

# DOOPLY

## PRIVACY POLICY

### 1. Introduction

- 1.1 We are committed to safeguarding the privacy of our users. This policy is designed to ensure that we safely handle your personal data in accordance with relevant regulations and legislation such as Data Protection Act 1998 and EU General Data Protection Regulations 2018 (the “**Data Protection Regulations**”).
- 1.2 This policy applies in those cases where we act as a data controller for the personal data of our platform visitors and service users. This means those cases where we can decide the purposes and method of processing your personal data.
- 1.3 By using our platform, you are agreeing to the terms of this policy.
- 1.4 These privacy rules explain what data we may collect from you, what we will do with that data and explains how you can limit the publication of your information and how you can choose whether or not you would like to receive direct marketing communications.
- 1.5 In this policy, "we", "us" and "our" refer to Dooply Technologies Limited. Further details about us can be found below, in section 10 of this Privacy Policy.
- 1.6 We reserve the right to update and make changes to this Privacy Policy from time to time. You should check back regularly to ensure that you are up to date with any changes to this policy. Any changes posted will have effect from the date of such posting.

### 2. How we use your personal data

- 2.1 In this Section 2 we set out:
  - (a) the general categories of personal data that we may process;
  - (b) the purposes for which we may process personal data; and
  - (c) the legal basis of the processing in each case.
- 2.2 We may process data about your use of our platform and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and platform navigation paths, as well as information about the timing, frequency and pattern of your platform or service use. The source of the usage data is our analytics tracking system. This usage data may be processed for the purposes of analysing the use of the platform and services. The legal basis for this processing is either your specific consent or where we are not legally required to ask for consent, we

may process this data for our legitimate interests, namely monitoring and improving our platform and services.

- 2.3 We may process your account data ("**account data**"). The account data may include your name, email address, contact phone number and postal address. The account data may be processed for the purposes of operating our platform, providing our services, ensuring the security of our platform and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is either your specific consent or where we are not legally required to ask for consent, we may process this data for our legitimate interests, namely monitoring and improving our platform and services.
- 2.4 We may process your information included in your personal profile on our platform ("**profile data**"). The profile data may include your name, address, telephone number, email address, profile pictures, gender, date of birth, educational details and employment details. The profile data may be processed for the purposes of enabling and monitoring your use of our platform and services. You specifically permit us to publish your profile data and send it to third parties who may be interested in engaging you to provide marketing services. The legal basis for this processing is either your specific consent or where we are not legally required to ask for consent, we may process this data for our legitimate interests, namely monitoring and improving our platform and services and fulfilling the terms of our agreement with you.
- 2.5 We may process information relating to transactions, including purchases of goods and services that you enter into with us and/or through our platform ("**transaction data**"). The transaction data may include your contact details, your card details and the transaction details. The transaction data may be processed for the purpose of supplying goods or services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely our interest in the proper administration of our platform and business.
- 2.6 We may process any of your personal data identified in this policy where necessary for administrative purposes including in the exercise or defence of legal claims. The legal basis for this processing is our legitimate interests, namely for administrative record keeping, processing transactions and maintaining business records or for the protection and assertion of our legal rights.
- 2.7 If you supply any other person's personal data to us, you must do so only if you have the authority of such person to do so and you must comply with any obligations imposed upon you under the Data Protection Regulations.

### **3. Providing your personal data to others**

- 3.1 We may disclose your personal data to any member of our group of companies (this means our subsidiaries, our holding company and its subsidiaries) insofar as reasonably necessary for the purposes, and on the legal bases, set out in this policy.
- 3.2 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or to exercise or defend legal claims.
- 3.3 We may pass your personal information to credit reference agencies or other agencies that provide services to verify your identity or for any other checks or searches required by legislation or our regulators relating to money laundering. These agencies may keep a record of any search that they do.
- 3.4 If you carry out financial transactions through our platform, these services will be handled by our payment services providers. We share transaction data with our payment services providers to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds.
- 3.5 We may outsource or contract the provision of IT services to third parties. If we do, those third parties may hold and process your personal data. In these circumstances, we will require that the IT supplier only processes your personal data for us, as directed by us, and in accordance with the Data Protection Regulations.
- 3.6 If we sell all or part of our business, we may pass your personal data to the purchaser. In these circumstances, we will require the purchaser to contact you after completion of the sale to inform you of the identity of the purchaser.
- 3.7 In addition to the specific disclosures of personal data set out in this Section 3, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your legal interests or the legal interests of another person.

#### **4. International transfers of your personal data**

- 4.1 In this Section 4, we provide information about the circumstances in which your personal data may be transferred to countries outside the European Economic Area (EEA).
- 4.2 Unless such transfer is made with your consent, or is required in order to fulfil the terms of any services requested from us, we will not transfer any of your personal data to any country outside the EEA unless such transfer is to an organisation which provides adequate safeguards in compliance with the Data Protection Regulations.

4.3 You acknowledge that personal data that you submit for publication through our platform or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

## **5. Retaining and deleting personal data**

5.1 This Section 5 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

5.2 Personal data that we process for any purpose shall not be kept for longer than is necessary for that purpose. This means that unless there is a good reason to do so we won't keep your personal data more than 6 years after our business relationship has ended.

5.3 Notwithstanding the other provisions of this Section 5, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your legal interests or the legal interests of another person.

## **6. Amendments**

6.1 We may update this policy from time to time by publishing a new version on our platform.

6.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

6.3 We may notify you of changes to this policy by email or through the private messaging system on our platform.

## **7. Your rights**

7.1 In this Section 7, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

7.2 Your principal rights under data protection law are:

- (a) the right to access;
- (b) the right to rectification;
- (c) the right to erasure;
- (d) the right to restrict processing;
- (e) the right to object to processing;

- (f) the right to data portability;
- (g) the right to complain to a supervisory authority; and
- (h) the right to withdraw consent.

7.3 You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data, as described below (clause 7.13).

7.4 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

7.5 In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.

7.6 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

7.7 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which

override your interests, rights and freedoms, or the processing is for the establishment, exercise or defense of legal claims.

- 7.8 You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.
- 7.9 You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.
- 7.10 To the extent that the legal basis for our processing of your personal data is:
- (a) consent; or
  - (b) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract,

and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

- 7.11 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.
- 7.12 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.
- 7.13 You may request that we provide you with any personal information we hold about you. Provision of this information will be subject to the supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address).

## **8. About cookies**

- 8.1 A cookie is a small file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser asking permission to be placed on your computer's hard drive. The file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web

applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

- 8.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.
- 8.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

## **9. Cookies that we use**

- 9.1 We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our services in order to tailor them to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.
- 9.2 Overall, cookies help us provide you with a better experience, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.
- 9.3 You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of our services.
- 9.4 We may use Google Analytics to analyse the use of our platform. Google Analytics gathers information about platform use by means of cookies. The information gathered relating to our platform is used to create reports about the use of our platform. Google's privacy policy can be found at the following web address: <https://www.google.com/policies/privacy/>.

## **10. Our details**

- 10.1 This website is owned and operated by Dooply Technologies Limited.
- 10.2 Our registered office address is 15C Sussex Heights, Brighton, UK, BN1 2FR and our company registration number is 11063464.
- 10.3 You can contact us:
  - (a) by post, to the postal address given above; or
  - (b) by email, using the email address published on our platform from time to time.