INFORMATION WE COLLECT ABOUT YOU

We need to collect and process your personal information to run our business and provide you with the Services. If you don’t want us to collect or process your personal information in the ways described in this policy, you shouldn’t use the Services. We are not responsible for the content or the privacy policies or practices of any third-party service providers, third-party websites, or third-party apps.

Information You Provide

We may collect information you provide when you register, sign up, purchase, communicate with us, answer our surveys, upload content, or otherwise use the Services.

We collect information about you when you use our Services, including:

* Identification Information. Your name; email address; mailing address; phone number; photograph; birthdate; passport, driver’s license, Social Security Taxpayer Identification, or other government-issued identification; or other historical, contact, and demographic information when you register for, purchase from, or otherwise request Services from us.
* Financial Information. Information such as bank account, payment card numbers, credit reports, and other publicly available information.
* Tax Information. Withholding allowances and tax filing status.
* Other Information You Provide. Information that you voluntarily provide to us, including your survey responses; participation in contests, promotions, or other prospective seller marketing forms or devices; suggestions for improvements; referrals; details about your background and experience with us; details about any external transaction or investment history; or any other actions performed on the Services.

Information We Collect From Your Use of our Services

We collect information about you and the devices you use to access the Services, such as your computer, mobile phone, or tablet. The information that we collect includes:

* Precise Geolocation Information. The location of your device. For more information and to learn how to disable collection of location information, please [see below](https://response.com/privacy/#plink-location).
* Use Information. Information about how you use our Services, including your access time, “log-in” and “log-out” information, browser type and language, country and language setting on your device, Internet Protocol (“IP”) address, the domain name of your Internet service provider, other attributes about your browser, mobile device and operating system, any specific page you visit on our platform, content you view, features you use, the date and time of your visit to or use of the Services, your search terms, the website you visited before you visited or used the Services, data about how you interact with our Services, and other clickstream data.

Information We Collect from Other Sources

We also collect information about you from third parties, including:

* Identity Verification. Information from third-party verification services, mailing list providers, and publicly available sources.

Children’s Information

Our Services are general audience services not directed at children under the age of 18. We do not knowingly collect personal information from any user under 18. If we obtain actual knowledge that any information, we collect has been provided by a child under the age of 18, we will promptly delete that information. If you believe we might have any information from or about a user under 18, please contact us at Support@MyClientDevelopment.com.

HOW WE USE YOUR INFORMATION

We may use information about you for several purposes, including:

Providing, Improving, and Developing our Services

* Determining whether the Services are available in your country;
* Otherwise providing you with Services you choose to use;
* Providing, maintaining, and improving our Services;
* Developing new products and services;
* Delivering the information and support you request, including technical notices, security alerts, and support and administrative messages including to resolve disputes, collect fees, and provide assistance for problems with our Services or your account;
* Improving, personalizing, and facilitating your use of our Services;
* Measuring, tracking, and analyzing trends and usage in connection with your use or the performance of our Services.

Communicating with You About our Services

* Sending you information we think you may find useful or which you have requested from us about our products and services. We may also contact you with offers for additional services we think you will find valuable if you give us consent. You do not need to provide consent as a condition to purchase our goods or services. This communication may include contact by:
	+ Email
	+ Text (SMS/MMS) messages
	+ Telephone calls
	+ Automated phone calls or text messages
* Conducting surveys and collecting feedback about our Services.

Protecting our Services and Maintaining a Trusted Environment

* Investigating, detecting, preventing, or reporting fraud, misrepresentations, security breaches or incidents, other potentially prohibited or illegal activities, or to otherwise help protect your account;
* Protecting our, or our customers’ rights or property, or the security or integrity of our Services;
* Enforcing our Terms of Service or other applicable agreements or policies;
* Verifying your identity
* Complying with any applicable laws or regulations, or in response to lawful requests for information from the government or through legal process;
* Fulfilling any other purpose disclosed to you in connection with our Services;
* Contact you to resolve disputes, collect payments, and provide assistance with our Services.

