Introduction

Rosenbridge Ltd, which operates https://superpayit.com and its owner/s respect the privacy of anyone who uses this website. This Privacy Policy was created to demonstrate commitment to privacy.

This website - https://superpayit.com ("the website") gathers important information from its visitors and customers. This Privacy Policy is published to communicate how the information
about the website users is gathered, used and protected. Any services provided to you by the website are subject to this Privacy Policy (the "policy"). References in the Privacy Policy to the www.superpayit.com, “we”, “us”, “our”, “site”, “website” or similar refer to the website www.superpayit.com and any of its affiliates.

Any client or visitor, by using this site and using our services agrees to this Privacy Policy, our our Terms and Conditions. If you do not agree to this Privacy Policy, you must stop using https://superpayit.com.

We use your data to provide and improve our services. By using the services, you agree to the collection and use of information in accordance with this Policy. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms and Conditions, accessible from https://superpayit.com.

One of our main priorities is the privacy of our visitors. This Privacy Policy document contains types of information that is collected and recorded by https://superpayit.com and how we use it.

This Privacy Policy applies only to our online activities and is valid for visitors to our website with regards to the information that they shared and/or collect in https://superpayit.com. This policy is not applicable to any information collected offline or via channels other than this website.

Please contact us for further inquiries:

Our contact details
Owner and Registered Data Protection Controller (ICO Registration Number: ZA897746).
Name: Rosenbridge Ltd
Address: 10 Clifton Street, Block A , London, England and Wales - EC2A 4HT, United Kingdom
E-mail: support@superpayit.com

This Privacy Policy applies to any and all of the services accessible through this website (“Services”) that are available, unless it is expressly stated that a separate Privacy Policy applies to a particular Service, in which case that other Privacy Policy only applies. This Policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

Other websites: Any other website or platform advertised or otherwise linked on this website might be owned or operated by another corporate. You are responsible for making sure that you have also read and understood the relevant website’s or the relevant appstore’s Privacy Policy as well as our Privacy Policy.

Children: This website is not intended for children under the age of 18 and we do not knowingly collect data relating to children. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

This Policy complies with the General Data Protection Regulation ((EU) 2016/679) (GDPR) and the Data Protection Act 2018 (2018).

Under data protection laws, we are required to provide you with certain information about who we are, how we process your personal data and for what purposes, and your rights in relation to
your personal data. This information is provided in this Policy and it is important that you read the information below.

28. Consent
By using our website, you hereby consent to our Privacy Policy and the Terms and Conditions and agree to its terms.

29. Information we collect
The personal information that you are asked to provide, and the reasons why you are asked to provide it, will be made clear to you at the point we ask you to provide your personal information.

If you contact us directly, we may receive additional information about you such as your name, email address, phone number, the contents of the message and/or attachments you may send us, and any other information you may choose to provide.

When you register for an Account, in accordance with our Terms and Conditions we may ask for your contact information, including items such as name, company name, address, email address, and telephone number.

Please read below for more detailed information on what we collect and why.

Data collected:

- We may process data about your use of our website and services ("usage data"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your use of our website or services. The source of the usage data is Google Analytics. This usage data may be processed for the purposes of analysing the use of our website and services. The legal basis for this processing is the legitimate interest of our agency, namely the monitoring and improvement of our website and services.

- We may process information needed to set up and maintain an account with us in order to provide you with our services ("account data"). This account data may include your name and email address. The source of the account data is the information you provide. The account data may be processed for the purposes of, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal bases for this processing is to allow the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

- We may process information to be included in your personal client profile on our website ("profile data"). This profile data may include your name, address, telephone number, email address, gender, date of birth and employment details. Profile data may be processed for the purposes of enabling your use of our services. The legal basis for this processing is to allow the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

- We may process your personal data that are provided in the course of the use of our services ("service data"). This service data may include information about your academic performance and any factors relevant to this, your current, past or future academic institutions, your availability for tuition sessions, your preferred tuition location, and your
experience or qualifications. We gather this information directly from you. Service data may be processed for the purpose of effectively providing our services. The legal basis for this processing to facilitate the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

- We may process information that you post for publication on our website or through our services ("publication data"). The publication data may be processed for the purposes of enabling such publication and administering our website and services. The legal basis for this processing is consent.

- We may process information contained in any enquiry you submit to us regarding our services ("enquiry data"). Enquiry data may be processed for the purposes of offering or providing relevant services to you. The legal basis for this processing is the legitimate interest of our agency, namely to respond to enquiries concerning our services and to make our services available to potential clients.

