



# COLOMA

INTERNATIONAL CONSULTING GROUP

## Privacy Policy

From time-to-time COLOMA Group. may ask for personal information as part of the registration process for newsletters and/or other services we offer to you through the COLOMA Group. web site. Personal information shared with COLOMA Group. is protected under the terms of this Privacy Policy. *All data collected will be treated with respect and adhere to this Privacy Policy.*

## Our privacy ethos

We respect your privacy.

We don't ask you for personal information unless we need it to facilitate a service you ask us to perform for you, or to assist with an inquiry you make. We only gather information we need to deliver the products and services we offer and to protect or improve our website and services.

We keep the personal data we gather only for the purposes you consent to, and only for as long as we need it to fulfill its purpose.

We do not harvest browsing data to profile you personally, and we don't present you with content or advertising based on tracking.

When you subscribe to our free Newsletter, we only use your contact details to email you the newsletter and manage your subscription. Our system sends an email asking you to confirm your intent to subscribe; and you may unsubscribe at any time with one click/tap using the clearly-visible



[www.colomagroup.com](http://www.colomagroup.com)

“unsubscribe” links inside every newsletter email we send, or by contacting us and asking to be removed.

When you complete an inquiry request form for a third-party product or service via COLOMA Group., we pass your contact details to the third party/parties providing that product or service you requested so they can respond to and progress your inquiry, and we send you an email to confirm this. Your contact details are not sent to or shared with anyone else.

## Newsletter registration

**We respect your privacy. Your Newsletter registration contact details are never shared or passed on to any third parties.**

When you register for the newsletter, you are asked to confirm your intent to register and the personal information gathered to facilitate this service will be stored and used for the purpose of sending you the newsletter and contacting you in regard to COLOMA Group. Our Newsletter software determines which subscribers open their emails and click on the Newsletter link(s) sent each month so that we can know the engagement levels of our readers, and manage our newsletter lists. You may withdraw your Newsletter Subscription (“unsubscribe”) at any time by clicking the “one click/tap” unsubscribe link included in every Newsletter email, or by contacting us asking for your free newsletter subscription to be cancelled.

## Services and referrals

Referrals via inquiry form

In some cases, we offer you the opportunity to connect with services offered by third parties by means an inquiry form on COLOMA Group.

This form asks you for your contact details and other information related to the inquiry so that a third-party associate can contact you and assist in regard to a service or opportunity you express an interest in.

The details you submit on the form(s) are stored on our inquiries system and shared only with the associate(s) offering the service or opportunity you have expressed an interest in, so that the third party/parties can contact you and progress your inquiry. Your contact details are not sent to or shared by us with anyone else.



COLOMA Group. provides an introduction service for readers to third parties with this service; we are not agents or intermediaries, and any business you might conduct with third parties is done so on their terms, including their own privacy policy. If you have questions or concerns about a person or company you have been connected to via COLOMA Group. please contact us.

Referrals by direct web link

Features on COLOMA Group. may link directly to a third party/parties offering products or services you may be interested to learn more about, and/or purchase from the business referred to by COLOMA Group. We provide an introduction service for readers to third parties through direct referrals; we are not agents or intermediaries, and any business you might conduct with third parties is done so on their terms, including their own privacy policy. If you have questions or concerns about a person or company you have been connected to via COLOMA Group. please contact us.

## **COLOMA Group. Cookies Policy**

What is a Cookie?

A cookie is a file containing a small amount of data sent to the browser on your computer or mobile device from a web site. The file stored is stored on your device's memory drive or chip.

A web site can send its own cookie to your browser if your browser's preferences allow it. Your browser will only permit a web site to access the cookie(s) it has sent to your computer. Most modern web sites use cookies to track online traffic statistics and provide services which require the use of cookies to function.

You have the choice to set your browser to accept all cookies, to notify you when a cookie is being left on your computer, or to reject all cookies. Check your browser's help section to learn more about this.

Web sites which offer interactive services generally require your browser to accept cookies in order for them to deliver their functionality and services to you.



If you elect to reject some or all cookies, certain services on COLOMA Group. might not be available to you and you may not be able to take full advantage of the resources offered by COLOMA Group. however, you will not be prevented from viewing COLOMA Group.

How COLOMA Group. uses Cookies/Web Beacons

We use cookies to provide services on the website and to gather *aggregate statistical data* and we use web beacons (which are similar to cookies) in our Newsletter Emails to help us manage the Newsletter list. Our web site uses a web traffic statistics program that tracks, *in aggregate*, how users of Mexperience.com are making use of our web site. This information helps us to understand how our website is being used and the data we gather helps us to understand what information users are interested in *in aggregate*. This statistical work does not personally identify any specific reader and we do not gather these data to profile or track specific users.