Advertising and Marketing

* Marketing of our Services;
* Communicating with you about opportunities, products, services, contests, promotions, discounts, incentives, surveys, and rewards offered by us and select partners;
* If we send you marketing emails or SMS/MMS text messages, each email and message will contain instructions permitting you to “opt out” of receiving future marketing or other communications.
* If we call you to offer additional Services, you may request to be added to our internal do-not-call list. This will not remove you from security, legal, or administrative related communications.

Other Uses

* For any other purpose disclosed to you in connection with our Services from time to time.

HOW WE SHARE YOUR INFORMATION

We may share information about you as follows:

With Our Affiliates

* With our group companies and corporate affiliates, for the purposes outlined above.

With Third Parties

* With third parties to provide, maintain, and improve our Services, including service providers who access information about you to perform services on our behalf, as well as financial institutions, payment networks, payment card associations, partners providing services on our behalf, and other entities in connection with the Services;
* With third parties that run advertising campaigns, contests, special offers, or other events or activities on our behalf or in connection with our Services.

Safety and Compliance with Law

* If we believe that disclosure is reasonably necessary (i) to comply with any applicable law, regulation, legal process or governmental request (e.g., tax authorities, law enforcement agencies, etc.); (ii) to enforce or comply with our Terms of Use or other applicable agreements or policies; (iii) to protect our or our customers’ rights or property, or the security or integrity of our Services; or (iv) to protect us, users of our Services or the public from harm, fraud, or potentially prohibited or illegal activities.

With Your Consent

* With your consent. For example:
	+ At your direction or as described at the time you agree to share;
	+ When you authorize a third-party application or website to access your information.

Without Your Consent

* We also may share (within our group of companies or with third parties) aggregated and anonymized information that does not specifically identify you or any individual user of our Services.

HOW LONG WE RETAIN YOUR INFORMATION

We generally retain your information as long as reasonably necessary to provide you the Services or to comply with applicable law. However, even after you cancel or deactivate your account, we can retain copies of information about you and any transactions or Services in which you may have participated for a period of time that is consistent with applicable law, applicable statute of limitations or as we believe is reasonably necessary to comply with applicable law, regulation, legal process, or governmental request, to detect or prevent fraud, to collect fees owed, to resolve disputes, to address problems with our Services, to assist with investigations, to enforce our Terms of Use or other applicable agreements or policies, or to take any other actions consistent with applicable law.

COOKIES AND OTHER SIMILAR TECHNOLOGIES

We use various technologies to collect information when you access or use our Services, including placing a piece of code, commonly referred to as a “cookie,” or similar technology on your device and using web beacons. Cookies are small data files that are stored on your hard drive or in your device memory when you visit a website or view a message. Among other things, cookies support the integrity of our registration process, retain your preferences and account settings, and help evaluate and compile aggregated statistics about user activity. We will begin collecting information about you or from activity on devices you use as soon as you use our Services. By using our Services, you permit us to collect and use your information from activity on devices you use in accordance with this Privacy Notice.

Certain cookies we use last only for the duration of your web or application session and expire when you close your browser or exit the application. Other cookies are used to remember you when you return to use the Services and, as such, will last longer.

We may use cookies to:

* Remember that you have visited us or used the Services before. This allows us to identify the number of unique visitors we receive, so that we can provide enough capacity to accommodate all our users.
* Customize elements of the promotional layout and/or content of our Services.
* Collect data about the way you interact with our Services.
* Collect data to assess and improve our advertising campaigns, including sending information to our business partners.
* Allow our business partners (including third parties) to use these tracking technologies to track your behavior on our behalf on our website(s) or application(s) (including when you use multiple devices) and on partner websites.
* Enable third parties to collect data about the way you interact across sites outside of our Services.
* Collect anonymous statistical information about how you use the Services (including the length of your web or application session) and the location from which you access the Services, so that we can improve the Services and learn which elements and functions of the Services are most popular with our users.

Some of the cookies used in the Services are set by us, and others are set by third parties who deliver services on our behalf.

Most web and mobile device browsers are set to automatically accept cookies by default. However, you can change your browser settings to prevent automatic acceptance of cookies, or to notify you each time a cookie is set.

