

# PRIVACY POLICY

This privacy policy applies between you, the User of this Website, and Frontgrid Ltd, the owner and provider of this Website. Frontgrid Ltd takes the privacy of your information very seriously. This privacy policy applies to our use of any and all Data collected by us or provided by you in relation to your use of the Website.

Please read this privacy policy carefully.

## Definitions and interpretation

1. In this privacy policy, the following definitions are used:

<b>Data</b>	collectively all information that you submit to Frontgrid Ltd via the Website. This definition incorporates, where applicable, the definitions provided in the Data Protection Laws;
<b>Cookies</b>	a small text file placed on your computer by this Website when you visit certain parts of the Website and/or when you use certain features of the Website. Details of the cookies used by this Website are set out in the clause below ( <b>Cookies</b> );
<b>Data Protection Laws</b>	any applicable law relating to the processing of personal Data, including but not limited to the GDPR, and any national implementing and supplementary laws, regulations and secondary legislation;
<b>GDPR</b>	the UK General Data Protection Regulation;
<b>Frontgrid Ltd, we or us</b>	Frontgrid Ltd, a company incorporated in England and Wales with registered number 09198067 whose registered office is at Unit 11, Tal Y Sarn, Tremarl Industrial Estate, Llandudno Junction, LL31 9PW;
<b>UK and EU Cookie Law</b>	the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011 & the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2018;
<b>User or you</b>	any third party that accesses the Website and is not either (i) employed by Frontgrid Ltd and acting in the course of their employment or (ii) engaged as a consultant or otherwise providing services to Frontgrid Ltd and accessing the Website in connection with the provision of such services;
<b>Websites</b>	1. All usage of <a href="http://www.paradropVR.com">www.paradropVR.com</a> including your online profile that is part of the Parasphere League 2. <a href="http://www.frontgrid.co.uk">www.frontgrid.co.uk</a> 3. And any sub-domains of these digital interfaces and sites unless expressly excluded by their own terms and conditions
<b>Apps</b>	The ParadropVR app
<b>Digital Interfaces</b>	The digital interface which drives the ParadropVR virtual reality flying experience
<b>Venues</b>	Partner organisation(s) which have a ParadropVR installation at their location or which are responsible for operating one.

2. In this privacy policy, unless the context requires a different interpretation:
  - a. the singular includes the plural and vice versa.
  - b. references to sub-clauses, clauses, schedules, or appendices are to sub-clauses, clauses, schedules or appendices of this privacy policy.
  - c. a reference to a person includes individuals, firms, companies, government entities, trusts and partnerships.
  - d. "including" is understood to mean "including without limitation".
  - e. reference to any statutory provision includes any modification or amendment of it.
  - f. the headings and sub-headings do not form part of this privacy policy.

## **Scope of this privacy policy**

3. This privacy policy applies only to the actions of Frontgrid Ltd and Users with respect to the Websites, Apps and Digital Interfaces as detailed in the definitions and interpretations section. It does not extend to any websites that can be accessed from those listed including, but not limited to, any links we may provide to social media websites.
4. For purposes of the applicable Data Protection Laws, Frontgrid Ltd is the "data controller". This means that Frontgrid Ltd determines the purposes for which, and the manner in which, your Data is processed.

## **Data collected**

5. We may collect the following Data, which includes personal Data, from you:
  - a. name
  - b. ParadrpVR flight details, such as venue, score, participation record
  - c. contact information such as email addresses and telephone numbers
  - d. timezone
  - e. job title
  - f. profession
  - g. age / date of birth
  - h. demographic information such as postcode, preferences and interests
  - i. financial information such as credit / debit card numbers which are used by our partner payment providers
  - j. IP address (automatically collected)
  - k. web browser type and version (automatically collected)
  - l. operating system (automatically collected)
  - m. a list of URLs starting with a referring site, your activity on this Website, and the site you exit to (automatically collected)

In each case, in accordance with this privacy policy.

## **How we collect Data**

6. We collect Data in the following ways:
  - a. data is given to us by you.
  - b. data is received from other sources; and
  - c. data is collected automatically.

## **Data that is given to us by you**

7. Frontgrid Ltd will collect your Data in a number of ways, for example:
  - a. when you contact us through the Websites, Apps and Digital Interfaces, by telephone, post, e-mail or through any other means
  - b. when you register with us and set up an account to receive our products/services/newsletters
  - c. when you complete surveys that we use for research purposes (although you are not obliged to respond to them)
  - d. when you enter a competition or promotion through a social media channel
  - e. when you make payments to us, through this Website or otherwise
  - f. when you elect to receive marketing communications from us
  - g. when you use our services

In each case, in accordance with this privacy policy.

