

# SITCKERRIDE LIMITED PRIVACY POLICY

Version of 18 November 2016

## 1. PURPOSE OF OUR POLICY

- 1.1. StickerRide Limited (Company Number 10025101) of 11 Old Jewry, 7<sup>th</sup> Floor, London, EC2R 8DU, United Kingdom (**StickerRide, we, us or our**) provides the services offered on the StickerHunt mobile application (**Application**).
- 1.2. For the purposes of the *Data Protection Act 1998* (**Act**), we are the data controller.
- 1.3. We have adopted this Privacy Policy to ensure that we have standards in place to protect the data that we collect about users of the Application (**Users**) that is necessary and incidental to:
  - (a) providing services that we offer through the Application;
  - (b) providing data analytics to our clients relating to their campaign(s); and
  - (c) the normal day-to-day operations of our business.
- 1.4. By publishing this Privacy Policy we aim to make it easy for our Users, clients and the public to understand what data we collect and store, why we do so, how we receive and/or obtain that information, and the rights a User has with respect to their data in our possession.

## 2. WHO AND WHAT THIS POLICY APPLIES TO

- 2.1. We handle data in our own right and also for and on behalf of our clients and Users.
- 2.2. Our Privacy Policy does not apply to information we collect about businesses or companies, however it does apply to information about the people in those businesses or companies which we store.
- 2.3. The Privacy Policy applies to all forms of information, physical and digital, whether collected or stored electronically or in hardcopy.
- 2.4. If, at any time, a User provides data or other information about someone other than himself or herself, the User warrants that they have that person's consent to provide such information for the purpose specified.

## 3. THE INFORMATION WE COLLECT

- 3.1. In the course of business it is necessary for us to collect data on Users. This information allows us to identify who the User is for the purposes of our business, to share data when asked of us, to contact the User in the ordinary course of business and to transact with the User. Without limitation, the type of information we may collect is:
  - (a) **Personal Information.** We may collect personal details such as a User's name, address, address, date of birth, nationality and other information that allows us to identify who the User is;

- (b) **Contact Information.** We may collect information such as a User's email address, telephone, residential, business and postal address and other information that allows us to contact the User;
  - (c) **Financial Information.** We may collect financial information related to a User such as any bank or credit card details used to transact with us and other information that allows us to transact with the User and/or provide them with our services;
  - (d) **Application Usage Data.** We may collect information about the User's use of the Application such as distance travelled, time of day, date and duration of journeys and routes taken;
  - (e) **Location Information.** When you use the Application, we may collect and process information about your actual location. We use various technologies to determine location, including IP address and GPS; and
  - (f) **Information a User sends us.** We may collect other personal information that a User sends us, or that is sent to us by others about the User's activities, including pictures, videos and activities with our partners (such as Facebook, Instagram, Periscope, LinkedIn, VKontakte, Odnoklassniki or Twitter).
- 3.2. We may collect other similar information and personal data about the User, which we will maintain in accordance with this Privacy Policy.
- 3.3. We may also collect non-data about the User such as information regarding their mobile device, network and browser.

#### **4. HOW INFORMATION IS COLLECTED**

- 4.1. Most information will be collected in association with the User's use of the Application or generally dealing with us. However, we may also receive data from other sources such as advertising, a User's own promotions, public records, mailing lists, contractors, staff, recruitment agencies and our business partners (such as Facebook, Instagram, Periscope, LinkedIn, VKontakte, Odnoklassniki or Twitter). In particular, information is likely to be collected as follows:
- (a) **Registrations/Subscriptions.** When a User registers, subscribes or other process whereby they enter data details or grant access to information in order to receive or access something, including a transaction or services;
  - (b) **Accounts/Memberships.** When a User submits their details to open an account and/or become a member with us;
  - (c) **Contact/Supply/Access.** When a User supplies us with services, or contacts us in any way;
  - (d) **Pixel Tags.** Pixel tags enable us to send email messages in a format Users can read and they tell us whether mail has been opened.
- 4.2. As there are many circumstances in which we may collect information both electronically and physically, we will endeavour to ensure that a User is always aware of when their data is being collected.
- 4.3. We may also collect anonymous data such as traffic and IP addresses which may be used and shared on an aggregated and anonymous basis.

## **5. HOW DATA IS STORED**

- 5.1. The data that we collect from you will be stored within the European Economic Area (EEA) but may be transferred to, and stored at, a destination outside the EEA. It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services.
- 5.2. By submitting your personal data, you agree to this transfer, storing or processing.

## **6. WHEN DATA IS USED**

- 6.1. In general, the primary principle is that we will not use any data other than for the purpose for which it was collected other than with the permission of the User. The purpose of collection is determined by the circumstances in which the information was collected and/or submitted.
- 6.2. We will retain data for the period necessary to fulfil the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.
- 6.3. Information is used to enable us to operate our business, especially as it relates to a User. This may include:
  - (a) the provision of services between a User and us;
  - (b) delivering campaigns and providing other services to our clients;
  - (c) verifying a User's identity;
  - (d) communicating with a User about:
    - i. their relationship with us;
    - ii. our services;
    - iii. our own marketing and promotions to customers and prospects;
    - iv. competitions, surveys and questionnaires;
  - (e) investigating any complaints about or made by a User, or if we have reason to suspect that a User is in breach of any of our terms and conditions or that a User is or has been otherwise engaged in any unlawful activity; and/or
  - (f) as required or permitted by any law (including the Act).
- 6.4. If you publicly post about SitckerHunt, or communicate directly with us, on a social media website, we may collect and process the data contained in such posts or in your public profile for the purpose of addressing any customer service requests you may have and to monitor and influence public opinion of SitckerHunt.

