ("Shopify"). They provide us with the online e-commerce platform that allows us to sell our products and services to you. Your data is stored through Shopify's data storage, databases and the general Shopify application. They store your data on a secure server behind a firewall.

If you choose a direct payment gateway to complete your purchase on our store, then Shopify stores your credit card data. It is encrypted through the Payment Card Industry Data Security Standard (PCI-DSS). Your purchase transaction data is stored only as long as is necessary to complete your purchase transaction. After that is complete, your purchase transaction information is deleted.

All direct payment gateways 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 credit card information by our store and its service providers.

For more insight, you may also want to read Shopify's Terms of Service (<https://www.shopify.com/legal/terms>) or Privacy Statement (<https://www.shopify.com/legal/privacy>).

We may carry out fraud and security checks with Shopify and other organisations involved in fraud prevention. If we or they suspect or identify fraud we and/or they may record this and may also pass this information to other organisations for the purpose of fraud prevention. We, Shopify and these other organisations may use this information for fraud prevention purposes in the future.

We will also disclose any of your personal information to any third party where we are under a duty to do so in order to comply with any legal obligation, or in order to enforce or protect any of our rights, property or safety (or those of our customers).

Your rights

Under certain circumstances, by law you have the right to:

- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it.
- You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- 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.
- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it. You can also withdraw your consent, where this is the basis for our processing your data (without affecting the lawfulness of our previous processing based on consent).
- Request the transfer of your personal data to another party.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.

Cookies

Our cookie policy:

The sections below make up our cookies policy. By using our websites, you consent to cookies being used in accordance with this cookies policy. This policy also explains how you can opt out of the use of cookies on our websites.

What cookies are:

Cookies are small files that are downloaded onto your computer, mobile, or other device when you access certain websites. Cookies allow a website to recognise your device. They help your browser to

navigate through the website by allowing you to sign in automatically and by remembering settings you selected during earlier visits (among other functions). Cookies don't harm your computer or device.

Most web browsers automatically accept cookies. Unless you've adjusted your browser settings to refuse cookies, cookies will be sent when you access our websites. Find out how to do this, in our 'How to change your cookie settings' section below.

You can learn more about cookies by visiting allaboutcookies.org.

How we use cookies:

Cookies help us to provide you with a good experience when you browse our websites. They allow you to make full use of our online shopping and personalised features.

We don't use cookies to collect or record information such as your name, address or payment details.

Here's how we use cookies:

- For essential technical reasons – such as keeping track of your current shopping session and enabling you to pay for your products in checkout
- To distinguish you from other website users. This helps us to:
- remember you when you return and to personalise our website to you, such as saving your bag or remembering what you last viewed or searched for.
- Target advertising towards you based on what you like and what you view and search for
- To collect statistical and analytical information about how visitors use our websites – so we can improve the way our sites work and to measure the success of our competitions and campaigns
- To enable us to fulfil our contractual obligations to third parties – for example to pay a partner if you've made a purchase on one of our websites by following a link from their website.

The types of cookies we use:

We use both 'persistent' and 'session' cookies:

- **Persistent cookies** are stored by your browser and on your device until their set expiry date (unless you delete them first)
- **Session cookies** expire as soon as you close your web browser

We use some, or all, the following types of cookies on our sites:

Strictly Necessary Cookies: These are essential cookies. They're used to carry out requests you make when you use our sites – for example, remembering information provided by you, such as the items you've put in your shopping bag. If you choose to opt out of getting these cookies, then won't be able to use our sites properly. You'll still be able to browse, but you won't be able to put anything in your shopping bag or buy it.

Performance Cookies: These cookies allow us to collect data about the way you've used our websites, so we can record information about what you've viewed. We use these cookies to measure if our customers are getting the most from our sites. We then use this information to improve our sites and help us understand how our customers move around them. These cookies may also be provided by a third party analytic tool, but will only be used for purposes related to our websites.

Functionality Cookies: These cookies allow websites to remember choices you've previously made that are specific to you – for example your country selection, language preferences or when you choose to remain signed-in.

Targeting Cookies: These cookies remember information regarding how you've used our websites and other websites, so that we can show you promotional and other targeted information based upon the things you like and what you've searched for and viewed.

Web Beacons: We place small images or 'beacons' on many of the pages on our website and in online advertising with third parties. We use these beacons, in connection with cookies, to collect non-personal data on the usage of our website. This includes (amongst other things) the date and time of your visit, the pages you looked at, the page you came from, the type of browser, the type of operating system and the domain name of your internet service provider (ISP). This information is

collected about thousands of site visits and analysed as a whole and is useful in many ways, including tracking the performance of our online advertising (such as online banner ads) and to determine where to place future advertising on other websites.

Google Analytics Cookies: Our sites use Google Analytics, a web analysis tool provided by Google Inc. ('Google'). Google Analytics uses cookies to track your use of the website. This information (including your IP address) is sent to Google's servers in the USA where it's used to prepare analysis and reports for us on the use and effectiveness of our websites. Google will not associate your IP address with any other data held by them. Visit [Google Support](#) to learn more about Google Analytics, including browser tools to prevent this tracking.

We're constantly developing our site, so the cookies we use may change from time to time. If you'd like a list of the cookies we're currently using, please use our [Contact Us](#) form.

Flash cookies: We may display video content on this website using Adobe Flash Player. Adobe uses Flash cookies to improve your experience. If you want to disable or delete a Flash cookie, please visit Adobe Flash Player global security settings.

Please bear in mind that if you disable Flash cookies you won't be able to access certain content on our website which uses Adobe Flash Player, such as videos.

Social network cookies: If you share Create Development content on social networks, you may be sent cookies from these sites. We don't control the sending of these cookies, so we advise you to check these third-party (social sharing) websites for more information about their cookies and how to manage them.

How to change your cookie settings:

If you're not happy with the way that we use cookies then you could choose to:

- Disable cookies on your computer or device
- Delete Create Development cookies after you've visited one of our sites
- Use your browser's anonymous setting (called 'Incognito' in Chrome, 'InPrivate' for Internet Explorer, 'Private Browsing' in Firefox and Safari)

To disable (or enable) cookies:

You can enable or disable cookies in your website browser settings. How you do this will depend on which browser you're using.

Important! Our sites use cookies for technical functionality. If all cookies are disabled on your computer or device, you'll still be able to browse, but may not be able to open and download all attachments and links.

To learn how to manage cookies using the latest browser versions, you can follow these links:

- [Chrome](#)
- [Internet Explorer](#)
- [Safari](#)
- [Firefox](#)
- [Flash Cookies](#)

For further help, visit allaboutcookies.org

If you have any concerns or questions about our use of cookies or our cookie policy, please [contact us](#).