## **Data that is received from publicly available third-parties' sources**

8. We will receive Data about you from the following publicly available third-party sources:
  - a. industry association lists
  - b. contact directories
  - c. online desk research

## **Data that is collected automatically**

9. To the extent that you access the Websites, Apps and Digital Interfaces, we will collect your Data automatically, for example:
  - a. we automatically collect some information about your visits to our Websites, Apps and Digital Interfaces. This information helps us to make improvements to Website content and navigation, and includes your IP address, the date, times and frequency with which you access the Website and the way you use and interact with its content.
  - b. we will collect your Data automatically via cookies, in line with the cookie settings on your browser. For more information about cookies, and how we use them on our Websites, Apps and Digital Interfaces, see the section below, headed "Cookies".

## **Our use of Data**

10. Any or all of the above Data may be required by us from time to time in order to provide you with the best possible service and experience when using our website, apps and digital interfaces. Specifically, Data may be used by us for the following reasons:
  - a. internal record keeping
  - b. improvement of our products / services
  - c. transmission by email of marketing materials that may be of interest to you
  - d. contact for market research purposes which may be done using email, telephone, fax or mail. Such information may be used to customise or update our Websites, Apps and Digital Interfaces in each case, in accordance with this privacy policy.
11. We may use your Data for the above purposes if we deem it necessary to do so for our legitimate interests. If you are not satisfied with this, you have the right to object in certain circumstances (see the section headed "Your rights" below).
12. To tell you about our products and services that you may be interested in.

13. For the delivery of direct marketing to you via e-mail, we'll need your consent, whether via an opt-in or soft-opt-in:
  - a. soft opt-in consent is a specific type of consent which applies when you have previously engaged with us (for example, you contact us to ask us for more details about a particular product/service, and we are marketing similar products/services). Under "soft opt-in" consent, we will take your consent as given unless you opt-out.
  - b. for other types of e-marketing, we are required to obtain your explicit consent; that is, you need to take positive and affirmative action when consenting by, for example, checking a tick box that we'll provide.
  - c. if you are not satisfied with our approach to marketing, you have the right to withdraw consent at any time. To find out how to withdraw your consent, see the section headed "Your rights" below.
14. When you register with us and set up an account to receive our services, the legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
15. We may use your Data to show you Frontgrid Ltd adverts and other content on other websites. If you do not want us to use your data to show you Frontgrid Ltd adverts and other content on other websites, please turn off the relevant cookies (please refer to the section headed "Cookies" below).

## **Who we share Data with?**

16. We may share your Data with the following groups of people for the following reasons:
  - a. Our ParadropVR Venues, so they can tell you about events and offers around ParadropVR.com as well as other activities at their venue
  - b. Any of our group companies or affiliates - to facilitate and optimise your experience
  - c. our employees, agents and/or professional advisors - to facilitate and optimise your experience
  - d. third party service providers who provide services to us which require the processing of personal data - to facilitate and optimise your experience
  - e. third party payment providers who process payments made over the Website - to facilitate and optimise your experience
  - f. digital advertising providers including LinkedIn, Meta (Facebook and Instagram), You Tube, Twitter, Google ads

In each case, in accordance with this privacy policy.

## **Keeping Data secure**

17. We will use technical and organisational measures to safeguard your Data, for example:
  - a. access to your account is controlled by a password and a username that is unique to you. Please note we reserve the right to change usernames or delete accounts which have usernames some people may find offensive.
  - b. we store your Data on secure servers
  - c. payment details are encrypted using SSL technology (typically you will see a lock icon or green address bar (or both) in your browser when we use this technology
18. Technical and organisational measures include measures to deal with any suspected data breach. If you suspect any misuse or loss or unauthorised access to your Data, please let us know immediately by contacting us via this e-mail address: [info@frontgrid.co.uk](mailto:info@frontgrid.co.uk)
19. If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit [www.getsafeonline.org](http://www.getsafeonline.org). Get Safe Online is supported by HM Government and leading businesses.

## Data retention

20. Unless a longer retention period is required or permitted by law, we will only hold your Data on our systems for the period necessary to fulfil the purposes outlined in this privacy policy or until you request that the Data be deleted.
21. Even if we delete your Data, it may persist on backup or archival media for legal, tax or regulatory purposes.

