

To Become a Mother Website Privacy Notice

1. INTRODUCTION

- 1.1. This website (the “Website”) is operated by To Become a Mother Limited and its affiliates (collectively referred to as “TBAML” “we”, “us”, “our”).
- 1.2. Data privacy and protection is very important to us. We have written this privacy notice so you can better understand how we collect data, what we do with it and how we look after it. We will also outline what rights you have over your data and how we protect and facilitate those rights.

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3. WHAT INFORMATION DO WE COLLECT FROM YOU?

3.1. We collect information:

- (a) when you register to receive our newsletter
- (b) when you pay for any of our products or services
- (c) when you attend any of TBAML podcast recordings or other events
- (d) if you participate in any research we undertake
- (e) if you join one of our communities or forums
- (f) when you enter a competition
- (g) if you contact us about a query or a complaint

3.2. We collect the following types of information:

- (a) **Contact information:** When you sign up to an email newsletter, purchase one of our products or services, enter a competition, join one of our online communities, post a message on the Website or participate in any of our podcasts, research projects or events, we will ask you to provide information such as your name, email and/or postal address so that we can provide you with the services requested.
- (b) **General personal information:** When conducting surveys or running competitions, in addition to contact information, we may collect other personal information such as your gender, date of birth, marital status, etc.
- (c) **Payment details:** When you purchase a product or service from us, we will also ask you for your payment details in addition to your contact information, in order to secure payment and to authorise access to our products and services.
- (d) **"Special" categories of data:** Sometimes, we may collect data in online surveys on what is called "special categories of data". These could be health, sexual orientation, religious beliefs etc. Whenever we conduct research on these topics, it is always optional, and we will make sure we have your consent to process this data. We will remind you at the time of why and how we are processing this data and what additional safeguards are in place for using, storing and ultimately either deleting or anonymising this data.

3.3. You can visit the Website without disclosing any personally identifiable information about yourself. By using the Website or submitting information to us through or in connection with the Website, you signify your consent to our collection, use and disclosure of your personal information in accordance with this privacy notice. If you do not agree with this privacy notice, you must not use the Website or submit information to us through or in connection with the Website.

4. HOW DO WE USE YOUR PERSONAL INFORMATION?

4.1. We collect different types of information about people for four main reasons:

- (a) To provide personalised services unique to individual users
- (b) So we can monitor and improve the services we offer
- (c) To sell advertising space on the Website. This helps us to keep the Website free for people who visit them
- (d) To market products and services which we think would be relevant to you

4.2. Newsletters

When you sign up to our newsletter, you are giving consent for us to use the email address provided to send you relevant information about the Website or any other service or products, including those of third parties, which we think may be of interest to you or which you have asked us to provide you with. We will only send you information about our services or services offered jointly with or on behalf of other organisations, if you have asked us to provide you with such information. You can withdraw this consent for any newsletter by unsubscribing at any time.

4.3. Advertising

We advertise on the Website and in newsletter to help keep most of the content free. We use cookies so that we can show you advertisements we believe might interest you. We have a legitimate interest in using cookies but you can opt in or out of using them at any

time. Please note, opting out of cookies does not mean you will not see any advertisements.

4.4. Statistics

We also gather information and statistics for the purposes of monitoring Website usage and may provide such aggregate information to third parties. These statistics will not include information that can be used to identify you.

4.5. Delivery of goods and services / Customer account management

We will use the information you have provided for the provision of products and/or services that you have requested and subsequently communicating with you about those products and services.

4.6. Competitions

4.7. When you enter one of our online competitions, we will process your information for the purposes of picking a winner. If you have opted-in to receiving information from us about our products and services (eg receiving subscriptions offers, event invitations, signing up for editorial newsletters etc) then we will use the information you provide to make sure we offer you relevant products and services (based on where you live, your age, gender, tastes, preferences etc). If you have opted-in to receive news and offers from any competition sponsors, we will share your information with them. Further details about this is outlined in the "who do we share information with" with section.

4.8. Customer queries and complaints

We process any information you provide when dealing with any complaints or enquiries made by you or legally on your behalf. If you have any concerns about the use of your personal information by us please contact us using the contact details in section 12 below.