You also can learn more about cookies by visiting [http://www.allaboutcookies.org](http://www.allaboutcookies.org/), which includes additional useful information on cookies and how to block cookies on different types of browsers and mobile devices. Please note, however, that by blocking or deleting cookies used in the Services, you may not be able to take full advantage of the Services.

We also may collect information using web beacons. Web beacons are electronic images that may be used in our Services or emails. We use web beacons to deliver cookies, track the number of visits to our website and apps, understand usage and campaign effectiveness, and determine whether an email has been opened and acted upon.

THIRD-PARTY ADVERTISING AND ANALYTICS

We can use third-party service providers to provide site metrics and other analytics services. These third parties can use cookies, web beacons, and other technologies to collect information, such as your IP address, identifiers associated with your device, other applications on your device, the browsers you use to access our Services, webpages viewed, time spent on webpages, links clicked, and conversion information (e.g., transactions entered into). This information can be used by Square and third-party service providers on behalf of Square to analyze and track usage of our Services, determine the popularity of certain content, and better understand how you use our Services. The third-party service providers that we engage are bound by confidentiality obligations and other restrictions with respect to their use and collection of your information.

This Privacy Notice does not apply to, and we are not responsible for, third-party cookies, web beacons, or other tracking technologies, which are covered by such third parties’ privacy policies. For more information, we encourage you to check the privacy policies of these third parties to learn about their privacy practices. For more information about targeted advertising specifically, please visit <http://www.aboutads.info/choices>.

Examples of our third-party service providers to help deliver our Services or to connect to our Services include:

* Google Analytics: We use Google Analytics to understand how our Services perform and how you use them. To learn more about how Google processes your data, please visit <https://www.google.com/policies/privacy/>. To opt out of Google Analytics please visit <https://tools.google.com/dlpage/gaoptout>.
* Facebook: We use Facebook to advertise and market our services. We also use Facebook Connect API to allow you to connect your Facebook account to your Square account. To learn more about how Facebook uses your data please visit <https://www.facebook.com/help/325807937506242/> or log on to your Facebook account and access your settings. To understand more about Facebook advertising please see here <https://www.facebook.com/about/ads>.
* LinkedIn: We use LinkedIn to advertise and market our services. To learn more about how LinkedIn uses your data please visit <https://www.linkedin.com/legal/privacy-policy> or log on to your LinkedIn account and access your settings. To understand more about LinkedIn advertising please see here <https://business.linkedin.com/marketing-solutions/ads>.

These third-party service providers make use of cookies to implement their services.

YOUR CHOICES

Personal Information

You may view, change, or correct information that you have provided by making a request to us using the [contact details below](#plink-contact), in which case we may need to verify your identity before viewing or otherwise changing or correcting your information.

Canceling or Deactivating Your Account

If you wish to cancel or deactivate your account, please refer to our Terms and Conditions listed on the website or your contractual agreement. For more information you can reach out to us using the [contact details below](#plink-contact).

Location Information

In order to provide certain Services, we may require access to location information, including precise geolocation information collected from your device. If you do not consent to collection of this information, certain Services will not function properly, and you will not be able to use those Services. You can stop our collection of location information at any time by changing the preferences on your mobile device. If you do so, some of our mobile applications will no longer function.

Do Not Track

Do Not Track (“DNT”) is an optional browser setting that allows you to express your preferences regarding tracking across websites. We do not have a mechanism in place to respond to DNT signals. We do track some activity across websites (including your search terms, the website you visited before you visited or used the Services, and other clickstream data) and we may continue to collect information in the manner described in this Privacy Policy from web browsers that have enabled DNT signals or similar mechanisms.

Promotional Communications

You can opt out of receiving promotional messages from us by following the instructions in those messages, by informing the caller that you would not like to receive future promotional calls or by replying STOP to any SMS/MMS message. Opting out of receiving communications may impact your use of the Services. If you decide to opt out, we can still send you non-promotional communications, such as digital receipts and messages about your account or our ongoing business relations.

California Privacy Rights

California law permits residents of California to request certain details about our disclosure of your personal information to third parties for direct marketing purposes during the immediately preceding calendar year. If you are a California resident and would like to request this information, please contact us at the address listed below.

