

# Heartwired Club Privacy Policy

## Table of Contents

<b>1. Introduction.....</b>	<b>1</b>
<b>2. Data Controller and Contact.....</b>	<b>1</b>
<b>3. Types of Data Collected.....</b>	<b>1</b>
<b>4. Legal Bases and Purposes of Processing.....</b>	<b>3</b>
<b>5. Use of Cookies.....</b>	<b>5</b>
List of cookies used:.....	7
<b>6. Data Recipients and Transfers.....</b>	<b>9</b>
<b>7. User Rights.....</b>	<b>11</b>
<b>8. Data Retention.....</b>	<b>13</b>
<b>9. Changes to the Policy.....</b>	<b>15</b>
<b>10. External Links.....</b>	<b>15</b>

## 1. Introduction

The following policy defines the scope and purpose of our data processing and outlines your rights. By using our website or services, you agree to the practices described in this Privacy Policy.

The information below is provided in fulfilment of the information obligation under Article 13 of the GDPR.

## 2. Data Controller and Contact

We (the operator of Heartwired Club – ICEO LAB LTD, a private limited company registered in England and Wales (Company No. 11384164), with registered office at 1 Chapel Street, Warwick, United Kingdom, CV34 4HL) are the “data controller” (the organisation determining how your personal data is processed).

You can contact us regarding any privacy matters via the following **Contact Email: [to be confirmed]**

## 3. Types of Data Collected

We collect only the personal data necessary for the purposes described in this Policy. Personal data we may collect includes:

- **Name:** This may include your first name (e.g. when signing up for our newsletter or waitlist) and your full name (e.g. when making a purchase or registering for an event).
- **Email Address:** Your email address is collected for communications such as newsletters, waitlist updates, or account-related messages.
- **When** you create an account on Heartwired Club, we collect your login.

*Note: Creating an account is currently unavailable on the platform*

- **IP Address and Device Information:** When you visit our website, we automatically collect your Internet Protocol (IP) address and related technical data (browser type, device identifiers, etc.) to support our site's operation and security measures. This helps us understand usage patterns and secure our platform.
- **Payment Information:** Whenever you purchase our products or digital goods, we collect the data needed to process your transaction. This may include billing

name, billing address, and payment details (such as credit card number or payment account information).

**Note:**

1. *We do not store full payment card numbers on our own servers; payments are handled through accredited payment processors for security.*
2. *Purchasing digital products is currently unavailable on the platform.*

- **Other Data You Provide Voluntarily:** If you contact us directly (e.g. via email or a contact form) or provide information for other purposes (such as profile information, survey responses, etc.), we will receive whatever personal data you choose to share. We will use such data only for the purpose for which you provided it.

All the above data, to the extent it can identify you as an individual (either directly or indirectly), is considered “personal data” and protected under data protection law.

We do *not* collect any special categories of personal data (such as race, religion, or health data), personal data from children, or any unnecessary information.

## 4. Legal Bases and Purposes of Processing

We process your personal data only for specific purposes and on an appropriate legal basis in accordance with the GDPR.

Below, we explain the purposes for which we use your data and the corresponding legal bases:

Purpose	Legal basis
<p><b>Newsletter Signup:</b> If you subscribe to our Heartwired Club newsletter, we will use your name and email to send you educational content, updates, and marketing tips as requested.</p>	<p><b>Your consent</b> – by signing up to the waitlist you consent to us contacting you for this purpose (Art. 6(1)(a)).</p> <p>In case of a lead magnet processing can be seen as necessary for the performance of a contract (Art. 6(1)(b)).</p>
<p><b>Waitlist Enrolment:</b> When you join a waitlist (for example, to be notified about an upcoming course or product launch), we process your name and email to reserve your spot and inform you when the offering becomes available.</p>	<p><b>Your consent</b> – by signing up to the waitlist you consent to us contacting you for this purpose (Art. 6(1)(a)).</p> <p>If the waitlist relates to a product/service you intend to purchase, processing may also be seen as a pre-contractual step at your request (Art. 6(1)(b)), but we primarily rely on your consent.</p>
<p><b>Marketing Communications (Promotions and Updates):</b> To keep you updated about the launch you expressed interest in. We may ask for your permission (for example, via a checkbox on forms) to send additional marketing emails about our products or services, apart from the newsletter or waitlist.</p>	<p><b>Your consent</b> we will send you marketing communications only if you have explicitly agreed (opted-in) to receive them (Art. 6(1)(a)). We maintain records of your consent and you can opt out any time.</p>

