

Privacy Policy for www.vodalmighty.com

This website www.vodalmighty.com (the **Site**) is operated by VOD Media International Limited (**VMIL**). VMIL is committed to protecting and respecting your privacy. We comply with data protection legislation such as the Data Protection Act 1998 (**the Act**). The Act regulates the processing of personal data relating to you and grants you various rights in respect of your personal data.

This policy forms part of our **Terms** and sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read it carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of the Act, the data controller is VOD Media International Limited of Sterling House, 1 Sheepscar Court, Meanwood Road, Leeds, West Yorkshire, LS7 2BB.

1. INFORMATION WE MAY COLLECT AND RETAIN FROM YOU

We may collect and process information that you provide by filling in forms on the Site. This includes information provided at the time of registering to use the Streaming Service, registering to become a Member, posting Member Material or requesting further services and includes, but is not limited to, name, payment and contact details, gender, date of birth, country of residence and any other questions asked in relation to your membership application or use of the Site. We may also ask you for information when you enter a competition or promotion sponsored by VMIL, and when you report a problem with the Site.

If you contact us, we may keep a record of that correspondence.

We may also ask you to complete surveys that we use for research purposes and we may collect and process information that you provide, although you do not have to respond to them.

We may collect and process details of transactions you carry out through the Site and of the fulfilment of your orders.

We may collect and process details of your visits to the Site including, but not limited to, your IP address, browser type, referral source, traffic data, geographical location, weblogs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access.

2. IP ADDRESSES AND COOKIES

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration, to help us improve the Site, research and analysis and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

A cookie is a text-only string of information that a website transfers to the cookie file of your computer's hard drive so that the website can remember who you are.

A cookie will typically contain the name of the domain from which the cookie has come, the "lifetime" of the cookie, and a value, usually a randomly generated unique number.

When you visit the Site we send you a cookie. Cookies may be used to help us recognise you as a unique visitor (just a number) when you return to the Site and to allow us to speed up your searches, tailor content or advertisements to match your preferred interests or to avoid showing you the same adverts repeatedly, and/or to compile anonymous, aggregated statistics that allow us to understand how users use the Site and to help us improve the structure of the Site. We cannot identify you personally in this way.

Two types of cookies may be used on the Site: (i) session cookies, which are temporary cookies that remain in the cookie file of your browser until you leave the Site; and (ii) persistent cookies, which remain in the cookie file of your browser for much longer (though how long will depend on the lifetime of the specific cookie).

You have the ability to accept or decline cookies by modifying the settings in your browser. However, you may not be able to use all the interactive features of the Site if cookies are disabled.

We may use a third party to serve advertisements on the Site. Cookies may be associated with these advertisements to enable the advertiser to track the number of anonymous users responding to the campaign. We do not have access to or control of cookies placed by third parties.

[s part of your application to become a Member, we may make credit searches about you at credit reference agencies. The agencies will record details of any search whether or not your application succeeds. This information may be used by other subscribers for credit decisions. We may use credit scoring methods to assess your application and to verify your identity. Credit searches and other information which is provided to us and/or the credit reference agencies about you and anyone with whom you are linked financially may be used by us if credit decisions are made about you and anyone with whom you are linked financially or other members of your household. This information may be used for debt tracing and the prevention of money laundering as well as the management of our service to you. In addition, we may ask you to provide physical forms of identification and/or we may telephone to confirm your identity. Please contact us if you want to have details of those credit reference agencies from whom we obtain and to whom we pass information about you. You have a legal right to these details.]

We may employ the services of a third party to help us in certain areas, such as website hosting. In some cases the third party may receive your information. However, at all times, we will control and be responsible for the use of your information.

Some of our web pages may contain electronic images known as "web beacons" (sometimes known as clear gifs) that allow us to count users who have visited these

pages. Web beacons collect only limited information including, a cookie number, time and date of a page view, and a description of the page on which the web beacon resides. We may also carry web beacons placed by third party advertisers. These beacons do not carry any personally identifiable information and are only used to track the effectiveness of a particular campaign.

[We use Google Analytics to analyse the use of the Site. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated relating to the Site is used to create reports about the use of the Site. Google will store this information. Google's privacy policy is available at: <http://www.google.com/privacypolicy.html>. **[Note: this was in your draft - will Google Analytics actually be used?]**

3. WHERE WE STORE YOUR PERSONAL DATA

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. Some of these countries may not have equivalent data protection legislation protecting the use of your personal information. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology **[Note: will secure servers and SSL technology be used?]**. Where we have given you (or where you have chosen) a User ID which enables you to access certain parts of the Site, you are responsible for keeping this User ID confidential.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to the Site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

4. USES MADE OF THE INFORMATION

We use information held about you in the following ways:

- to ensure that content from the Site is presented in the most effective manner for you and for your computer;
- to provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes;
- to carry out our obligations arising from any contracts entered into between you and us;
- to allow you to participate in interactive features of our service, when you choose to do so; and

- to notify you about changes to our service.

We may also use your data, or permit selected third parties to use your data, to provide you with information about goods and services which may be of interest to you and we or they may contact you about these by post or telephone.

If you are an existing customer, we will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale to you.

If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this. **[Note: see suggested wording for the registration page in separate document]**

If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please tick the relevant box situated on the form on which we collect your data.

We do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in SW1). We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience.

5. LINKS

Our site contains links to other web sites over which we have no control. We are not responsible for privacy policies or practices of other websites to which you choose to link from this site. We encourage you to review the privacy policies of those other web sites so you can understand how they collect, use and share your information.

6. DISCLOSURE OF YOUR INFORMATION

We may disclose your personal information to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the Companies Act 2006.

We may disclose your personal information to third parties:

- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to our advisers, as well as the prospective sellers or buyers of such business or assets and their advisers;
- if VMIL or substantially all of its assets are acquired by a third party, in which case personal data held by VMIL about its customers will be one of the transferred assets; or

- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Terms and other agreements or to protect the rights, property or safety of VMIL, our customers or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

7. YOUR RIGHTS

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at **[Note: insert email address]**.

You may review, correct, update or change your personal information at any time by amending your details on the Site.

8. ACCESS TO INFORMATION

You are entitled to see the information held about you. If you wish to do this, please contact us at **[Note: insert email address]**. We may require you to provide verification of your identity and to pay an administration fee (which is currently £10) to provide a copy of the information we hold. Please note that in certain circumstances we may withhold access to your information where we have the right to do so under current data protection legislation.

9. CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our privacy policy in the future will be posted on this page. You should check this page occasionally to ensure you are happy with any changes. We may also, where appropriate, notify you of changes to our privacy policy by e-mail.

10. CONTACT

If you have any questions, comments or requests regarding this privacy policy please write to us at **[Note: insert email address]**.