

muddle Privacy & Cookies Policy

25 May 2018

1. INTRODUCTION

- 1.1 Welcome to Muddle Technologies Limited's ("muddle", "we", "us" and "our") privacy & cookies policy (the "Privacy Policy").
- 1.2 muddle respects your privacy and is committed to protecting your personal data. This Privacy Policy, together with our Terms of Use [\[LINK\]](#) and any other documents referred to in the Terms of Use, will inform you of:
 - 1.2.1 the information (including your personal data) that we collect from you and other sources when you visit or use our websites (including getmuddle.com, getmuddle.co.uk, getmuddle.fr, muddle.fr and others) and mobile applications (including on the iOS and Android operating systems, respectively) (collectively, the "Services"), regardless of where you visit the Services from;
 - 1.2.2 the reasons for which we collect that information (including your personal data);
 - 1.2.3 how we may use and share that information (including your personal data);
 - 1.2.4 how we look after that information (including your personal data); and
 - 1.2.5 what your privacy rights are and how the law protects you.
- 1.3 The contents of this Privacy Policy are set out as follows:
 - 1. Introduction
 - 2. Important information and who we are
 - 3. The data we collect about you
 - 4. How is your personal data collected?
 - 5. How we use your personal data
 - 6. Disclosures of your personal data
 - 7. International transfers
 - 8. Cookies
 - 9. Data security
 - 10. How long will you use my personal data for?
 - 11. Your legal rights
 - 12. Deleting your account
 - 13. No rights of third parties

2. IMPORTANT INFORMATION AND WHO WE ARE

- 2.1 Purpose of this Privacy Policy
 - 2.1.1 This Privacy Policy aims to give you information on how muddle collects and processes your personal data through the use of the Services, including any data you may provide through the Services when you:
 - (a) sign up to use the Services;
 - (b) sign up to our newsletter;
 - (c) contact us to report an issue or obtain technical support;
 - (d) take part in a competition; or
 - (e) carry out certain other actions using, or in connection with, the Services or our social media channels (including Facebook, Twitter, Instagram and YouTube) ("**Social Media Channels**").
 - 2.1.2 The Services are not intended for use by individuals aged below the minimum age at which bars, pubs and nightclubs licensed to sell alcohol on-premises ("**Venues**") may serve you alcohol (without the presence of another person, such as a responsible adult) pursuant to your local laws (the "**Minimum Age**"). For example, the Minimum Age in the United

Kingdom is 18. We do not knowingly collect or process any information from persons under the Minimum Age, including children, at any time.

- 2.1.3 So that you are fully aware of how and why we are using your data, it is important that you read this Privacy Policy together with our Terms of Use and any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing your personal data. This Privacy Policy supplements other notices and privacy policies and is not intended to override them.

2.2 Controller

- 2.2.1 Muddle Technologies Limited is the controller and is responsible for your personal data.
- 2.2.2 We have appointed a data privacy manager who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

2.3 Contact Details

- 2.3.1 If you have any questions about this privacy policy or our privacy practices, please contact our data privacy manager in the following ways:
- (a) full name of legal entity: Muddle Technologies Limited (Company No. 09488508)
 - (b) email address: dataprivacy@getmuddle.com
 - (c) postal address: Beverley, Orchard Way, Cranbrook, Kent TN17 3LN, United Kingdom
- 2.3.2 You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us using the details set out above in the first instance.

2.4 Changes to the Privacy Policy and your duty to inform us of changes

- 2.4.1 We keep our Privacy Policy under regular review and may, at any time and for any reason, make changes to this Privacy Policy.
- 2.4.2 This Privacy Policy was last updated on 25 May 2018. Historic versions can be obtained by contacting us using the details set out above.
- 2.4.3 It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

2.5 Third Party Links

- 2.5.1 The Services may include links to third party websites, plug-ins and applications ("**Third Party Services**"). Clicking on those links or enabling those connections may allow third parties to collect or share data about you.
- 2.5.2 We do not control Third Party Services and are not responsible for their privacy statements. When you leave our Services, we encourage you to read the privacy policy of every Third Party Services that you visit.