<p><b>Purchases and Transactions:</b> If you buy a product, course, or other digital goods from Heartwired Club, we will process personal data necessary to complete the transaction.</p>	<p><b>Contractual necessity</b> – processing is necessary to perform the contract with you (Art. 6(1)(b) GDPR).</p> <p>Additionally, <b>legal obligation</b> (Art. 6(1)(c)) is a basis for certain processing: e.g. we must retain transaction records for tax and accounting compliance.</p>
<p><b>Analytics and Platform Improvement:</b> We use analytics tools to understand how users interact with our website and to improve our services. <b>Purpose:</b> To analyze website traffic, user behavior and preferences, which helps us enhance the user experience and fix technical issues. For instance, we may track page views, feature usage, and other aggregate metrics.</p>	<p><b>Your consent</b> – we will obtain your consent for deploying analytics cookies (see “Use of Cookies” below). In practice, this means analytical data collection via cookies will only occur if you have consented via our cookie banner or browser settings.</p>
<p><b>Legal Compliance and Protection:</b> We may process personal data to comply with our legal obligations and to protect our legal rights. <b>Purpose:</b> This includes using or retaining certain data as required by laws (e.g. tax law, financial regulations) or responding to lawful requests by authorities. It also includes processing data when necessary to <b>establish,</b></p>	<p><b>Legal obligation</b> for mandatory disclosures or record-keeping (Art. 6(1)(c) GDPR), and <b>legitimate interests</b> (Art. 6(1)(f)) for protecting our business (for example, ensuring IT security or asserting legal claims).</p>

exercise or defend legal claims and to prevent fraud or misuse of our services.	
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We will clearly inform you at the point of data collection why we are collecting your data and, when required, the legal basis. In summary, the main legal grounds we rely on are **consent, performance of a contract, legal obligations**, and our **legitimate interests** (for running and improving our business), as applicable. If you have any questions about the specific legal basis for any processing, feel free to contact us.

## 5. Use of Cookies

Like most websites, we use so-called **cookies** and similar technologies as part of the Service. Cookies are small files stored on the User's device that help recognise the User's browser on subsequent visits. We use cookies to ensure the proper functioning and security of the Service, to tailor content to your preferences, and for statistical and analytical purposes (for example, to determine which Service features are used most often). Cookies do not contain data that would allow for your direct identification – they are not used to determine your identity.

**Cookie Consent & Control:** By using our site, you will be presented with a cookie consent banner or settings tool (where legally required) that allows you to accept or reject non-essential cookies (such as analytical and advertising cookies). You can adjust your cookie preferences at any time via our website's cookie settings or your browser settings. If you choose to reject certain cookies, please note that some site features (especially personalisation or analytics-dependent features) may not function optimally. Essential cookies cannot be disabled via the banner as they are necessary for the site to work.

We will not set analytical or advertising cookies on your device without your prior consent (as required by applicable law). Your consent, once given, can be withdrawn at any time – this will stop further data collection by those cookies going forward (though it won't undo processing done before withdrawal).

Cookies can be either first-party (set by our Service) or third-party (from trusted external partners, for example, Google Analytics, which may set its own cookies). By using our Service, you consent to the use of cookies, in accordance with your browser settings.

**Third-Party Cookies and Tracking:** Some cookies on our site are set by third-party providers acting on our behalf. These companies may also use technologies like web beacons or pixels as part of their services.

Any data collected by third-party cookies will be governed by those third parties' privacy policies. We do not have direct control over these cookies, but we ensure that we only integrate third-party tools that are GDPR-compliant, and we obtain your consent where required.

You have the ability to change your cookie settings in your web browser at any time – you can block or delete cookies. Please note, however, that restricting the use of cookies may affect some functionalities of the Service (e.g., the ability to remember your preferences).