## **7. WHEN DATA IS DISCLOSED**

- 7.1. It may be necessary for us to disclose a User's data to third parties in a manner compliant with the Act in the course of our business, such as clients who engage our services for the purpose of campaigns.

- 7.2. We will not disclose or sell a User's data to unrelated third parties under any circumstances unless we employ other companies to perform tasks on our behalf and we need to share your information with them to provide products and services to you.
- 7.3. There are some circumstances in which we must disclose a User's information:
- (a) where we reasonably believe that a User may be engaged in fraudulent, deceptive or unlawful activity that a governmental authority should be made aware of;
  - (b) as required by any law (including the Act) including court orders; and/or
  - (c) in order to sell our business (as we may transfer data to a new owner).
- 7.4. We will not disclose a User's data to any entity outside of the United Kingdom (save for our group companies) that is in a jurisdiction that does not have a similar regime to the Act or an implemented and enforceable privacy policy similar to this Privacy Policy. We will take reasonable steps to ensure that any disclosure to an entity outside of the United Kingdom will not be made until that entity has agreed in writing with us to safeguard data as we do.
- 7.5. We may partner with or utilise third-party service providers (such as Gmail from Google, Inc) to communicate with a User and to store contact details about a User. These service providers may be located outside the United Kingdom, including the United States of America.

## **8. THIRD PARTY ACCOUNTS**

- 8.1. We may link your account with a third party (such as Facebook, Instagram, Periscope, LinkedIn, VKontakte, Odnoklassniki or Twitter) to our services to enable certain functionality, which allows us to obtain information from those accounts (including your profile picture, friends or contacts).
- 8.2. The information we may obtain from those services often depends on your settings or their privacy policies.

## **9. COOKIE POLICY**

- 9.1. Our website may use cookies to distinguish you from other Users. This helps us to provide you with a good experience when you use and also allows us to improve our website. By continuing to browse the site, you are agreeing to our use of cookies.
- 9.2. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive. You 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.

## **10. OPTING "IN" OR "OUT"**

- 10.1. A User may opt to not have us collect their data and communicate with them. This may prevent us from offering them some or all of our services and may terminate their access to some or all of the services they access with or through us. They will be aware of this when:

- (a) **Opt In.** Where relevant, the User will have the right to choose to have information collected and/or receive information from us; or
  - (b) **Opt Out.** Where relevant, the User will have the right to choose to exclude himself or herself from some or all collection of information and/or receiving information from us.
- 10.2. If a User believes that they have received information from us that they did not opt in or out to receive, they should contact us on the details below.

## **11. THE SAFETY & SECURITY OF DATA**

- 11.1. We will take all reasonable precautions to protect a User's data from unauthorised access. This includes appropriately securing our physical facilities and electronic networks.
- 11.2. The security of online transactions and the security of communications sent by electronic means or by post cannot be guaranteed. Each User that provides information to us via the internet or by post does so at their own risk. We cannot accept responsibility for misuse or loss of, or unauthorised access to, data where the security of information is not within our control.
- 11.3. We are not responsible for the privacy or security practices of any third party (including third parties that we are permitted to disclose a User's data to in accordance with this policy or any applicable laws). The collection and use of a User's information by such third parties may be subject to separate privacy and security policies.
- 11.4. If a User suspects any misuse or loss of, or unauthorised access to, their data, they should let us know immediately.
- 11.5. We are not liable for any loss, damage or claim arising out of another person's use of the data where we were authorised to provide that person with the data.

## **12. HOW TO ACCESS AND/OR UPDATE INFORMATION**

- 12.1. The Act gives you the right to request from us the data that we have about you.
- 12.2. If a User cannot update his or her own information, we will correct any errors in the data we hold about a User within 7 days of receiving written notice from them about those errors.
- 12.3. It is a User's responsibility to provide us with accurate and truthful data. We cannot be liable for any information that is provided to us that is incorrect.
- 12.4. We may charge a User a reasonable fee for our costs incurred in meeting any of their requests to disclose the data we hold about them.

## **13. COMPLAINTS AND DISPUTES**

- 13.1. If a User has a complaint about our handling of their data, they should address their complaint in writing to the details below.
- 13.2. If we have a dispute regarding a User's data, we both must first attempt to resolve the issue directly between us.

- 13.3. If we become aware of any unauthorised access to a User's data we will inform them at the earliest practical opportunity once we have established what was accessed and how it was accessed.

#### **14. ADDITIONS TO THIS POLICY**

- 14.1. If we decide to change this Privacy Policy, we will post the changes on our website at [www.sitckerhunt.com/privacy](http://www.sitckerhunt.com/privacy). It is your responsibility to refer back to this Privacy Policy to review any amendments.
- 14.2. We may do things in addition to what is stated in this Privacy Policy to comply with the Act and nothing in this Privacy Policy shall deem us to have not complied with the Act.

#### **15. CONTACTING US**

- 15.1. All correspondence with regards to privacy should be addressed to:

The Data Controller  
SitckerRide Ltd  
[#info@SitckerHunt.com](mailto:info@SitckerHunt.com)

You may contact us by email in the first instance.