- We may process information relating to our customer relationships, including customer contact information ("customer relationship data"). The customer relationship data may include your name, your contact details, and information contained in communications between us and you. The source of the customer relationship data is you. The customer relationship data may be processed for the purposes of managing our relationships with customers, communicating with customers, keeping records of those communications and promoting our services to customers. The legal basis for this processing is the legitimate interest of our agency, namely the proper management of our customer relationships.

- We may process information relating to transactions, including purchases of goods and services, that you enter into with us and/or through our website ("transaction data"). Transaction data may include your contact details, details of the payment method used, including details of specific payment cards, your billing address, and the details of the transaction itself. The transaction data may be processed for the purpose of supplying the purchased goods and services and keeping proper records of those transactions. 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 and our legitimate interests, namely the proper administration of our website and business.

- We may process information that you provide to us for the purpose of subscribing to our email notifications ("notification data"). The notification data may be processed for the purposes of sending you the relevant notifications. The legal basis for this processing is the legitimate interests of our agency, namely the need to inform clients of relevant developments in relation to their use of our services, for example any charges to be levied in respect of those services.

- We may process information that you provide to us for the purpose of subscribing to our email newsletters, and/or promotional information ("marketing data"). This marketing data may be processed for the purposes of sending you the relevant newsletters. The legal basis for this processing is consent.

- We may process information contained in or relating to any communication that you send to us ("correspondence data"). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.

We may process any of your personal data identified in this Privacy Policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an
administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

We may process any of your personal data identified in this Privacy Policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risk.

In addition to the specific purposes for which we may process your personal data set out above, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

30. How we use your information

We use the information we collect in various ways, including to:

- Provide, operate, and maintain our website
- Improve, personalize, and expand our website
- Understand and analyze how you use our website
- Develop new products, services, features, and functionality
- Communicate with you, either directly or through one of our partners, including for customer service, to provide you with updates and other information relating to the website, and for marketing and promotional purposes
- Send you emails
- Find and prevent fraud

31. International Transfers of your Personal Data

Our website usage analytics provider, Google Analytics, is situated in the USA. Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity.

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: https://policies.google.com/privacy?hl=en

The European Commission has made an “adequacy decision” with respect to the data protection laws of the USA. Transfers to the USA will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission.

Some of our preferred Social Media platforms may also be situated in the USA. The European Commission has made an “adequacy decision” with respect to the data protection laws of the USA. Transfers to the USA will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission.
Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside United Kingdom and choose to provide information to us, please note that we transfer the data, including Personal Data, to United Kingdom and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

We take commercially reasonable steps to protect the Personal Data you provide to us from misuse, disclosure or unauthorized access. We only share your Personal Data with trusted third parties who use the same level of care in processing your Personal Data. That being said, we cannot guarantee that your Personal Data will always be secure due to technology or security breaches. Should there be a data breach of which we are aware, we will inform you immediately.

You acknowledge that personal data that you submit for publication through our website or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

32. Third Party Privacy Policies

Our Privacy Policy does not apply to other advertisers or websites. Thus, we are advising you to consult the respective Privacy Policies of these third-party ad servers for more detailed information. It may include their practices and instructions about how to opt-out of certain options.

You can choose to disable cookies through your individual browser options. To know more detailed information about cookie management with specific web browsers, it can be found at the browsers’ respective websites.

33. GDPR Data Protection Rights

The General Data Protection Regulation (GDPR) is a European Union (EU) privacy law that regulates how we will store, process and use the personal information of people located in the EU. Personal data is defined as any piece of data that, used alone or with other data, could identify a person.

If you are an EU/UK citizen, under the GDPR, you have the right to ask us for details about the way we use your personal data and you can ask us to do certain things with that data. These include:
• to correct your personal data;
• prohibit the use of your personal data for certain tasks;
• remove your personal data from our records completely; or
• ask how your personal data is being used.

You may do so by reading this Privacy Policy and contacting us at: support@superpayit.com

We are the data controllers under the GDPR, as we are collecting and using your Personal Data. We use trusted third parties as our data processors for technical and organizational purposes, including for payments and email marketing. We use reasonable efforts to make sure our data processors are GDPR-compliant.

We may process personal data belonging to certain ‘special categories’ as defined under the European Union’s General Data Protection Regulation. This data may include your ethnicity, religious views, and state of health, both physical and mental.[The source of this data is you, the data subject.] This data may be processed for the purposes of more accurately and effectively providing our services, and only insofar as it is necessary to achieve those purposes. The legal basis for this processing is consent, and the essential purpose of processing is the provision of confidential advice.