SECURITY

We take reasonable measures, including administrative, technical, and physical safeguards, to protect your information from loss, theft, misuse, and unauthorized access, disclosure, alteration, and destruction. Nevertheless, the internet is not a 100% secure environment, and we cannot guarantee absolute security of the transmission or storage of your information. We hold information about you both at our own premises and with the assistance of third-party service providers.

STORAGE AND PROCESSING

We may, and we may use third-party service providers to, process and store your information in the United States, Canada, the European Union, and other countries.

CHANGES TO THIS PRIVACY POLICY

We may amend this Privacy Policy from time to time by posting a revised version and updating the “Effective Date” above. The revised version will be effective on the “Effective Date” listed. We will provide you with prior notice of material changes in how we use your information, including by email, if you have provided an email address. If you disagree with these changes, you may cancel at any time. Your continued use of our Services constitutes your consent to any amendment of this Privacy Policy.

CONTACT

Please contact our Privacy Department with any questions or concerns regarding this Privacy Policy.

Support@MyClientDevelopment.com

If you have any questions or concerns regarding our notice, or if you believe our notice or applicable laws relating to the protection of your personal information have not been respected, you may file a complaint with our Privacy Department listed above, and we will respond to let you know who will be handling your matter and when you can expect a further response. We may request additional details from you regarding your concerns and may need to engage or consult with other parties in order to investigate and address your issue. We may keep records of your request and any resolution.

COUNTRY/REGION-SPECIFIC DISCLOSURES

Residents of the European Economic Area

* If you elect not to provide person data

You may choose not to provide us with your information. However, if you choose not to provide your information, you may not be able to enjoy the full range of Services.

* How to exercise your rights

We take steps to keep your information accurate and up to date. If you reside in the European Economic Area, you have certain rights to the information that we have collected about you. To exercise your rights to your information, please email or mail to us using the [contact details above](#plink-contact). Subject to applicable law, we will respond to reasonable requests as soon as practicable, within the limits prescribed by law.

You have the following rights:

* + Right of access to your Information: You have the right to ask us for confirmation on whether we are processing your information, and access to the information related on that processing.
	+ Right to correction: You have the right to have your information corrected, as permitted by law.
	+ Right to erasure: You have the right to ask us to delete your information, as permitted by law. This right may be exercised among other things: (i) when your information is no longer necessary for the purposes for which it was collected or otherwise processed; (ii) when you withdraw consent on which processing is based; (iii) when you object to processing; or, (iv) when your information has been unlawfully processed.
	+ Right to restriction of processing: You have the right to request the limiting of our processing under limited circumstances, including: when the accuracy of your information is contested; when the processing is unlawful, and you oppose the erasure of your information and request the restriction of the use of your information instead; or when you have objected to processing.
	+ Right to data portability: You have the right to receive the information that you have provided to us, in a structured, commonly used and machine-readable format, and you have the right to transmit that information to another controller, including to have it transmitted directly, where technically feasible.
	+ Right to object: You have the right to object to our processing of your information, as permitted by law. This right is limited to processing. After which, we will no longer process your information unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.
* How we may disclose your information

The GDPR and national laws of European Union member states implementing the Regulation permit the sharing of information relating to users who are residents of the European Economic Area with third parties only under certain circumstances. If you reside in the European Economic Area, we will only share your information as described in our Privacy Policy under the heading How We Share Your Information if we are permitted to do so under applicable European and national data protection laws and regulations.

* Marketing communications

Where we are legally required to do so, we ask you for your prior consent before providing you with promotional materials or information. When required by local law, when marketing consent is obtained, we use the double-opt-in method (confirmation of your email address by email before sending you promotional messages) in order to verify your consent. You may revoke your consent at any time (this will not affect the processing of your information undertaken until the revocation). If you want to stop receiving promotional materials, etc., you can do so at any time as outlined in the Your Choices section above.

* Additional use of information

Additional use of your information that is not described in this Privacy Policy will only take place as required by statute or when we have obtained your consent.

