**Coves Club Privacy Policy**

Effective Date: 05/05/2025

Coves Club Pty Ltd (referred to as 'we', 'our', or 'us') takes the protection of your personal information seriously. This Privacy Policy explains how we collect, use, disclose, and safeguard your personal data in compliance with privacy laws in Australia, the United States, and the United Kingdom.

By using our services, you agree to the practices outlined in this Privacy Policy. If you do not agree with any part of this policy, please refrain from using our services.

**1. Information We Collect**

We collect a variety of information to provide a seamless experience and to improve our services. Below is a comprehensive list of the types of information we collect.

a) Personal Information

We collect personal information directly from you and third parties where necessary. This may include:

* Contact Information: Full name, email address, mailing address, and phone number.
* Payment Details: Credit or debit card numbers, expiry dates, CVV codes, and billing address.
* Identity Verification: Information such as your date of birth, government-issued ID, or proof of residence, which may be required for certain services or legal compliance (e.g., age verification or giveaway eligibility).
* Membership and Transaction Information: Details about your subscription plan, renewal dates, purchase history, and participation in giveaways or promotional offers.
* Preferences and Feedback: Your preferences for communication, services, and any feedback provided via surveys or other channels.

b) Non-Personal Information

Non-personal information is automatically collected when you interact with our services. This may include:

* Technical Information: IP address, browser type and version, operating system, and device type.
* Usage Data: Details of your visits to our website or app, including traffic data, location data, and other communication data.
* Cookies and Tracking Data: Data collected through cookies, web beacons, and other tracking technologies to understand usage patterns and preferences. Users in the UK are shown a cookie consent banner in compliance with GDPR and UK privacy laws.

**2. How We Collect Information**

We collect your information through several methods to ensure accuracy and a seamless experience.

a) Direct Collection

You may provide information to us when:

* Creating an Account: Signing up for membership or creating an account on our platform.
* Making Transactions: Entering payment details during subscription or purchase.
* Participating in Giveaways: Submitting entry forms, uploading required documents, or completing eligibility verification.
* Communicating with Us: Sending inquiries, providing feedback, or interacting with our support team via email, phone, or chat.
* Filling Out Surveys: Sharing your opinions or preferences through voluntary surveys.

b) Automated Technologies

We use automated tools to collect information during your interactions with our services, including:

* Cookies: Small text files stored on your device that help us recognize returning users and personalize your experience.
* Log Files: Records of actions occurring on our platform, such as access times, error logs, and page visits.
* Third-Party Analytics: Tools like Google Analytics to track user behaviour and improve site performance.

c) Do Not Track Signals

Some web browsers may transmit "Do Not Track" (DNT) signals to websites. Currently, there is no industry standard that governs how to respond to these signals, and we do not alter our data collection or use practices upon receiving such signals. Accordingly, we do not respond to DNT signals at this time.

We continue to monitor developments in this area and will update our practices as standards emerge. Users can still manage tracking preferences through cookie consent tools (where available), browser settings, and opt-out mechanisms provided under applicable laws such as the GDPR and CCPA.

**3. How We Use Your Information**

We use your personal information for the following purposes:

a) Membership Management

* To create and manage your membership account.
* To provide access to exclusive content, giveaways, and member-only features.
* To communicate membership updates, renewal reminders, or service changes.

b) Transaction Processing

* To process payments securely and ensure accurate billing.
* To handle refunds or disputes related to transactions.

c) Customer Support

* To respond to your inquiries and resolve issues.
* To improve our customer service based on your feedback and interactions.

d) Legal and Compliance

* To verify your identity and eligibility for giveaways or other services.
* To comply with local regulations, including taxation and reporting requirements.

e) Marketing and Communications

* To send promotional emails about new features, giveaways, or offers, subject to your preferences.
* To analyse user behaviour and preferences for personalized marketing.

**4. Sharing Your Information**

We share your personal data only as necessary to fulfill our services or comply with legal obligations.