We categorise the cookies used as follows:

- **Necessary Cookies** - Necessary cookies are required to enable the basic features of this site, such as providing secure log-in or adjusting your consent preferences. These cookies do not store any personally identifiable data.

- **Performance Cookies** - Performance cookies are used to understand and analyse key website performance metrics, which help deliver a better user experience for visitors.
- **Functional Cookies** – Functional cookies help perform certain functions, such as sharing website content on social media platforms, collecting feedback, and enabling third-party features.
- **Advertisement Cookies** – Advertisement cookies are used to provide visitors with customised advertisements based on the pages they visited previously and to analyse the effectiveness of the ad campaign.
- **Analytics Cookies** – Analytics cookies are used to understand how visitors interact with the website. These cookies help provide information on metrics such as the number of visitors, bounce rate, traffic source, etc.

## List of cookies used:

Cookies	Retention period	Data Recipients	Purpose	Group
Authorization	session	Own cookies	Stores information about user authorization	Necessary cookies
__Host-next-auth.csrf-token	session	Own cookies	Stores a CSRF token to verify	Necessary Cookies



			requestorigin and prevent CSRF attacks.	
__Secure-next-auth.session-token.0	7days	Own cookies	Stores a session token to maintain the user's authenticated state across requests and enable secure user sessions.	Necessary Cookies
__Secure-next-auth.session-token.1	7days	Own cookies	Stores a sessiontoken to maintain the user's authenticated state across requests and	Necessary Cookies
__Secure-next-auth.callback-url	session	Own cookies	Stores the return URL during the NextAuth login flow.	Necessary Cookies
			Storesgoogle analytics	

_ga	400days	Thirdparty cookies	related information of the users	Analytics Cookies
_ga_<ID>	400days	Thirdparty cookies	Stores google analytics related information of the users	Analytics Cookies
time-zone	session	Own cookies	Stores information about the user time-zone	Necessary Cookies
favoriteAssets	session	Own cookies	Stores information about the group of the favorite assets in trade module	Necessary Cookies
dev_maintenance	session	Own cookies	Platform maintenance	Necessary Cookies
language	session	Own cookies	Stores information about the language selected by the user.	Necessary Cookies
cookieyes-consent	1 year	Thirdparty cookies	Stores the user's cookie consent preferences;	Necessary Cookies

			required for compliance.	
theme	session	Own cookies	Stores information about the theme used by the user.	Necessary Cookies
AMP_<id>	1 year	Third party cookies	Stores amplitude related information of the users	Performance Cookies

## 6. Data Recipients and Transfers

We treat your personal data with care and confidentiality. Within our organisation, access to your data is restricted to personnel who need it to perform their job duties (on a “need-to-know” basis). In certain cases, we share your personal data with external third parties – **service providers** or **partners** – who process data on our behalf or in joint cooperation.

We **never sell your personal information** to third parties, and we do not share it with others for their own independent marketing purposes without your consent. Any third-party processors we engage are bound by contracts (Data Processing Agreements) to process your data securely and only in accordance with our instructions, consistent with this Privacy Policy.

**The categories of data recipients include:**

- **Email Marketing Provider (Flodesk):** We use Flodesk, Inc., for our email newsletter and marketing automation. If you subscribe to our newsletter or marketing list,

your name and email address are stored in Flodesk to allow us to design and send out emails. Flodesk acts as a data **processor** on our behalf, meaning it handles your email data only to send communications as we direct. Flodesk is a U.S.-based company, so data may be transferred to the United States (see “International Transfers” below).

