

## **PRIVACY POLICY**

The Growth Establishment

**BY VISITING [growthestablishment.com](https://growthestablishment.com), YOU ARE CONSENTING TO OUR PRIVACY POLICY.**

### **1. OVERVIEW**

The Growth Establishment (“Company”) is committed to protecting your privacy online. This Privacy Policy describes the personal data we collect through this website at [growthestablishment.com](https://growthestablishment.com) (the “Site”) and what we do with it.

Visitors and any users of the site are referred to as “user”, “you” and “your” and the Company is referred to as “we,” “us,” and “our.” The Company process personal data as a Controller as defined by the European Union’s General Data Protection Regulation (GDPR). Accessing this Site constitutes a use of the Site and an acceptance to our Privacy Policy.

Use of the Site, including all materials presented herein and all online Services provided by Company, is subject to the following Privacy Policy. This Privacy Policy applies to all site visitors, customers and all other users of the Site. By using the Site or Service, you agree to this Privacy Policy, without modification, and acknowledge reading it.

### **2. DATA WE COLLECT AND HOW WE USE IT**

We collect the personal information you voluntarily provide to us, which includes your name and e-mail address, in order to subscribe to our newsletter, receive our content, comment on our blog, and/or purchase services or online products. There is also other personal data we may collect detailed herein.

We collect data from you directly when you fill out a form, purchase a product, or communicate with us via email or social media. We also collect data from you when you use our Website. We may collect personal data from third parties such as our payment

processors, advertising networks, and/or analytics providers. Your data is stored in a secure platform. We use your personal data for processing as outlined below or a reasonably compatible purpose.

- A. *Usage Data.* We may process data about your use of our Website and services. This may include your IP address, browser type, operating system, geographical location, page views, website navigation paths, and frequency and/or pattern of your use of our website. This data is collected through our analytics tracking systems. This data is used to analyze the use of our Website, to deliver relevant content and advertising, and understand our users. The legal basis for processing is our legitimate interest, namely monitoring and improving our website, marketing, and services.
- B. *Customer Data.* We may process user data, such as name, email address, address, telephone, credit-card number, and other relevant data as related to purchases of our products and/or services. We process this data to supply products and/or services to you, as well as to market other relevant goods and services to you. The legal basis for processing is consent and your affirmative action to enter into such contract with us and/or the purchase and delivery of the contract between you and us.
- C. *User Data.* We may process personal information you provide us for the purpose of subscribing to our email notifications, free content, and/or newsletters, as well as communication data that you send to us either through email, social media, or other posting and/or communication methods. We process this data for the purposes of communicating with you, to deliver relevant website content, and for the purposes of sending you marketing, content and/or emails. The legal basis for this process is consent or our legitimate interests, which is to grow our business and keep records which may be needed to pursue or defend a legal action.

### **3. MARKETING AND ADVERTISING.**

The above Data may be used to send you marketing communications about our business or products. The legal basis for this type of processing is either consent or our legitimate

interests in growing our business. We may send you such communications if you requested it and/or if you agreed to receive such communications. You may opt-out of such communications at any time through the 'unsubscribe' button in each email or contacting us at [thegrowthestablishment@yahoo.com](mailto:thegrowthestablishment@yahoo.com).

Any of the above Data may be used to deliver advertisements to you, including Facebook Ads, Instagram, and/or other similar advertisements. We may also use such Data to understand the effectiveness of our advertising. The legal basis for this type of processing is our legitimate interest to grow our business through marketing and advertising.

#### **4. SHARING YOUR PERSONAL DATA**

We do share your information with trusted third parties who provide support in running this Website including any blog or newsletter, as well as those parties and services that help administer our business. Your data will never be shared with unrelated third parties. We may disclose your information to payment service providers, administrative and marketing providers, business advisors, or third parties if we sell or transfer parts of our Company. Third parties we share your data with will keep it secure and respect your privacy under the law and we take steps to ensure the companies we work with also comply with the GDPR.

#### **5. ANTI-SPAM POLICY**

We comply with Anti-Spam laws. If you opt-in to receive our newsletter, marketing, or other communications, the option to unsubscribe will be included in every email. If we sell or transfer any of our business or assets, certain information about our clients may be a part of that sale or transfer. In the event such sale or transfer results in a material change to this Privacy Policy, we will notify you.