**a) Service Providers**

We may share your data with trusted third-party vendors, including:

* Payment Processors: To facilitate secure transactions.
* Hosting Services: To store and manage data on secure servers.
* Analytics Providers: To gather insights for service improvement.

b) Legal and Compliance

We may disclose your information:

* In response to lawful requests by public authorities.
* To protect our legal rights or prevent fraud.

c) Business Partners

Your information may be shared with partners for co-branded promotions, but only with your explicit consent.

d) Public Disclosure

For transparency, limited information (e.g., first name and region) of giveaway winners may be publicly shared. You may opt out of this by notifying us via email at contact@covesclub.com. This practice complies with Australian trade promotion laws and GDPR transparency requirements.

**5. Cross-Border Data Transfers**

To provide global services, your data may be transferred to and processed in countries with different privacy laws.

* Australia: Compliance with the Australian Privacy Principles (APPs).
* USA: Adherence to the California Consumer Privacy Act (CCPA) and other state laws.
* UK: Compliance with the General Data Protection Regulation (GDPR).

Where required, we use data transfer mechanisms, such as Standard Contractual Clauses (SCCs), to ensure your data is protected.

**6. Data Retention**

We retain your personal information only for as long as necessary to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is required by law.

* Transactional Data: Retained for tax and legal reporting.
* Membership Data: Retained for the duration of your membership and a limited period thereafter for reactivation purposes.
* Analytics Data: Retained in aggregate form to improve services.

Once no longer needed, data is securely deleted or anonymized.

**7. Security**

We take the following measures to protect your data:

* Encryption: Encrypting sensitive information during transmission and at rest.
* Access Control: Limiting access to personal data to authorized personnel only.
* Security Audits: Conducting regular reviews and updates of our systems.

Despite our efforts, no method of storage or transmission is completely secure.

**8. Your Rights**

a) Australia

Under the Privacy Act 1988, you have the right to:

* Access the personal data we hold about you.
* Request corrections if your information is inaccurate or incomplete.
* Complain to the Office of the Australian Information Commissioner (OAIC) if unsatisfied with our response.

b) USA

Under the CCPA (if applicable), you may:
- Request disclosure of the personal data we collect, use, or share.
- Opt out of the sale of personal data, if applicable. While we do not 'sell' personal data in the traditional sense, some data sharing may be considered a 'sale' under CCPA. You can exercise your rights via our website’s 'Do Not Sell My Personal Information' link if applicable.
- Request deletion of your personal data, subject to certain legal exceptions.

* Request disclosure of the personal data we collect and share.
* Opt out of data sales.
* Request data deletion, subject to legal exceptions.

c) UK

Under the GDPR, you have the right to:
- Access, correct, or delete your personal data.
- Object to or restrict data processing in certain circumstances.
- Request data portability.
- Withdraw consent where processing is based on consent.
- Lodge complaints with the Information Commissioner’s Office (ICO) in the UK.

Our legal bases for processing your data include contract performance (e.g., managing memberships), legal obligations (e.g., fraud prevention, tax compliance), legitimate interests (e.g., analytics, service improvements), and your consent (e.g., marketing).

* Access, correct, or delete your personal data.
* Object to data processing or request data portability.
* Lodge complaints with the Information Commissioner’s Office (ICO) in the UK.

**9. Managing Your Preferences**

You can update your preferences or withdraw consent for marketing communications at any time by:

* Adjusting your account settings.
* Clicking "Unsubscribe" in promotional emails.
* Contacting us directly at contact@covesclub.com

**10. Children’s Privacy**

Our services are designed for individuals aged 18 and older. If we learn that we have collected personal information from a child under 18 without verified parental consent, we will delete it promptly.

**11. Updates to This Policy**

Coves Club holds UK ICO Data Protection Certificate Registration reference: ZB816060. This registration indicates our compliance as a data controller under the UK’s Data Protection Act 2018 and the GDPR (UK).

We may revise this Privacy Policy periodically. All updates will be posted on our website with a revised "Effective Date."

**12. Contact Us**

For questions or concerns, please contact us at: contact@covesclub.com