We would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

The right to access – You have the right to request copies of your personal data. We may charge you a small fee for this service.

The right to rectification – You have the right to request that we correct any information you believe is inaccurate. You also have the right to request that we complete the information you believe is incomplete.

The right to erasure – You have the right to request that we erase your personal data, under certain conditions.

The right to restrict processing – You have the right to request that we restrict the processing of your personal data, under certain conditions.

The right to object to processing – You have the right to object to our processing of your personal data, under certain conditions.

The right to data portability – You have the right to request that we transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us.

34. Children’s Information

Another part of our priority is adding protection for children while using the internet. We encourage parents and guardians to observe, participate in, and/or monitor and guide their online activity.

www.superpayit.com does not knowingly collect any Personal Identifiable Information from children under the age of 13. If you think that your child provided this kind of information on our
website, we strongly encourage you to contact us immediately and we will do our best efforts to promptly remove such information from our records.

35. Retaining data

When storing data, we aim to retain the data for no longer than is necessary for the purpose in which it was obtained, with the objective to ensure the highest level of data accuracy. Where identified as inaccurate, data is either rectified or destroyed in a secure manner.

Data retention periods may vary between operational activities, with the business providing consideration as to the length of time data is held for on a case by case basis.

Regarding storage, there are several ways in which your data may be stored:

Within cloud servers. When utilising platforms to fulfil our operational requirements, third party solutions may be used to store the data. As a company, we aim to utilise partners who have data centres within the European Economic Area (EEA).

Within physical servers. We maintain several physical servers which are securely located at our Head Office.

Hard copy, where hard copies of data are retained, they are kept in a secure and clean environment.

36. Data sharing and providing your data to others

We avoid sharing your personal data with third parties for marketing purposes, unless you have provided explicit consent for us to do so.

We may disclose your information in the following cases:

- To develop and create an improved customer experience. Often, this data is anonymised anyway.
- For a supplier to fulfil your experience gift operationally.
- We can disclose it if we have a legal obligation to do so, or to protect your or other people’s property, safety or rights.
- We can exchange information with specific third parties to protect against fraud or credit risks.
- Where data is transferred between systems, we ensure an encrypted connection is utilised. We are PCI (The Payment Card Industry Standard) compliant when taking payments via the web, with all payment partners meeting the highest level of compliance (Level 1). All of our associated websites maintain valid SSL certificates to allow secure connections from the web server to your browser, you will notice the padlock symbol is present within your search bar when browsing.

We may disclose your personal data to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes, and on the legal bases, set out in this policy.
We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

We may disclose enquiry data, profile data, service data or correspondence data to another or multiple clients of our agency insofar as reasonably necessary to effect an introduction between tutor and student for the purposes of arranging tuition, and to facilitate and administer that relationship, and to assist in the performance of the contract between tutor and student. The legal basis for this is the legitimate interest of our agency, namely the provision of our services.

We may disclose your transaction data to our accountant(s) for the purpose of enabling them to manage our financial records. This third party will act as a data controller in relation to the data that we supply to it.

In addition to the specific disclosures of personal data set out in this Section, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

Our Partners

You may consult this list to find the Privacy Policy for each of the partners of https://superpayit.com.

Our service functions alongside two third party payment processing providers Stripe Payments Europe, Ltd and Squareup Europe Limited, their legal policies on Data Protection and Data sharing and their Terms of Service can be found via links below.

Stripe

Financial transactions relating to our website and services may be handled by our payment services providers Stripe, https://stripe.com. You can find information about this payment services provider’s privacy policies and practices on their website, via https://stripe.com/en-gb/legal.

Square

Financial transactions relating to our website and services may be handled by our payment services providers Square, https://squareup.com. You can find information about this payment services provider’s privacy policies and practices on their website, via https://squareup.com/gb/en/legal/general/ua

• We will also store and use the Personal Data you give to us in order to process your payment for the purchase or subscribe to our services as per our Terms and Conditions and under a contract. We only use third party payment processors that take the utmost care in securing data and/or comply with the GDPR.
Some other third-party ad servers or ad networks that we use, may use technologies like cookies, JavaScript, or Web Beacons that are used in their respective advertisements and links that appear on https://superpayit.com, which are sent directly to users’ browser. They automatically receive your IP address when this occurs. These technologies are used to measure the effectiveness of their advertising campaigns and/or to personalize the advertising content that you see on websites that you visit.

Note that https://superpayit.com has no access to or control over these cookies that are used by third-party advertisers.

37. Amendments

This Policy is effective from 19/02/2021. The website reserves the right to change this Privacy Policy statement to reflect any changes to our privacy practices in accordance with changes to legislation, best practice of website enhancement.