5. LEGAL BASES FOR DATA PROCESSING – WHAT DOES IT MEAN AND HOW DO WE USE THEM?

5.1. The law on data protection sets out several different reasons why a company may collect and process your personal data and it is one of our duties to make sure you understand which of these lawful bases we are using to process your data.

(a) **Consent:** By submitting any personal information to us you consent to the use of information as set out in this privacy notice. We reserve the right to amend or modify this notice and if we do so we will post the changes on this page. It is your responsibility to check the notice every time you submit information to us. Use of the Website will signify that you agree to any such changes. In the event the purposes for processing your personal information change, then we will contact you as soon as practicable and seek your consent where such notification relates to a new additional purpose for processing.

(b) **Legitimate interest:** In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests. For example, we personalise the marketing content we provide you.

(c) **Contractual obligations:** In certain circumstances, we need your personal data to comply with our contractual obligations. For example, if you purchase a service from us, we will keep your name and address to fulfil your order.

- (d) **Legal compliance:** If the law requires us to, we may need to collect and process your data. For example, we can pass on details of people involved in fraud or other criminal activity affecting us to law enforcement.

6. DO WE SHARE YOUR INFORMATION WITH ANYONE ELSE?

6.1. We may disclose your information to:

- (a) our employees
- (b) our affiliates
- (c) our group companies and their employees
- (d) successors in title to our business
- (e) third party consultants, contractors or other service providers who may access your personal information when providing services (including but not limited to IT support services) to us
- (f) government bodies and law enforcement agencies and in response to other legal and regulatory requests
- (g) auditors or contractors or other advisers auditing, assisting with or advising on any of our business purposes, in any jurisdiction where we operate.

7. HOW LONG WILL WE KEEP YOUR DATA?

7.1. We will only keep your personal data for as long as is necessary to fulfil the relevant purposes as set out in this privacy notice and more widely to comply with our legal and obligations for example for tax purposes.

7.2. If you no longer want us to store your information you may request for it to be removed from our records, please see section 12 below for details of how to request removal. Please note that such removal may prevent us from supplying certain services to you.

7.3. We may also aggregate and anonymise personal data and use and share such aggregated and anonymised personal data with third parties for statistical purposes and for the purpose of data analytics, service development, and/or improvement.

7.4. DATA SECURITY AND CROSS-BORDER TRANSFERS

7.5. The Internet is not a secure medium. Please be aware that communications over the Internet, such as emails/webmails are not secure unless they have been encrypted. Your communications may route through a number of countries before being delivered – this is the nature of the World Wide Web/Internet. We cannot accept responsibility for any unauthorised access or loss of personal information that is beyond our control.

7.6. We adopt appropriate policies, rules and technical measures to protect the personal data that we have under our control (having regard to the type and amount of that data) from unauthorised access, improper use or disclosure, unauthorised modification, unlawful destruction or accidental loss. All of our employees and data processors that have access to, and are associated with, the processing of your personal information are obliged to respect the confidentiality of our visitors' information.

- 7.7. We ensure that your information will not be disclosed to government institutions or authorities except if required by applicable law or when requested by regulatory bodies or law enforcement organisations.
- 7.8. Owing to the global nature of the Internet infrastructure, the information you provide may be transferred in transit to countries outside the European Economic Area (which means all the European Union (EU) countries plus Norway, Iceland and Liechtenstein, together "EEA").
- 7.9. In each of these circumstances, we take steps to ensure that your personal data is adequately protected and in compliance with data protection laws such as entering into the UK's International Data Transfer Agreement (for transfers of personal data from the UK) – this is a set of contractual wording which has been issued by the UK's Information Commissioner's Office.
- 7.10. For further information on our transfers of personal data, please contact us at the contact details provided in the "Contacting Us" section below (see section 12).

8. COOKIES

The Website uses cookies for identification, analysis and advertising purposes. By using the Website you consent to the storing and accessing of cookies on your device.

9. AUTOMATED DECISION MAKING

Automated decision making refers to a situation where a decision is taken using personal information that is processed solely by automatic means (i.e. using an algorithm or other computer software) rather than a decision that is made with some form of human involvement. We do not currently use automated decision making as all decisions are reviewed by an individual.

10. LINKS TO OTHER WEBSITES

The Website may contain links to other websites run by other organisations. This privacy notice applies only to the Website, so we encourage you to read the privacy statements on any other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you have accessed them using links from the Website.

