

# Honeycomb Guest House's Privacy Policy

This Privacy Policy (the "Privacy Policy") describes how Honeycomb Guest House ("Honeycomb Guest House", "we", or "us") collects, uses and discloses information from and about you when you visit and use Honeycomb Guest House.com and Honeycomb Guest House's associated websites. Honeycomb Guest House respects your privacy and is committed to protecting it through our compliance with this Privacy Policy. By accessing or otherwise using the Websites, you agree to Honeycomb Guest House's collection, use and disclosure of your information, as data controller, in accordance with this Privacy Policy, which is incorporated into Honeycomb Guest House's [Terms of Use](#).

We regularly review our compliance with this Privacy Policy and whenever we receive a formal complaint, we will make best efforts to contact the person who made the complaint to attempt to resolve his or her concerns. If you have any concerns about the use of your information, or the contents of this Privacy Policy.

## Collection of Information

### *Legal Basis for Collecting and Processing Personal Information*

Honeycomb Guest House collects and processes your personal information when we have lawful bases for doing so. These lawful bases include when you provide consent.

### *Information You Provide*

Honeycomb Guest House collects information from you when you choose to provide it to us. For example, we may collect your information when you submit a form requesting information.

In some cases, you may choose not to provide us with your information, but we may require it when necessary to perform a contract or to comply with a legal obligation. We also may use information about you for reasons not described in this Privacy Policy where the reason is compatible with the purpose for which we originally collected your information and where such use is lawful.

### *Information Automatically Collected*

When you visit the Websites or interact with e-mails that we send to you, we may passively collect information from you and store that information on our server logs, including your internet protocol address ("IP address"), browser type, operating system, device identifier, device model, software version, or mobile or ISP carrier information. We also use Cookies and other technologies to collect information about your visit to the Websites, such as the date and time of your visit, the information you searched to find the Websites, or your activity on the Websites. "Cookies" are small files which may be stored on your computer during your use of the Websites and contain data about your use of the Websites. We may use session Cookies (which expire when you close your browser) or persistent Cookies (which stay on your computer until you delete them) to understand more about your activity on the Websites or on other websites.

Tracking Options and California Do Not Track Disclosures. You may adjust your browser or operating system settings to limit this tracking or to decline or delete Cookies, but you may be unable to access or use certain areas of the Websites. Check the “Help” menu of your browser or operating system to learn how to change your tracking settings or Cookie preferences. On your mobile device, you can adjust your privacy and advertising settings to limit your tracking for advertising or control whether you receive more relevant advertising. Note that our systems may not recognize Do Not Track headers or requests from some or all browsers.

Third-Party Cookies. You may adjust your browser or operating system settings to limit this tracking or to decline or delete Cookies, but you may be unable to access or use certain areas of the Websites. Check the “Help” menu of your browser or operating system to learn how to change your tracking settings or Cookie preferences. On your mobile device, you can adjust your privacy and advertising settings to limit your tracking for advertising or control whether you receive more relevant advertising. Note that our systems may not recognize Do Not Track headers or requests from some or all browsers.

#### *Information Collected from Other Sources*

We may collect or receive information about you from other sources with which you interact (e.g., Facebook), companies that are our partners, or other third parties to update or supplement the information that you provide or that we collect automatically. We may use this information to help us maintain the accuracy of the information we collect, to target our communications so that we can inform you of products, services or other offers that may be of interest to you, and for internal business analysis or other business purposes.

#### *Our Combination of Your Information*

We may combine the information we receive from and about you, via the Websites and from third parties, to help us tailor our communications to you and to improve the Websites.

#### *Failure to Provide Personal Information*

Failure to provide certain information may make it difficult or impossible for you to access some services through the Websites (for example, to register for and complete courses). You will need to ensure that personal information submitted to us is accurate and up-to-date (for example, we need a current email address to communicate with you about the Course in which you are enrolled).

## **How We Use Your Information**

Honeycomb Guest House may use the information that we collect from and about you in order to:

- Provide our services, including the set up and management of accounts and profiles.
- Personalize your experience on the Websites and in any Course in which you choose to enroll and help us to better respond to your individual needs.
- Develop new products or services or to conduct analysis to enhance current products and services.

- Engage in behavioral marketing and remarketing to users of the Websites and students, and marketing to potential students with similar interests, when you consent to such marketing or for the legitimate purpose of communicating with you regarding a Course.
- Review the usage and operations of the Websites and to analyze and improve the Websites (we continually strive to improve the Websites based on the information and feedback we receive from you).
- Contact you for the following purposes:
  - marketing,
  - advising you on Course information,
  - respond to your inquiries,
  - assisting you in completing your Courses, including communicating with you about your use of the Websites to complete a Course (you may not opt out of receiving these communications while participating in the Course), or
  - other legitimate business purposes (as specified above).
- Protect the security of the Websites.
- Verify your identity.
- As otherwise described at the point of collection or for purposes which you expressly permit us to use the information.

Honeycomb Guest House also may use de-identified information in an aggregated manner to help us analyze the use of the Websites. This Privacy Policy does not limit our use or disclosure of de-identified information, and we reserve the right to use and disclose such information to our partners, advertisers, and other third parties at our discretion. We will retain your personal information for as long as necessary to provide you with the services through the Websites or to otherwise administer and maintain the services and our Websites.