3. THE DATA WE COLLECT ABOUT YOU

- 3.1 Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymised data).
- 3.2 The Services consist of a highly personalised, gamified map-based pub, bar and nightclub discovery app with powerful filtering features and unique real-time offers. To ensure the Services operate effectively, and to make sure you get the most out of the Services, we may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:
- 3.2.1 **identity data**, including first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, gender and public profile from social media service providers (including Facebook, Gmail / G+ and Twitter);
 - 3.2.2 **contact data**, including email address, telephone numbers and friends list from social media service providers (including Facebook, Gmail / G+ and Twitter);
 - 3.2.3 **technical data**, including internet protocol (IP) address, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access the Services;

- 3.2.4 **profile data**, including your username and password, ratings of Venues and favourites, interactions with functionality of the Services (including your activity log), interests, preferences, feedback, survey responses and competition entries;
 - 3.2.5 **location data**, including your latitude, longitude, approximate time of arrival at and/or departure from a Venue, approximate duration spent at a Venue and compass-related information. We are not interested in your location or activities outside of Venues, so rest assured we do not collect, use, store or transfer such data;
 - 3.2.6 **usage data**, including information about how you use our Services; and
 - 3.2.7 **marketing and communications data**, including your preferences in receiving marketing from us and third parties that we work with and your communication preferences.
- 3.3 We also collect, use and share **aggregated data** such as statistical or demographic data for any purpose. Aggregated data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity (for example, we may aggregate your usage data to calculate the percentage of users accessing a specific Service feature). However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.
- 3.4 We do not collect any special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data), with the exception of information about whether you recognise yourself as disabled where you select the "only show venues with disabled access and facilities" option via your profile page within our mobile applications.
- 3.5 We do not collect any information about criminal convictions and offences.
- 3.6 **If you fail to provide personal data:** where we need to collect personal data: (i) by law or (ii) in order to provide the Services to you, and you fail to provide that data when requested, we may not be able to perform our contract with you (including providing the Services) pursuant to our Terms of Use or otherwise. In this case, we may have to terminate our contract with you (including the provision of the Services to you, in whole or in part).

4. HOW IS YOUR PERSONAL DATA COLLECTED?

- 4.1 We use different methods to collect data from and about you including through:
- 4.1.1 **direct interactions:** you may give us your identity data, contact data, profile data, location data and marketing and communications data by filling in forms, corresponding with us (whether by post, telephone, email or otherwise) or using our Services. This includes personal data you provide when you:
 - (a) create an account using the Services;
 - (b) check-in to, or check-out from, Venues when using the Services;
 - (c) deselect the "make profile anonymous" option via your profile page when using our mobile applications;
 - (d) subscribe to our newsletters or otherwise request that marketing be sent to you;
 - (e) enter a competition, promotion or survey;
 - (f) interact with our Social Media Channels; or
 - (g) give us feedback or contact us, including to obtain technical support;
 - 4.1.2 **automated technologies or interactions:** as you interact with our Services, we will automatically collect location data, usage data and technical data about your equipment, browsing actions and patterns, including by using:
 - (a) **information from your browser or device:** these will differ depending on which type of device you are using (whether it's a PC, Mac, iPhone, Android, or otherwise) and the settings on that device, but includes the type of device you have (such as an iPhone 7 or Samsung Galaxy S8), the device's IP address, the browser you are using, your mobile network provider (for mobile devices), the web pages you have visited immediately before and after our Services, your time zone and country location, and crash or download error reports;
 - (b) **cookies:** when using the Services via our desktop or mobile websites, we may use these small text files that help improve your experience with the Services and make it easier to interact with us. We've set out more details about what information we collect via cookies, how, and what we use that information for, at Section 8 below;

- (c) **mobile device IDs and advertising IDs:** instead of cookies, when using the Services via our mobile applications (including iOS and Android), we use mobile device IDs (the unique identifier assigned to your mobile device by the manufacturer) and advertising IDs (if you are using iOS 6 or later) to recognise your device. We do this for the same reason as we collect cookies (as set out in Section 8 below); and
- (d) **pixel tags:** also known as web beacons or clear GIFs, which are invisible graphic tags that are embedded on web pages, advertisements and emails to allow us to access cookies (again, for the reasons set out in Section 8 below); and

4.1.3 **third parties or publicly available sources:** we will receive personal data about you from various third parties as set out below:

- (a) identity data, contact data and profile data from the following parties:
 - (i) Facebook based inside and outside the EU, where you sign-up to the Services via Facebook Connect;
 - (ii) Google based inside and outside the EU, where you sign-up to the Services via Gmail / G+; and
 - (iii) Twitter based inside and outside the EU, where you sign-up to the Services via Twitter; and
- (b) technical data from the following parties:
 - (i) analytics providers such as Google based inside and outside the EU;
 - (ii) advertising networks such as Google and Facebook, each based inside and outside of the EU;
 - (iii) search information providers such as Google based inside and outside of the EU.

5. HOW WE USE YOUR PERSONAL DATA

5.1 General

5.1.1 We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- (a) where we need to perform the contract we are about to enter into or have entered into with you (including to provide the Services to you in accordance with our Terms of Use [\[LINK\]](#));
- (b) where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; and
- (c) where we need to comply with a legal obligation.