## Data protection / use of information

COLOMA Group. might be legally required to disclose your information where the disclosure is required by the order of a court, for the purpose of, or in connection with any legal proceedings (including prospective legal proceedings); for the purpose of obtaining legal advice; for the purpose of establishing, exercising or defending legal or property rights. We will disclose any information we have in our possession in response to any legal or criminal inquiry or investigation and/or if, in our sole discretion, we believe it is reasonably necessary or appropriate to protect rights and property.

**Personal data you share is treated with care and for the purposes of facilitating services you request via COLOMA Group. thus:**

**Your consent:** When you complete a form on COLOMA Group. you consent to share any personal information you have provided on the said forms (“correspondence”) for us to use in its entirety to help respond, and/or facilitate with assistance, and/or provide services relating to the subject matter in that correspondence. If you message us directly by use of a third-party service; for example, directly by email or by using a messaging or social media service, your transmission of that message also serves as consent.

**Newsletter:** If you choose to register for our Newsletter, we will record your name, email address and the country you indicate to us that you live in on



our Newsletter list. We will use this to send you the free Newsletter. You can unsubscribe at any time by tapping/clicking the “unsubscribe” link clearly placed in every newsletter email we send, or by contacting us directly to ask to be unsubscribed. When you unsubscribe, your contact information is removed from our system.

**Contacting us:** When you contact us, you consent that we may use the information you share on the contact form and/or email or message you send to respond to you, and/or to refer it to any other parties in regard to your question or inquiry, at our sole discretion.

**Referrals:** If you ask to be contacted by one of our Associates about a product or service by completing an online inquiry form, your details will be stored on our system and sent to the relevant Associate so that they can follow-up and make contact as you requested.

COLOMA Group. provides an introduction service for readers to third parties; we are not agents or intermediaries, and any business you might conduct with third parties is done on their terms, including their own privacy policy.

**Comments:** If you leave a reader comment on the website, the name and comment you enter on the comment form is published, but your email is not. Our comments system records the IP address as reported by your ISP: we only use this to deal with potential threats or illegal activity, we never use it to identify or track specific users. We actively monitor our comments and reserve the right to not publish, or to review, edit, or delete, any comment left on our website.

**Email newsletter opening:** Our Newsletter emails may contain a small image (sometimes called a ‘web beacon,’ similar to a ‘cookie’) which reports back as to whether an email has been opened or not. Some email programs block these, but where they are not blocked (and/or you agree to load images) our newsletter sending system will record you having opened that newsletter email. Our newsletter system will also record whether you clicked on a link(s) inside the email.

**We only use these data for statistical purposes and to help us manage our newsletter list.**

It’s helpful for us to know how many people are actively engaging with our newsletter, and we occasionally contact newsletter subscribers who have not opened and/or clicked for a long while, to ask if they still need the newsletter.



We don't want to send newsletter emails to people who no longer want to read them; this technology helps us to keep our newsletter list current and clean.

**Statistical data:** We have access to *aggregate, not personally-identifiable, data* about the number of visitors, the browsers and device types being used, the approximate geographical location of the user, how long users remain on-site, and what pages are being read, as well as a range of other *not personally-identifiable aggregate statistical data* that helps us to measure our website's effectiveness and popularity. The service that provides these reports places cookies (see above) on your device. We use these aggregate data only for statistical purposes and to help us understand how we may improve our content and services. If you use a web browser that blocks ads/usage tracking, your visit(s) to COLOMA Group. will not register on our aggregate statistics and you are not denied access to the website.

## Information we share with current or prospective advertisers/associates/partners

We may provide *aggregate, non-personally-identifiable information* to our current and prospective advertisers, clients, and business partners. For example, we may share information that tells advertisers that there are 10,000 people receiving a regular newsletter from COLOMA Group. but we won't tell them that e.g. Joe Smith is one of them, and we won't tell them that his/her email address is 'john-smith@any-email.com'

## COLOMA Group. working with third party service providers

We may associate ourselves with or employ third party service providers to help with certain development projects or activities that will help us to improve our business or understand our customers or clients better. In cases where we need to share your personal details with these providers to undertake any such works, these service providers offer the same level of privacy detailed in this Privacy Policy.



## **Business Transfer**

If COLOMA Group. were transferred or acquired, the data we hold would be one of the assets that becomes transferred to, or acquired by, a third party. You acknowledge that such transfers may occur, and that any acquirer of COLOMA Group. may continue to use your personal information as set out in this Privacy Policy.

## **Privacy Policy Changes**

COLOMA Group. may change its Privacy Policy from time to time, and at its sole discretion. COLOMA Group. encourages its visitors to check this page regularly for any changes to its Privacy Policy. Your continued use of the COLOMA Group. website after any changes made to this Privacy Policy will constitute your acceptance of such changes.

