DragonPass Privacy Policy

DragonPass is committed to protecting and respecting your privacy. This privacy policy, together with our Terms of Use and any other documents referred to in it, sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. If you are under 18, please do not send any personal data about yourself to us.

Under the General Data Protection Regulations (GDPR) DragonPass is defined as a data controller. By definition a data controller is a person or entity which determines the purpose and manner of which any personal data is, or is to be, processed.

1. What information do we collect from you?

1.1 In order to provide a better service to you, we may collect and process the following data about you:

• Information that you provide by filling in forms on our application. This includes information provided at the time of registering to use our app, subscribing to our service, posting material or requesting further services. We may also ask you for information at other times, for example in connection with a promotion or if you report a problem with our app.

  • If you contact us, we may keep a record of that correspondence.
  • We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
  • Details of transactions you carry out through our app and of the fulfilment of your orders.
  • Details of your visits to our app and the resources that you access.
  • If our service is a benefit of your payment card issuer, we may receive information from them for the purpose of managing a complaint.
  • For the response and resolution of customer support queries or complaints.

1.2 We only retain personal data for so long as it is necessary. Data may be archived as long as the purpose for which the data was used still exists. This is currently 3 years from the date your membership or booking expires.

2. Why do we collect this information?

2.1 The purposes for which information may be used by us inside and outside of the European Economic Area include:

• In order for us to be able to provide to you our service or product, which you have agreed to.
• Ensuring that content from our app is presented in the most effective manner for you.
• Providing you with alerts, newsletter, education materials or information that you requested or signed up to.
• Allowing you to participate in interactive features of our service, when you choose to do so.
• Complying with laws and regulations applicable to us or any of our affiliates inside or outside of the EEA.
• Legal proceedings, including collecting overdue amounts and seeking professional advices.
• Researching, designing and launching services or products including seminars/ events/ forums.

2.2 DragonPass International collects the minimum amount of personal data necessary in order to process the tasks described above. No irrelevant personal data is stored on the company’s systems.

3. Who might we share your data with?

3.1 We will keep the personal data we hold confidential but may provide information to:

• Personnel, agents, advisers, auditors, contractors, financial institutions, and service providers in connection with our operations or services.
• Our overseas offices, affiliates, business partners and counterparts (if any).
• Persons to whom we are required to make disclosure under applicable laws and regulations in or outside of the European Economic Area (EEA); or
• Actual or proposed transferees or participants of our services in or outside the EEA.
• Your card issuer and the payment card brand associated with your card e.g. to manage complaints.
• With your consent, our third party partners, for purposes such as surveys.

3.2 As an entity, DragonPass operates businesses both inside and outside of the EEA. These other factions of our business are based in China, Hong Kong, Singapore and South Africa. We require all service providers to process your information in a secure manner which is in accordance with updated data protection regulations. We utilise standard means under EU law to legitimise data transfers outside of the EEA.

4. What do we do with your data?

4.1 All information you provide to us is stored on our secure servers outside of the EU. Any payment transactions will be encrypted using TLS technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our service, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

4.2 Unfortunately, the transmission of information via the internet is not completely secure. Whilst we encrypt your data, if you are using a network which is unsecure or accessing the internet that is out of our control, we cannot guarantee the security of your data transmitted to our app. Therefore, any transmission is at your own risk and you agree not to hold us responsible for any breach of security while accessing the internet that is out of our control. Once we have received your information, we will use strict procedures and security features to prevent unauthorised access.

4.3 We may disclose your information to third party partners for the purposes set out in this Privacy Policy related to the function of our services. We require all third parties to have appropriate technical and operational security measures in place to protect your personal data, in line with EU law on data protection rules.

5. How long do we keep hold of your information?

5.1 Once your data is held on our system, we intend to hold this data for 3 years after the date of membership or booking expiry. Customers may request deletion of their personal data from DragonPass by contacting us on the phone number or email below.

6. How can you access the information DragonPass holds about you?

6.1 Under the General Data Protections Regulations (GDPR), individuals have the right:
• To check whether we hold personal data about you and to access such data.
• To require us to correct, as soon as reasonably practicable, any data relating to you that is inaccurate.
• To ascertain our policies and practices in relation to personal data and the kind of personal data held by us; and
• To object to the use of your personal data for marketing purposes. We shall not use your personal data for marketing purposes after you communicate your objection to us.
• To request the deletion of any personal data which the company (DragonPass International Ltd) may hold for that specific person.

6.2 You may exercise your opt-out right by notifying us if you wish to object to the use of your personal data for direct marketing purposes. Please send requests for such objections, access to data,
correction of data, information regarding policies and practices and kinds of data held, questions or complaints to the details found in the ‘how to contact us’ section.

6.3 In accordance with the terms of the GDPR, we have the right to and may charge a minimum fee for processing any data access request.

7. Payment Information

7.1 When making a payment with DragonPass you do so through the Stripe Checkout Gateway. In order to make a payment you will be required to pass your card number, expiry date and CVV code through this gateway. None of your card details will be stored on the DragonPass systems. This information will be solely retained in an encrypted format by Stripe.

8. Cookies

8.1 Our app uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

8.2 We use the following cookies:

   (a) Strictly necessary cookies. These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.

   (b) Analytical/performance cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

8.3 Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

8.4 You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

9. How to contact us

   Email: support@dragonpassuk.com
   Telephone: +44 (0)161 929 8844
   Write in: Data Protection Officer
   Address: 173a Ashley Road, Hale, Cheshire, United Kingdom, WA15 9SD

If you are unsatisfied with our response, you can contact the Information Commissioner’s Office (ICO). Further information can be found at https://ico.org.uk/.