5.1.2 With respect to lawful bases that we will rely on to process your personal data (as further set out in Section 5.2):

- (a) **legitimate interest** means the interest of our business in conducting and managing our business to enable us to give you the best services and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.
- (b) **performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- (c) **comply with a legal obligation** means processing your personal data where it is necessary for compliance with a legal obligation to which we are subject.

5.1.3 Generally, we only rely on consent as a legal basis for processing your personal data in connection with our direct marketing communications to you (including via email). You have the right to withdraw consent to marketing at any time via your profile page in our mobile applications (whether iOS, Android or otherwise) or using the "unsubscribe" button in the footer of our marketing communications.

5.2 Purposes for which we will use your personal data

5.2.1

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are (where appropriate). Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

Purpose / activity	Type of data	Lawful basis for processing
To register you as a new user of the Services	(a) Identity data (b) Contact data	Performance of a contract with you
To provide you with the Services that you request from us	(a) Identity data (b) Contact data (c) Profile data (d) Location data	(a) performance of a contract with you (b) necessary for our legitimate interests - to recover debts due to us.
To manage our relationship with you, including: (a) notifying you about changes to our Terms of Use or Privacy Policy; and (b) asking you to leave a review, provide information or take a survey.	(a) Identity data (b) Contact data (c) Profile data (d) Marketing and communications data	(a) performance of a contract with you (b) necessary to comply with a legal obligation (c) necessary for our legitimate interests – to: (i) keep our records updated; and (ii) study how users use our Services.
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity data (b) Contact data (c) Profile data (d) Usage data (e) Marketing and communications data	(a) performance of a contract with you (b) necessary for our legitimate interests – to: (i) study how users use our Services; (ii) develop our Services; and (iii) grow our business.
To administer and protect our business and the Services, including: (a) troubleshooting; (b) data analysis; (c) testing; (d) system maintenance; (e) support, including customer services; (f) reporting; and (g) hosting of data.	(a) Identity data (b) Contact data (c) Technical data (d) Location data	(a) necessary for our legitimate interests: (i) for running our business, provision of administration and IT services; (ii) for network security; (iii) to prevent fraud; and (iv) in the context of a business reorganisation or group restructuring exercise; and (b) necessary to comply with a legal obligation
To deliver relevant content and advertisements to you and measure or understand the effectiveness of the	(a) Identity data (b) Contact data (c) Profile data	Necessary for our legitimate interests – to: (a) study how users use our Services; to

advertising we serve to you	(d) Technical data (e) Location data (f) Usage data (g) Marketing and communications data	(b) develop our Services; (c) grow our business; and (d) inform our marketing strategy.
To use data analytics to improve our: (a) Services; (b) marketing; (c) user relationships; and (d) experiences.	(a) Technical data (b) Location data (c) Usage data	Necessary for our legitimate interests - to: (a) define types of users for our Services; (b) keep our Services updated and relevant; (c) develop our business; and (d) inform our marketing strategy)
To provide advertising to you and make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity data (b) Contact data (c) Technical data (d) Location data (e) Usage data (f) Profile data (g) Marketing and communications data	Necessary for our legitimate interests - to: (a) develop our Services; and (b) grow our business.

5.2.1 In any or all of these circumstances, we may perform these functions directly or use carefully selected third parties to perform these functions on our behalf. Where we use a third party, that third party will be subject to written agreements with us that restrict the third party's use of your personal information strictly to those activities necessary to perform their services to us.

5.2.2 Please note that we do not sell your personal data without your consent (whether your name, address, emails address, or otherwise) to any third party, including Venues or advertisers, unless it is first anonymised.

5.3 Marketing

5.3.1 We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established a privacy centre where you can view and make certain decisions about your personal data use, which can be located in your profile page via our mobile applications (whether iOS, Android or otherwise).

5.4 Promotional offers from us

5.4.1 We may use your identity data, contact data, technical data, location data, usage data and profile data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this "**marketing**").

5.4.2 You will receive marketing communications from us if you have:

- (a) opted in to receive marketing communications via our mobile applications (whether iOS, Android or otherwise); or
- (b) requested that we send you marketing communications via our websites..

5.5 Third party marketing

5.5.1 Advertising service providers, companies and networks may display advertisements via the Services from time to time. We do not provide any non-anonymised personal information to these third parties, but they may use tracking technologies (such as cookies or web beacons) to collect information about you if you view or interact with their advertisements.

5.5.2 Some of these third parties may be members of the Network Advertising Initiative, which provides you with a single location to opt out of advert targeting from member companies. See Section 5.6.1(d) below for further details on opting-out of data collection.