* Legal Basis for Processing under the GDPR

In this section we provide information on the legal basis for our processing of your information:

* + When you register for an event, an account, or with our Services, such processing is necessary for the performance of our Services.
	+ When we collect precise location data following your prior consent, we process such data on the basis of your prior consent. In other cases where we process your location data without consent, for example in order to provide our Services, such as is necessary for the performance of our Services.
	+ When you communicate with us or sign up for promotional materials, we process such data on the basis of our legitimate interest, and our legitimate interest is to provide you with our promotional messages. Where we are required under applicable local law to obtain consent for sending you marketing information, the legal basis is your consent.
	+ When you participate in special activities, offers, promotions, or programs.
		- We process such data on the basis of our legitimate interest, and our legitimate interest is to provide you with our promotional messages.
	+ When you engage with our online advertising and we actively collect your information in this context, we process such data on the basis of our legitimate interest, and our legitimate interest is to provide you with our promotional message.
	+ When you access third party products and services and we obtain information about you from such third-party sources:
		- We process such data on the basis of our legitimate interest, and our legitimate interest is to enhance your experience and to improve our Services.
	+ When you connect with us through social media:
		- Where we collect your consent in such case, for instance for marketing purposes, we process such data on the basis of your prior consent.
		- Where we do not collect your consent in such case, we process such data on the basis of our legitimate interest, and our legitimate interest is providing you with better Services and to enable you to use the full range of our Services.
	+ When we collect data from third parties or publicly-available sources:
		- For information which we need in order to perform the Services, such processing is necessary for the performance of our Services.
		- With regard to other information, we process such data on the basis of our legitimate interest, and our legitimate interest is providing you with better Services and to enable you to use our Services more efficiently.
	+ When we leverage and/or collect cookies, device IDs, location data, data from the environment, and other tracking technologies, we process such data on the basis of your consent, and based on our legitimate interest, where we do not obtain your consent and our legitimate interest is to provide you with better Services or marketing.
	+ When we aggregate or centralize data, such processing is either necessary for the performance of our Services, or we process such data on the basis of our legitimate interest, and our legitimate interest is to provide you with better or customized Services and marketing.
	+ When we provide you geographically relevant Services, offers, or advertising:
		- Where we collect your consent in such case, we process such data on the basis of your prior consent.
		- Where we do not collect your consent in such case, for such data that we need in order to perform the Services, such processing is necessary for the performance of our Services.
		- Where we do not collect your consent in such case and where we do not need such data in order to perform the Services, we process such data for our legitimate interest in offering you marketing and improving our Services.
	+ When we disclose information to our affiliates and partners, and to our service providers and vendors:
		- Where we collect your consent in such case, we process such data on the basis of your prior consent.
		- Where we do not collect your consent in such case, such processing is necessary for the performance of our Services, or we process such dad on the basis of our legitimate interest, and our legitimate interest is to provide you with better Services and marketing.
	+ When we process or share information in the event of an actual or contemplated sale, we process such data for our legitimate interest in offering, maintaining, providing, and improving our Services.
	+ When we conduct analytics, we process such data on the basis of our legitimate interest, and our legitimate interest is to enhance your experience and to develop and improve our Services.
	+ When we investigate suspected illegal or wrongful activity, we process such data on the basis of our legitimate interest, and our legitimate interest is to ensure compliance with legal requirements and law enforcement requests and for public safety purposes.
* Right to lodge a complaint before the Data Protection Authority

We encourage you to contact us directly and allow us to work with you to address your concerns. Nevertheless, you have the right to lodge a complaint with a competent data protection supervisory authority, in particular in the EU Member State where you reside, work or the place of the alleged infringement. You have the right to do so if you consider that the processing of information relating to you infringes applicable data protection laws.

* Changes to this Privacy Policy

In order to enhance our Services, it might be necessary to change this Privacy Policy from time to time. We therefore reserve the right to modify this Privacy Policy in accordance with the applicable data protection laws. Please visit our website from time to time for information on updates to this Privacy Policy.

* How to contact us or our Privacy Office

In case of questions about the processing of your information please contact us at Support@MyClientDevelopment.com