## Your rights

22. You have the following rights in relation to your Data:
  - a. **Right to access** - the right to request (i) copies of the information we hold about you at any time, or (ii) that we modify, update or delete such information. If we provide you with access to the information we hold about you, we will not charge you for this, unless your request is "manifestly unfounded or excessive." Where we are legally permitted to do so, we may refuse your request. If we refuse your request, we will tell you the reasons why.
  - b. **Right to correct** - the right to have your Data rectified if it is inaccurate or incomplete.
  - c. **Right to erase** - the right to request that we delete or remove your Data from our systems.
  - d. **Right to restrict our use of your Data** - the right to "block" us from using your Data or limit the way in which we can use it.
  - e. **Right to data portability** - the right to request that we move, copy or transfer your Data.
  - f. **Right to object** - the right to object to our use of your Data including where we use it for our legitimate interests.
23. To make enquiries, exercise any of your rights set out above, or withdraw your consent to the processing of your Data (where consent is our legal basis for processing your Data), please contact us via this e-mail address: [info@frontgrid.co.uk](mailto:info@frontgrid.co.uk).
24. If you are not satisfied with the way a complaint you make in relation to your Data is handled by us, you may be able to refer your complaint to the relevant data protection authority. For the UK, this is the Information Commissioner's Office (ICO). The ICO's contact details can be found on their website at <https://ico.org.uk/>.
25. It is important that the Data we hold about you is accurate and current. Please keep us informed if your Data changes during the period for which we hold it.

## Transfers outside the United Kingdom and European Economic Area

26. Data which we collect from you may be stored and processed in and transferred to countries outside of the UK and European Economic Area (EEA). For example, this could occur if our servers are located in a country outside the UK or EEA or one of our service providers is situated in a country outside the UK or EEA. We also share information with our group companies, some of which are located outside the UK or EEA.
27. We will only transfer Data outside the UK or EEA where it is compliant with data protection legislation and the means of transfer provides adequate safeguards in relation to your data, eg by way of data transfer agreement, incorporating the current standard contractual clauses adopted by the European Commission.
28. To ensure that your Data receives an adequate level of protection, we have put in place appropriate safeguards and procedures with the third parties we share your Data with. This ensures your Data is treated by those third parties in a way that is consistent with the Data Protection Laws.

## Links to other websites

29. These Websites, Apps and Digital Interfaces may, from time to time, provide links to other websites. We have no control over such websites and are not responsible for the content of these websites. This privacy policy does not extend to your use of such websites. You are advised to read the privacy policy or statement of other websites prior to using them.

## Changes of business ownership and control

30. Frontgrid Ltd may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of Frontgrid Ltd. Data provided by Users will, where it is relevant to any part of our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this privacy policy, be permitted to use the Data for the purposes for which it was originally supplied to us.
31. We may also disclose Data to a prospective purchaser of our business or any part of it.
32. In the above instances, we will take steps with the aim of ensuring your privacy is protected.

## Cookies

33. Our Websites, Apps and Digital Interfaces may place and access certain Cookies on your computer. Frontgrid Ltd uses Cookies to improve your experience of using its Websites, Apps and Digital Interfaces and to improve our range of products and services. Frontgrid Ltd has carefully chosen these Cookies and has taken steps to ensure that your privacy is protected and respected at all times.
34. All Cookies used by this Websites, Apps and Digital Interfaces are used in accordance with current UK and EU Cookie Law.
35. Before the Websites, Apps and Digital Interfaces places Cookies on your computer, you will be presented with a message bar requesting your consent to set those Cookies. By giving your consent to the placing of Cookies, you are enabling Frontgrid Ltd to provide a better experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of the Website may not function fully or as intended.
36. This Website may place the following Cookies:

Type of Cookie	Purpose
Strictly necessary cookies	These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
Analytical/performance cookies	They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
Functionality cookies	These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region). By using the Websites, Apps and Digital Interfaces, you agree to our placement of functionality cookie.
Targeting cookies	These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

37. You can find a list of Cookies that we use in the Cookies Schedule.
38. You can choose to enable or disable Cookies in your internet browser. By default, most internet browsers accept Cookies, but this can be changed. For further details, please see the help menu in your internet browser. You can switch

off Cookies at any time, however, you may lose any information that enables you to access the Website more quickly and efficiently.

39. You can choose to delete Cookies at any time; however, you may lose any information that enables you to access the Websites, Apps and Digital Interfaces more quickly and efficiently including, but not limited to, personalisation settings.
40. It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your internet browser if you are unsure about adjusting your privacy settings.
41. For more information generally on cookies, including how to disable them, please refer to [aboutcookies.org](https://aboutcookies.org). You will also find details on how to delete cookies from your computer.

## **General**

42. You may not transfer any of your rights under this privacy policy to any other person. We may transfer our rights under this privacy policy where we reasonably believe your rights will not be affected.
43. If any court or competent authority finds that any provision of this privacy policy (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this privacy policy will not be affected.
44. Unless otherwise agreed, no delay, act or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy.
45. This Agreement will be governed by and interpreted according to the law of England and Wales. All disputes arising under the Agreement will be subject to the exclusive jurisdiction of the English and Welsh courts.