- **Analytics and Performance Tools (Google):** We use Google services (e.g., Google Analytics) to collect website analytics data. Google Ireland Limited (located at Gordon House, Barrow Street, Dublin 4, Ireland) processes usage data (such as IP addresses, device information, and browsing data) on our behalf for analytics purposes. Google acts as a processor when providing analytics, and the information is aggregated for our analysis. We have configured Google Analytics to anonymise IP addresses where possible. Google may store analytics data on servers outside the EEA (e.g., in the US). We rely on contractual safeguards for this transfer as described below.
- **Advertising Partners (Meta and others):** For advertising and retargeting, we share some data with partners like Meta Platforms (Facebook/Instagram). For instance, if you have consented to advertising cookies, the Meta Pixel on our site will send information about your visit (such as pages viewed or actions taken) to Meta. This allows us to create custom audiences and show you relevant ads on Meta's platforms. Meta may combine this information with your Facebook profile if you're a user, according to Meta's privacy policies. We also may use Google Ads or similar advertising networks to reach interested users; these providers may receive hashed identifiers or cookie data to help us measure ad performance.
- **Payment Processors:** If you make a purchase on Heartwired Club, your payment details will be processed by an external payment gateway (such as Stripe, PayPal, or another provider we use), which acts as an independent controller or processor in accordance with its own privacy policies. The processor handles the

payment on our behalf and will only use your data (such as your name, credit card number (encrypted), billing address, and payment amount) for that purpose.

- **Professional Advisors and Auditors:** In certain circumstances, we may share personal data with professional advisors (lawyers, accountants) or auditors to obtain advice or conduct audits/compliance reviews. These parties are bound by confidentiality and will only use the data for the purposes of their engagement.
- **Authorities and Legal Requirements:** If required by law, we may disclose personal data to government authorities, regulators, law enforcement or courts. For example, if we receive a subpoena or a lawful request for data (or to comply with tax and corporate obligations), we will have to provide the requested information. We will only do so after verifying the request's validity, and we will disclose only the minimum data necessary. Additionally, if it's necessary to prevent harm or illegal activities (for instance, to investigate fraud or security incidents), we may share information with appropriate authorities or other companies (e.g., payment fraud detection networks), as permitted by law.

We ensure that any third party with whom we share data has an obligation to keep your information secure and confidential. **All processors are chosen carefully.** They are only permitted to use personal data for the purposes we specify, not for their own.

**International Data Transfers:** ICEO LAB LTD is based in the United Kingdom, and our users may be worldwide. Whenever we transfer personal data outside of the United Kingdom or the European Economic Area (EEA), we take steps to ensure it remains protected. In these cases, we rely on appropriate safeguards as required by the applicable law.

Finally, aside from the situations described above, **we do not disclose your personal data to third parties.**

# 7. User Rights

Under the GDPR, you have several important rights regarding your personal data. Below you can find their summary:

- **Right of access** – to obtain information as to whether we are processing your personal data and, if so, what data, and to receive a copy of your data;
- **Right to rectification** – to request the rectification (correction) of your data if it is outdated or inaccurate, and to have incomplete data completed;
- **Right to erasure of data** (the “right to be forgotten”) – to request the deletion of your personal data in certain situations, e.g. when the data are no longer needed for the purposes for which they were collected, or when you withdraw your consent (provided there is no other legal basis for processing);
- **Right to restriction of processing** – to request the temporary restriction of processing your data (for example, if you contest the accuracy of the data or the basis for processing – for the period allowing us to verify it, or if you have objected to the processing – pending determination of whether our overriding legitimate grounds justify the processing);
- **Right to data portability** – to receive your personal data that you have provided to us, in a structured, commonly used, machine-readable format;
- **Right to object** – to object at any time to the processing of your personal data if it is based on our legitimate interest (Article 6(1)(f) GDPR). The objection should include reasons related to your particular situation. If personal data is processed for direct marketing purposes, you have the right to object at any time to such processing **without having to provide any justification.**
- **Right not to be subject to automated decision-making** – to not be subject to a decision based solely on automated processing (including profiling), if such a

decision would produce legal effects concerning you or similarly significantly affect you. *(In our Service, as a rule, we do not employ such fully automated decisions – each offer presented is the result of an analysis involving a human advisor on the financial partner's side.);*

- **Right to withdraw consent** – insofar as the processing of your data is based on consent, you have the right to withdraw your given consent at any time. Withdrawal of consent does not affect the legality of processing carried out before its withdrawal (this means that any processing performed before you withdrew consent remains lawful).

You can exercise any of your rights by contacting us (see the Data Controller contact details above). Typically, we will require some proof of your identity to ensure we do not disclose data to the wrong person – this is to protect your security. We will fulfil your request promptly – at the latest within the timeframes set out in the GDPR – and inform you of the actions taken.