5.6 Opting out

5.6.1 We are committed to giving you the ability to take control of your personal information. You can use the following mechanisms to delete or prevent us from receiving your information (including deleting existing cookies or disabling future cookies), though note that doing so may prevent you from accessing certain features or functionality of the Services:

- (a) **collection of location information:** you can choose not to allow us to process your location data when you first use the Services, or at any time after that via the settings on your mobile device. Please note that if you restrict our use of your location data (whether in totality, or by limiting such collection to only when actively using the Services), you may not be able to use certain functionality within the Services;
- (b) **collection of information via cookies:** if you would like to delete any cookies that are already on your computer, please refer to the help and support area on your Internet browser for instructions on how to locate the file or directory that stores cookies. Information on deleting or controlling cookies is available at www.aboutcookies.org. In particular, to opt out of:
 - (i) Google Analytics cookies across all websites, visit the Google Analytics opt-out browser add-on; and
 - (ii) other third party cookies relating to behavioural advertising, please go to www.youronlinechoices.eu;
- (c) **collection of information via mobile device IDs and advertising IDs:** mobile device IDs cannot be deleted, but advertising IDs can be via the settings on your mobile device;
- (d) **sharing of information with advertisers for marketing purposes:** some advertising companies and networks may be members of the Network Advertising Initiative, which provides you with a single location to opt out of advert targeting from member companies (www.networkadvertising.org). Opting-out will not decrease the number of advertisements that you see, but may reduce the relevance to you and your preferences of the adverts that you do see;
- (e) **notifications:** we may deliver notifications to your mobile device from time to time. You can disable these notifications via the settings on your mobile device; and
- (f) **marketing communications:** you can ask us to stop sending you marketing communications at any time by logging into the Services and unchecking relevant boxes via your profile page to adjust your marketing preferences or by following the "unsubscribe" link in the footer of any of our marketing communications. Note that, where you opt out of receiving marketing communications, this will not apply to personal data provided to us that is necessary to fulfil any other purpose or activity as set out in the table above.

5.6.2 Please note that opting out of cookies, mobile device IDs, or advertising IDs does not mean you will stop seeing advertising in the Services. However, the company or companies from whom you opted-out will no longer deliver adverts tailored to your web preferences and usage patterns, which means you may see a greater number of adverts that are not relevant to you or your preferences.

5.6.3 'Do Not Track' ("DNT") is a privacy setting that users can set in their web browsers to inform websites that you do not want those websites to collect certain information about you. While we have provided you with the opt-out links and details above so you can take control of your personal information, please note that we do not currently recognise or respond to any DNT signals as the Internet industry continues to work towards defining a common approach to, and meaning of, DNT compliance.

5.7 Change of purpose

5.7.1 We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

5.7.2 If we need to use your personal data for an unrelated purpose, we will notify you (which may be via the Services, email or otherwise) and we will explain the legal basis which allows us to do so.

5.7.3 Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6. DISCLOSURES OF YOUR PERSONAL DATA

6.1 We may share your personal data with the carefully selected third parties set out below for the purposes set out in the table at Section 5.1 above:

6.1.1 **Internal Third Parties:** other companies in the Muddle Group (acting as joint controllers or processors) and who are based in countries inside of or outside of the EEA and provide IT and system administration services and undertake leadership reporting;

6.1.2 **External Third Parties:** including:

(a) service providers acting as processors based countries inside and outside of the EEA (including the United Kingdom and the United States of America) who provide IT and system administration services;

(b) professional advisers acting as processors including lawyers, bankers, auditors and insurers based in countries inside and outside of the EEA (including the United Kingdom) who provide consultancy, banking, legal, insurance and accounting services; and

(c) HM Revenue & Customs, regulators, law enforcement agencies and other authorities acting as processors based in countries inside and outside of the EEA (including the United Kingdom) that require reporting of processing activities in certain circumstances, including in order to comply with applicable law, a valid court order or another binding legal process. Although we dispute requests wherever appropriate, in some cases we may have to share your information with the regulators or law enforcement agencies. Where we consider it appropriate, and provided we are not prohibited from doing so by law or court order, we will attempt to notify you of these legal demands; and

6.1.3 third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy policy.

6.2 We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

7. INTERNATIONAL TRANSFERS

7.1 We share your personal data within the Muddle Group and with External Third Parties that may be based outside of the European Economic Area (EEA). This will involve transferring your data outside the EEA.

7.2 Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

7.2.1 generally, we will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission; or

7.2.2 where we need to transfer your personal data to countries that are not deemed to provide an adequate level of protection for personal data by the European Commission, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe (known as Standard Contractual Clauses or Model Contractual Clauses).