## **Changes to this privacy policy**

46. Frontgrid Ltd reserves the right to change this privacy policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on its Websites, Apps and Digital Interfaces and you are deemed to have accepted the terms of the privacy policy on your first use of the Websites, Apps and Digital Interfaces following the alterations. You may contact Frontgrid Ltd by email at [info@frontgrid.co.uk](mailto:info@frontgrid.co.uk).

## **Attribution**

47. This privacy policy was created using a document from [Rocket Lawyer](https://www.rocketlawyer.com/gb/en) (<https://www.rocketlawyer.com/gb/en>).

This privacy policy was created on **23<sup>rd</sup> January 2022**.

## Cookies

“Cookies” are data files that are placed on your device or computer and often include an anonymous unique identifier. For more information about cookies, and how to disable cookies, visit <http://www.allaboutcookies.org>.

Below is a list of the cookies that we use. We have tried to ensure this is complete and up to date, but if you think that we have missed a cookie or there is any discrepancy, please let us know.

### Strictly necessary

We use the following strictly necessary cookies:

Description	Purpose
__hs_opt_out	This cookie is used by the opt-in privacy policy to remember not to ask the visitor to accept cookies again. This cookie is set when you give visitors the choice to opt out of cookies. It contains the string "yes" or "no". It expires in 13 months.
__hs_do_not_track	This cookie can be set to prevent the tracking code from sending any information to HubSpot. It contains the string "yes". It expires in 13 months.
__hs_initial_opt_in	This cookie is used to prevent the banner from always displaying when visitors are browsing in strict mode. It contains the string "yes" or "no". It expires in seven days.
__hs_cookie_cat_pref	This cookie is used to record the categories a visitor consented to. It contains data on the consented categories. It expires in 13 months.
hs_ab_test	This cookie is used to consistently serve visitors the same version of an A/B test page they've seen before. It contains the id of the A/B test page and the id of the variation that was chosen for the visitor. It expires at the end of the session.
hs-messages-is-open	When visiting a password-protected page, this cookie is set so future visits to the page from the same browser do not require login again. The cookie name is unique for each password-protected page. It contains an encrypted version of the password so future visits to the page will not require the password again. It expires in 14 days.
hs-messages-hide-welcome-message	This cookie is used to prevent the chat widget welcome message from appearing again for one day after it is dismissed. It contains a boolean value of True or False. It expires in one day.
__hsmem	This cookie is set when visitors log in to a HubSpot-hosted site. It contains encrypted data that identifies the membership user when they are currently logged in. It expires in one year.
hs-membership-csrf	This cookie is used to ensure that content membership logins cannot be forged. It contains a random string of letters and numbers used to verify that a membership login is authentic. It expires at the end of the session.
hs_langswitcher_choice	This cookie is used to save the visitor's selected language choice when viewing pages in multiple languages. It gets set when an end user selects a language from the language switcher and is used as a language preference to redirect them to sites in their



	chosen language in the future, if they are available. It contains a colon delimited string with the ISO639 language code.
__cfuid	This cookie is set by HubSpot's CDN provider because of their rate limiting policies. It expires at the end of the session. Learn more about Cloudflare cookies.
__cf_bm	This cookie is set by HubSpot's CDN provider and is a necessary cookie for bot protection. It expires in 30 minutes. Learn more about Cloudflare cookies.

## Functionality

We use the following functionality cookies:

Description	Purpose
N/A	All of our functionality cookies have been listed under strictly necessary cookies.

## Analytical/performance

We use the following analytical/performance cookies:

Description	Purpose
__ga	Used to distinguish users.
__gid	Used to distinguish users.
__ga__	Used to persist session state.
__gac_gb__	Contains campaign related information. If you have linked your Google Analytics and Google Ads accounts, Google Ads website conversion tags will read this cookie unless you opt-out. Learn more.
The ga.js JavaScript library uses first-party cookies to:	Determine which domain to measure; distinguish unique users; throttle the request rate; remember the number and time of previous visits; remember traffic source information; determine the start and end of a session; remember the value of visitor-level custom variables

## Targeting

We use the following targeting cookies:

Description	Purpose
Facebook Pixel	Collects data that helps us track conversions from Facebook ads, to optimize ads, and build targeted audiences for future ads and remarketing.
LinkedIn insight ad	Tracks website conversions tied to our LinkedIn ads to help optimise our marketing and remarketing campaigns
Google ads	Tracks website conversions tied to our Google ads to help optimise our marketing and remarketing campaigns

If you require further information about our Processing of your Personal Data, please contact our Data Protection Officer: Tammy Owens (Telephone: +44 (0)7825 077601 and Email: tao@frontgrid.co.uk).