Any changes will be immediately posted on our home page and we will contact you directly in this event to notify you we have updated our Privacy Policy. You are deemed to have accepted the terms of the Policy on your first use of this Website following the alterations.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

38. Your data protection rights and Opt-out Policy

7.1 If, at any time after registering for information or ordering the Services, you change your mind about receiving information from us or about sharing information with third parties, send us a request specifying your new choice at support@superpayit.com

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at support@superpayit.com

You have the right to make a complaint at any time to the ICO (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

The ICO’s address:
Information Commissioner’s Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113
ICO website: https://www.ico.org.uk
39. Cookies Policy:

What are Cookies?

Cookies are files that can be downloaded and saved to your computer, mobile, tablet or other electronic devise when you visit a website. Cookies are used by many websites and can do a number of things, such as remembering your preferences, recording what you have put in your shopping basket, and counting the number of people looking at a website.

The rules on cookies are covered by the Privacy and Electronic Communications Regulations 2003 (PECR). PECR also covers the use of similar technologies for storing or accessing information, such as ‘Flash cookies’ and device fingerprinting.

You can find out more about cookies at www.allaboutcookies.org and www.aboutcookies.org.

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

- Cookies may be either “persistent” cookies or “session” cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.
- Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

Log Files

www.superpayit.com follows a standard procedure of using log files. These files log visitors when they visit websites. All hosting companies do this and a part of hosting services' analytics. The information collected by log files include internet protocol (IP) addresses, browser type, Internet Service Provider (ISP), date and time stamp, referring/exit pages, and possibly the number of clicks. These are not linked to any information that is personally identifiable. The purpose of the information is for analyzing trends, administering the site, tracking users' movement on the website, and gathering demographic information.

Cookies and Web Beacons

Like any other website, www.superpayit.com uses 'cookies'. These cookies are used to store information including visitors’ preferences, and the pages on the website that the visitor accessed or visited. The information is used to optimize the users' experience by customizing our web page content based on visitors' browser type and/or other information.

Google DoubleClick DART Cookie

Google is one of a third-party vendor on our site. It also uses cookies, known as DART cookies, to serve ads to our site visitors based upon their visit to www.website.com and other sites on the internet. However, visitors may choose to decline the use of DART cookies by visiting the Google ad and content network Privacy Policy at the following URL – https://policies.google.com/technologies/ads
Our Advertising Partners

Some of advertisers on our site may use cookies and web beacons. Our advertising partners are listed below. Each of our advertising partners has their own Privacy Policy for their policies on user data. For easier access, we hyperlinked to their Privacy Policies below.

- Google
  https://policies.google.com/technologies/ads

Cookies used by our service providers:

- Our service providers use cookies and those cookies may be stored on your computer when you visit our website.
- We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google’s privacy policy is available at: https://www.google.com/policies/privacy/. The relevant cookies are: Google Analytics Tracking Code.
- We use Tutor Cruncher to manage our user database. This service uses cookies for the purpose of analysis of the use and performance of their platform and service. You can view the privacy policy of this service provider at https://secure.tutorcruncher.com/terms/

Managing cookies:

- Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:
  - https://support.google.com/chrome/answer/95647 (Chrome);
  - https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences (Firefox);
  - http://www.opera.com/help/tutorials/security/cookies/ (Opera);
  - https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies (Internet Explorer);
  - https://support.apple.com/en-us/HT201265 (Safari); and
- Blocking all cookies will have a negative impact upon the usability of many websites.
- If you block cookies, you will not be able to use all the features on our website.

Useful information

- A number of websites provide detailed information on cookies, including AboutCookies.org and AllAboutCookies.org.
- The European Interactive Digital Advertising Alliance website Your Online Choices allows you to install opt-out cookies across different advertising networks.
- Google has developed a browser add-on to allow users to opt-out of Google Analytics across all websites which use it. This is also available in the Chrome web store.
- Some browsers include a feature known as ‘Do Not Track’ or DNT. This allows you to indicate a preference that websites should not track you. However, whilst DNT is available in many browsers, websites are not required to recognise its request, so it may not always work. You can get help on how to use DNT in Microsoft Edge, Internet Explorer, Firefox, Chrome, Safari and Opera.
● Internet Explorer has a feature called Tracking Protection Lists which allows you to import a list of websites you want to block.

● For more information on how private browsing works as well as its limitations, visit the support pages for your browser: Microsoft Edge, Internet Explorer, Firefox, Chrome, Safari (mobile and desktop) and Opera.