#### **6. COOKIES**

We may send cookies, Facebook pixels, and/or other tracking signals to your computer in order to uniquely identify your browser and improve the quality of our service and/or

**Commented [SK1]:** For those in the EU and for EU visitors to your website, you want to include a 'cookies pop-up' that will get consent to your cookies policy. Websites (wordpress, squarespace) have these tools available.

advertising. We use cookies to identify when you visit our website, to store information about your preferences, to personalize the website and/or advertisements you may see, and analyze the use and performance of our website.

The term “cookies” refers to small pieces of information that a website sends to your computer’s hard drive while you are viewing the Site. We may use both session cookies (which expire once you close your browser) and persistent cookies (which stay on your computer until you delete them). You have the ability to accept or decline cookies and tracking signals using your web browser settings. If you choose to disable cookies, some areas of the Website may not work properly or at all. Our Site may not respond to Do Not Track signals sent by your browser.

#### **7. THIRD PARTY LINKS.**

This Site may contain links to third party websites. Unless otherwise stated, this Privacy Policy only covers information that we collect from you on this Site. Any other link will be covered by the privacy policy of that specific site. You acknowledge and accept that we are not responsible for the privacy policies or practices of third parties.

#### **8. DATA SECURITY AND BREACH RESPONSE**

We do our best to protect your information for any unauthorized access, misuse, or disclosure. We may allow access to your personal data to our employees, contractors, and service providers that need to know such data to perform necessary business services. Personal data will be kept confidential and employees and/or contractors will only have access to it when necessary. Secure password managers & platforms will be used to manage data access when possible.

Should there be a potential breach of personal data, we have procedures in place to respond. The breach will be identified, the scope will be determined, and we will make reports and/or notification if we are legally required to do so.

You acknowledge that the personal information you voluntarily share could be accessed or tampered with by a third party. You agree that we are not responsible for any intercepted information shared through our Site without our knowledge or permission. Additionally, you release us from any and all claims arising out of or related to the use of such intercepted information in any unauthorized manner. You agree to notify us for any breach of security or unauthorized use of your information.

#### **9. DATA RETENTION AND DESTRUCTION**

Personal data that we process for any purpose shall not be kept for longer than is necessary to fulfill its collection purpose or to satisfy a legal or accounting purpose. In some cases, your data may be anonymized for research purposes and used indefinitely. If your data no longer meets any of the above criteria, personal data will be deleted or otherwise disposed of in a safe and secure manner.

#### **10. INTERNATIONAL TRANSFERS**

Your data may be transferred to other countries and by using the Website, you consent to the transfer of information to countries outside your country of residence. If you are located in the European Union, we may store and share your personal data with companies located outside of the European Economic Area. We will always do our best to ensure security of your data. We aim to use US-based providers that are part of the EU-US Privacy Shield. You may always request information on how and where your data is processed and stored.

#### **11. CHILDREN'S ONLINE PRIVACY PROTECTION ACT COMPLIANCE**

We do not knowingly collect or solicit data online from or market online to children under the age of 13 in compliance with the Children's Online Privacy Protection Act (COPPA).

#### **12. CHANGES TO THIS POLICY**

You acknowledge and agree that you have reviewed this Privacy Policy and that you will continue to review this Policy to be aware of any modifications. We reserve the right to

update or change our Privacy Policy at any time. 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 this Website.

### **13. YOUR RIGHTS**

Your rights under data protection laws include the right to access, erase, correct, restrict, and/or object to our use and processing of your personal data, as well as the right to portability of the data. You have the right to confirmation as to how and where we process your data. To the extent that the legal basis for our processing consent, you have the right to withdraw at any time. If you consider our processing to infringe data protection laws, you have the right to lodge a complaint with a supervisory authority.

### **14. OUR INFORMATION**

This Website is owned and operated by:

The Growth Establishment

543 North Pugsley Street, SLC, Utah 84103

thegrowthestablishment@yahoo.com

If you have any questions or concerns regarding this Privacy Policy, please email [thegrowthestablishment@yahoo.com](mailto:thegrowthestablishment@yahoo.com).

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