Please note that some rights may not be absolute. For instance, if you request deletion, we might still retain certain data if required for legal compliance. If we cannot fulfil a request in whole or in part, we will provide you with an explanation. Rest assured, we strive to enable you to control your personal data.

## 8. Data Retention

We will keep your personal data **only for as long as necessary** to fulfil the purposes for which it was collected, including to satisfy any legal, accounting, or reporting requirements.

Because different types of data and processing have different needs, retention periods may vary. Here is an overview of how long we typically retain personal data before deletion or anonymisation:

- **Newsletter and Marketing Data:** If you have subscribed to our newsletter or other marketing communications, we will retain your contact information (e.g., email, name) until you unsubscribe or withdraw your consent. If you unsubscribe, we may keep your email address on a suppression list to prevent us from accidentally sending you further emails. Aside from that, if we have no other relationship with you, we will delete or anonymise your marketing data after a reasonable period following your unsubscription. If you are on a **waitlist**, we will use your data to notify you about the launch and may retain it for a short period after the product/course is launched (to follow up or gather feedback), unless you opt out earlier.
- **Purchase and Transaction Data:** When you buy something from us, we will retain your personal data related to that purchase for as long as necessary to complete the transaction and for as long as required by law. Moreover, we will retain data for any warranty, support, or dispute purposes related to the sale until any claims related to it expire, but no longer than absolutely necessary.
- **Analytics Data:** Analytics data collected via cookies is often aggregated and anonymised over time. Raw web analytics logs (which may include IP addresses or device IDs) are typically retained for a short period (e.g., 14 months, as configured in Google Analytics) unless we have a specific reason to keep them longer.
- **Account Data** (if applicable): If you register an account with Heartwired Club, we will retain your account data while your account is active. If you choose to close your account, we will delete or anonymise your personal data associated



with the account within a reasonable time after closure, provided we do not need to keep it for other purposes. Basic information confirming that you had an account (email address, account creation date, etc.) may be retained in archival backups or logs for a short period, but we will not use it for active purposes.

- **Legal Compliance and Disputes:** In the event of a legal dispute or receipt of a relevant legal request, we shall retain the relevant data until the issue is resolved. We will also retain your personal data for as long as it is necessary to comply with legal obligations.

Once the purpose for collecting your data has been fulfilled or the applicable retention period has elapsed, we will either securely delete or anonymise your personal data.

## 9. Changes to the Policy

We reserve the right to update or modify this Privacy Policy at any time to reflect changes in our practices, legal requirements, or new features on our platform. We will post the revised Privacy Policy on this page with a new **“Last Updated”** date.

All changes shall take effect upon posting, unless otherwise stated. We encourage you to review this page periodically to stay informed about how we are protecting your information.

For any significant changes that affect your rights or the way we use personal data, we will take additional steps to notify you. For example, we may display a prominent notice on our website (or within the platform) or notify you via email (if necessary). If we previously collected your data with your consent and the changes materially alter the processing, we may seek your consent again when required by law.

Your continued use of Heartwired Club after any modifications to this Privacy Policy will signify your acceptance of the updates. However, if changes require your consent, we will not apply them to your data until we have obtained such consent. We always indicate the date of the latest revision at the end of this Policy for transparency.

## 10. External Links

Our website may contain links to websites, apps, or services that are not operated by ICEO LAB LTD (for example, a link to an article, a partner's site, or social media pages). This Privacy Policy applies solely to personal data processed by Heartwired Club on our own domain and services.

If you click on a third-party link and leave our site, **we are not responsible for the content, security, or privacy practices of those external sites.** The operators of those websites will have their own privacy policies, which may differ from ours.

We recommend that you review the privacy policy of every website you visit, especially if you provide any personal information to them. **External links are provided for your convenience** and do not imply that we endorse or have reviewed the third party's policies. If you have any questions about how other sites use your information, please refer to their privacy statements and contact them directly as needed.

Thank you for reading our Privacy Policy. We value your trust and are committed to  
protecting your personal data.

*Last Updated: December 2, 2025.*