11. YOUR DATA RIGHTS

- 11.1. Under data protection laws within the UK and the EU, you have the right to make certain requests of us in relation to the personal data that we hold about you. If you wish to exercise these rights at any time please contact us using the details set out in the "Contacting us" section (see section 12).
- 11.2. Please note that not all of your data subject rights will be absolute; this means that there may be some circumstances where we may not be able to comply with your request (such as where this would conflict with our obligation to comply with other regulatory and/ or legal requirements). However, if we cannot comply with your request, we will tell you the reason, and we will always respond to any request you make.
- 11.3. There may also be circumstances where exercising some of these rights (such as the right to erasure, the right to restrict processing and the right to withdraw consent) will mean we can no longer provide you with our services and it may therefore result in the cancellation of our agreement with you. We will inform you of these consequences when you exercise your right.

11.4. Your rights under data protection laws in the UK and EU are:

- (a) **the right to access your personal data:**
 - (i) you are entitled to a copy of the personal data we hold about you and certain details of how we use it; and
 - (ii) we will usually provide you with your personal data in writing, unless you request otherwise, or where you have made the request using electronic means, in which case the information will, where possible, be provided to you by electronic means;
- (b) **the right to rectification:** we take reasonable steps to ensure that your personal data that we hold is accurate and complete, however, you can ask us to amend or update the personal data if you do not believe that this is so or if your details change;
- (c) **the right to erasure:** you have the right to ask us to erase your personal data in certain circumstances, for example where you withdraw your consent or where the personal data we obtained is no longer necessary for the original purpose; this right, will, however, need to be balanced against other factors, for example, we may have legal obligations which mean we cannot comply with your request;
- (d) **the right to restrict processing:** in certain circumstances, you are entitled to ask us to stop using your personal data, for example where you think that we no longer need to use your personal data or where you think that the personal data we hold about you may be inaccurate;
- (e) **the right to data portability:** you have the right, under certain circumstances, to ask that we transfer personal data that you have provided to us to another third party of your choice;
- (f) **the right to object to marketing:** you can ask us to stop sending you marketing messages at any time. You can exercise this right by either clicking on the "unsubscribe" link which is contained in any email that we send to you or you can use the details set out in the "Contacting us" section to contact us (see section 12). Please note that exercise of this right does not extend to service related communications which, where necessary, we will continue to send;
- (g) **the right to object to processing:** where we process your personal data based on our legitimate business interests (indicated in this privacy notice), you can object to our processing. We will consider your objection and determine whether or not our legitimate business interests prejudice your privacy rights;
- (h) **the right to withdraw consent:** we may ask for your consent for certain uses of your personal data – we have indicated in this privacy notice where we do need your consent. You have the right to withdraw your consent at any time; and
- (i) **rights relating to automated decision-making:** we do not carry out any automated decision making. If this changes in the future, we will let you know.
- (j) **to the right to lodge a complaint with the applicable data protection supervisory authority:** we encourage you to contact us (using the details in the Contacting Us section (see section 12)) if you have any concerns with how we use your personal

data and we will do our best to resolve your concerns. However, please note that you have a right to complain to the applicable data protection supervisory authority (depending on your territory) if you believe that any use of your personal data by us is in breach of applicable data protection laws. If you are based in the UK, the relevant supervisory authority is the Information Commissioner's Office, you can find out more information at the Information Commissioner's Office website: <https://ico.org.uk/>. Please note that lodging a complaint will not affect any other legal rights or remedies that you have.

12. CONTACTING US

If you have any queries about how we handle your personal data, the contents of this privacy notice, your data protection rights under applicable data protection laws, how to update your records or how to obtain a copy of the personal data that we hold about you, please contact us using the following details: To Become a Mother Limited, Kemp House, 160 City Road, London EC1V 2NX

Alternatively, you can email us at caroline.johansen@tobecomeamother.com.

13. UPDATES TO THIS PRIVACY NOTICE

From time to time we may need to make changes to this privacy notice, for example, as the result of changes to applicable law, technologies, our services, or other developments. We will provide you with the most up-to-date privacy notice and you can check the Website periodically to view it.

This privacy notice was last updated on 1 July 2022.