8. COOKIES

8.1 When using the Services via our desktop or mobile websites, we use the following categories of 'cookies' (small pieces of information sent by a web server to a web browser, which allows the server to uniquely identify the browser on each page) to collect information and store your preferences:

8.1.1 **strictly necessary cookies:** these cookies are essential to enable you to move around the website version of the Services, and use its features. Without these cookies, we cannot provide you with services you have asked for such as remembering your login details or settings information (including to collect and redeem rewards);

8.1.2 **performance cookies:** these cookies collect anonymous information about how you use our Services. For example, we may use Google Analytics cookies to help us understand how you have arrived at the Services and use the site, and to determine which areas we can improve (such as navigation, experience, and marketing). The data stored by these cookies

never shows personal details from which we (or anyone else) can determine your individual identity;

8.1.3 **functionality cookies:** these cookies remember choices you make, such as your preferred language, the country you visit the Services from, and search parameters relating to venues. We can then use these to provide you with a more tailored and individualised experience; making your use of the Services easier and more enjoyable. The information these cookies collect cannot track your browsing activity on other websites (only our Services), and may be anonymised;

8.1.4 **targeting cookies / advertising cookies:** these cookies allow us to make advertising more relevant to you and your interests, help measure the effectiveness of an advertising campaign and limit the number of times you see an individual advert. They are usually placed by third party advertising networks and collect information about your browsing habits (including remembering the websites you visit). For example, we may use third party companies to provide you with more personalised adverts when visiting other websites; and

8.1.5 **social media cookies:** these cookies allow you to share your use of the Services on social media (such as Facebook and Twitter). These cookies are not within our control, so please refer to the privacy policies of the respective social media platforms to find out more information about how those social media platforms' cookies work.

8.2 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 targeting cookies / advertising cookies or performance cookies.

8.3 You may 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 the Services.

9. DATA SECURITY

9.1 It is very important to us that we keep you, and your personal information, secure. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

9.2 We take a number of steps, and use a number of technical and organisational measures, to try to protect the personal information that you provide. These include:

9.2.1 where appropriate, using a Secure Socket Layer ("**SSL**") to encrypt the personal data that you send us; and

9.2.2 regularly monitoring our servers and IT systems for possible vulnerabilities and attacks.

9.3 We will notify you and any applicable regulator of a breach where we are legally required to do so.

10. HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

10.1 We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

10.2 To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

10.3 In some circumstances you can ask us to delete your data: see Section 11 below for further information.

10.4 In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

11. YOUR LEGAL RIGHTS

11.1 Your rights

11.1.1 Under certain circumstances, you have rights under data protection laws in relation to your personal data:

(a) **request access to your personal data:** commonly known as a "data subject access request", this enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it;

- (b) **request correction of your personal data:** this enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us;
- (c) **request erasure of your personal data:** this enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request;
- (d) **object to processing of your personal data:** this applies where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms;
- (e) **request restriction of processing your personal data:** this enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - (i) if you want us to establish the data's accuracy;
 - (ii) where our use of the data is unlawful but you do not want us to erase it;
 - (iii) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; and
 - (iv) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it;
- (f) **request transfer of your personal data:** we will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you; and
- (g) **withdraw consent:** this allows you to withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide Services (in whole or in part) to you.

11.1.2 Most of the rights above can be exercised via your profile page in our mobile applications (whether iOS, Android or otherwise). To the extent that you cannot exercise your rights via our mobile applications, please contact us using the details at Section 2.3 above.

11.2 No fee usually required

11.2.1 You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

11.3 What we may need from you

11.3.1 We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

11.3.2 We may also contact you to ask you for further information in relation to your request to speed up our response.

11.4 Time limit to respond

11.4.1 We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you of how long we expect it will take to respond to your request and will keep you updated.

12. DELETING YOUR ACCOUNT

- 12.1 You may close your account at any time via the profile page in our mobile applications (whether iOS, Android or otherwise).
- 12.2 Please note that if you close your account, we will retain certain information (in accordance with the terms of this Privacy Policy) associated with your account as required for fraud prevention, record keeping, to enforce our Terms of Use [\[LINK\]](#), to take actions that we deem necessary to protect the integrity of our Services or other users or to take actions as permitted or required by applicable law.
- 12.3 If information has been shared with third parties (as set out in this Privacy Policy), the retention of your information by those third parties will be subject to their privacy policies.
- 13. NO RIGHTS OF THIRD PARTIES**
- 13.1 This Privacy Policy does not create any rights that benefit, or are enforceable by, third parties.