

Privacy Policy

Snapsaver Ltd (**we**) are committed to protecting your personal data and respecting your privacy. Under data protection laws, we are required to provide you with certain information about who we are, how we process your personal data and for what purposes, and your rights in relation to your personal data.

Before installation of this App, you must tick the box to indicate your consent to our processing of your personal data (including your name, contact details, financial and device information) as described in this policy.

This policy (together with our end-user licence agreement as set out at <https://live-admin.snapsaver.co.uk/api/terms-and-conditions/apple> (**EULA**) applies to your use of:

- Snapsaver mobile application software (**App**) available on the App Store or Google Play (**App Site**), once you have downloaded a copy of the App onto your mobile telephone or handheld device (**Device**).
- Any of the services accessible through the App (**Services**) that are available on the App.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. This App is not intended for children and we do not knowingly collect data relating to children. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

Important information and who we are

We are the data controller and we are responsible for your personal data (collectively referred to as "Snapsaver", "we", "us" or "our" in this policy).

If you have any questions about this privacy policy, please contact us as follows:

- Full name of legal entity: Snapsaver Ltd
- Email address: info@snapsaver.co.uk
- Postal address: 65 Village Heights, Gateshead, Tyne & Wear, NE8 1PW

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.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. It may change and if it does, these changes will be notified to you when you next start the App. The new policy may be displayed on-screen and you may be required to read and accept the changes to continue your use of the App or the Services.

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 our relationship with you by contacting us at: info@snapsaver.co.uk.

Third party links

The App may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. Please note that these websites and any services that may be accessible through them have their own privacy policies and that we do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites or services.

Please check these policies before you submit any personal data to these websites or use these services.

The data we collect about you

We may collect, use, store and transfer different kinds of personal data about you as follows:

- **Contact Data:** first name, last name and email address.
- **Financial Data:** bank account, payment card details and details about payments to and from you and details of membership purchases. All payments are directed through the App Site.
- **Device Data:** includes the type of mobile device you use, a unique device identifier (for example, your Device's IMEI number, the MAC address of the Device's wireless network interface, or the mobile phone number used by the Device), mobile network information, your mobile operating system, the type of mobile browser you use, time zone setting.
- **Usage Data:** includes details of your use of our App including, but not limited to, traffic data and other communication data, whether this is required for our own billing purposes or otherwise.
- **Location Data:** includes your current location disclosed by GPS technology.

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 App 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.

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). Nor do we collect any information about criminal convictions and offences.

How is your personal data collected?

We will collect and process the following data about you:

- **Information you give us.** This is information you consent to giving us about you by filling in forms on the App Site or by corresponding with us (for example, by email or chat). It includes information you provide when you download the App, subscribe to any of our Services, make a membership purchase, share data via an App's social media functions, enter a competition, promotion or survey and when you report a problem with an App or our Services. If you contact us, we will keep a record of that correspondence.
- **Information we collect about you and your device.** Each time you use the App we will automatically collect personal data including Device, Content and Usage Data. We collect this data using Google Analytics.
- **Location Data.** We also use GPS technology to determine your current location. Some of our location-enabled Services require your personal data for the feature to work. You can withdraw your consent at any time by disabling Location Data in your settings, but this will render the App ineffective, and you will need to turn your location back on before claiming a discount or discovering offers.

- **Information we receive from other sources, including third parties and publicly available sources.**
 - Device Data from analytics providers such as Google based outside the EU;
 - Contact and Financial Data from providers of technical, payment and delivery services based outside the EU, for example Apple or Google at the point of transaction when you make an membership purchase; or
 - Contact Data from Facebook when you log into your account, which you authorise directly with Facebook, who are based outside the EU.

How we use your personal data

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

- Where you have consented before the processing.
- Where we need to perform a contract we are about to enter or have entered with you.
- 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.
- Where we need to comply with a legal or regulatory obligation.

We will only send you direct marketing communications by email or text if we have your consent. You have the right to withdraw that consent at any time by contacting us.

Purposes for which we will use your personal data

Purpose/activity	Type of data	Lawful basis for processing
To install the App and register you as a new App user	Contact Device	Your consent
To process membership purchases and deliver Services including managing payments and collecting money owed to us	Contact Financial Device Location	Your consent Performance of a contract with you Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you including notifying you of changes to the App or any Services	Contact Financial	Your consent Performance of a contract with you Necessary for our legitimate interests (to keep records updated and to analyse how customers use our products/ Services) Necessary to comply with legal obligations (to inform you of any changes to our terms and conditions)
To communicate with you by email, if required or requested	Contact	Your consent Performance of a contract with you
Identifying your location	Device Location	Performance of a contract with you Your consent
To enable you to participate in a prize draw, competition or complete a survey	Contact Device	Your consent Performance of a contract with you Necessary for our legitimate interests (to analyse how customers use our products/Services and to develop them and grow our business)
To administer and protect our business and this App including troubleshooting, data analysis and system testing	Contact Usage Device	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security)
To deliver content and advertisements to you	Contact Device	Consent

<p>To make recommendations to you about goods or services which may interest you</p> <p>To measure and analyse the effectiveness of the advertising we serve you</p> <p>To monitor trends so we can improve the App</p>	<p>Location</p>	<p>Necessary for our legitimate interests (to develop our products/Services and grow our business)</p>
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Disclosures of your personal data

When you consent to providing us with your personal data, we will also ask you for your consent to share your personal data with third parties, such as our partnering businesses who offer discounts on our app for the purposes set out in the table above.

Our partnering businesses change constantly, and often any information we share with them will be anonymised.

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.

International Transfers

We do not transfer your personal data outside the European Economic Area (**EEA**), however, Facebook and Google are based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA. Both Facebook and Google are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US.

Security

All information you provide to us is stored on our secure servers. Any payment transactions carried out, are done so by the relevant app store. Where we have given you (or where you have chosen) a password that enables you to access certain parts of the App, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Once we have received your information, we will use strict procedures and security features to try to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator when we are legally required to do so.

Data Retention

We take data protection seriously and take steps to minimise, anonymise or delete information we hold to ensure your data is secure. If you do not use the App for a period of twelve months (or more) then we may treat the account as expired and some of your personal data may be deleted. By law we have to keep basic information about our customers (including Contact and Financial Data) for six years after they cease being customers for tax purposes. 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.

You can ask us to delete your data in some circumstances: see '*Your legal rights* below' for further information.

Your legal rights

You have the right to:

- **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.
- **Request correction** of the personal data that we hold about you. 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.
- **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.
- **Object to the processing** of your personal data 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.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - a) if you want us to establish the data's accuracy;
 - b) where our use of the data is unlawful but you do not want us to erase it;
 - c) 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; or
 - d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. 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.
- **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 certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.