## How We Disclose Your Information

Honeycomb Guest House may share your information with other entities or individuals in the following circumstances:

- **Select Partners and Affiliates:** We may share your information with our select partners and affiliates that we believe may have offers of interest to you.
- **Service Providers:** We may share your information with our service providers that provide business, professional, or technical support functions for us. These service providers are only provided access to your information to the extent necessary to process your information and/or provide services to Honeycomb Guest House, and may not use or share your information for any other purposes. Honeycomb Guest House may disclose limited information about you to Service Providers to serve relevant advertising on third party platforms to you or to other audiences. If you do not want Honeycomb Guest House to disclose your information to Service Providers (including affiliated third parties which may not share the Honeycomb Guest House name) for their direct marketing or any other purpose, you may opt out of such disclosure by contacting us at [info@HoneycombHouse.com](mailto:info@HoneycombHouse.com)
- **Your Employer:** We may share your information with your employer, in the event that the employer is paying for your Course (information disclosed in this case shall include

Course performance information, unless otherwise expressly agreed in writing with Honeycomb Guest House).

- **Legal Matters; Safety:** We may access or share your information to satisfy any applicable law, regulation, legal process, or governmental request; in connection with an investigation on matters related to public safety; as permitted by law; or otherwise as required by law. We may disclose your information to protect the security of the Course, the Websites, servers, network systems, and databases. We also may disclose your information as necessary if we believe that there has been a violation of our Terms of Use (including investigation of potential violations thereof), any other legal document or contract related to the Websites, or the rights of any third party.
- **Fraud; Security:** We may access and disclose your information to detect, prevent, or otherwise address fraud, security or other technical issues.
- **Consent; Other:** We may share information with third parties when we have your consent, or otherwise as described to you at the point of collection.
- **Sale or Transfer of Business or Assets:** Honeycomb Guest House may sell or purchase assets during the normal course of our business. If another entity acquires us or any of our assets, information we have collected about you may be transferred to such entity. In addition, if any bankruptcy or reorganization proceeding is brought by or against us, such information may be considered an asset of ours and may be sold or transferred to third parties. Should such a sale or transfer occur, we will use reasonable efforts to try to require that the transferee use your information in a manner that is consistent with this Privacy Policy.
- **De-Identified Aggregate or Anonymous Information:** Honeycomb Guest House may also share de-identified aggregate or anonymous information with third parties for their marketing or analytics uses. For example, we provide Google Analytics with de-identified data so that they may provide us with a better understanding of visitors' interactions with the Websites, including actions a visitor takes while accessing the Websites or sites to which a visitor navigates after leaving the Websites. [Learn more about Google Analytics' use of de-identified data](#), and how to opt out of such use with a browser add-on, [here](#)
- **International Transfers:** We transfer personal data from the European Economic Area to other countries, some of which have not been determined by the European Commission to have an adequate level of data protection. In these instances, we use Standard Contractual Clauses, and some of our Service Providers may rely on Standard Contractual Clauses, Privacy Shield, or Binding Corporate Rules, to help ensure we and our Service Providers respect your data privacy rights and protect your data. If you would like a copy of our Standard Contractual Clauses, you may do so by contacting us at [info@Honeycombhouse.com](mailto:info@Honeycombhouse.com).

For California Residents: If you do not want Honeycomb Guest House to disclose your information to third parties (including affiliated third parties which may not share the Honeycomb Guest House name) for their direct marketing purposes, you may opt out of such disclosure by contacting us at [info@Honeycombhouse.com](mailto:info@Honeycombhouse.com).

## Information Security and Data Retention

We are committed to protecting the security of your information. We maintain what we believe to be appropriate physical, electronic, and managerial procedures to safeguard and secure your information and to prevent unauthorized access, maintain accuracy, and ensure appropriate use of your information. The accuracy, safety, and security of your information also depend on you. Where we have given you (or where you have chosen) a password for access to certain parts of the Websites, you are responsible for keeping this password confidential. We ask that you not share your password with anyone. Even though we do our best to protect your information, the transmission of information via the internet is not completely secure, and we cannot guarantee our security measures. We are not responsible for any unauthorized access to or acquisition of your information.

We will retain your personal information for as long as necessary to provide you with the services through the Website or to otherwise administer and maintain the services and our Website.

## **Your Rights Regarding Your Personal Information**

You may access and/or update your personal information through your user profile. In some instances, you may have the right to (a) request that Honeycomb Guest House export a full listing of your personal information in a commonly used electronic form (b) withdraw your consent to Honeycomb Guest House to process your personal information; and (c) request that Honeycomb Guest House restrict the processing of or delete your personal information. Certain personal information, however, is necessary for us to provide information to you about the Course or to provide services to you through the Websites or otherwise.

If you believe these rights regarding your personal information have been infringed upon, please contact . You also have a right to lodge a complaint with data protection authorities.

To the extent the above rights apply in your country, they may be limited in some situations, for example, if Honeycomb Guest House is under a legal requirement to retain certain information. If you wish to make a request described in this paragraph, or if you are otherwise unable to access and/or edit your personal information through your user profile, you may contact us <mailto:info@Honeycombhouse.com>

## **Changes to This Policy**

We review our privacy practices from time to time, and reserve the right to make changes to this Privacy Policy at any time. If we do make changes, we will give notice via the Website features or by emailing you. We recommend that you check the contents of the Privacy Policy whenever you have any new questions about privacy and our use of data, referring to the date of the last amendment listed at the bottom of the Privacy Policy.

**Date of Last Amendment: 22 December 2018**