

## **eyetime International Limited Privacy Policy**

The App is owned and operated by eyetime International Limited, a company registered in England and Wales under number 11138453 with its registered office at 3<sup>rd</sup> Floor, 40 Bank Street, London E14 5NR, United Kingdom, ("eyetime", "we", "our", and "us").

This policy (together with our user terms and conditions) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

For the purpose of data protection laws, eyetime International Limited is registered with the Information Commissioner's Office.

### **INFORMATION WE MAY COLLECT FROM YOU**

We may collect and process the following data about you:

- Information you give us when you register to use the App, make a payment on the App, and when you report a problem with the App. The information you give us may include your name, address, e-mail address and phone number, and personal description.
- Location data (where activated and you have agreed to this on your mobile device).
- If you provide feedback in relation to your use of the App, we will process such information for analysis and statistical purposes.
- If you contact us, we may keep a record of that correspondence.
- With regard to your use of the App we will automatically collect information about your mobile device, including, where available, your device ID, and operating system, for system administration and to analyse statistical data about our users' actions and patterns, and does not identify any individual.

### **PAYMENT INFORMATION**

In order to make purchases using the App, you will need to enter your payment information. Payment processing services are provided by a third party payment processor. By inputting your debit or credit card information, you agree to use of that information by the third party payment processor for the purpose of paying your bill and processing your payment.

### **USES MADE OF THE INFORMATION**

We use information held about you in the following ways:

Information you give to us. We will use this information:

- to carry out our obligations arising from the contract entered into between you and us and to provide you with the information, products and services that you request from us;
- to provide you with information about other services that we offer that are similar to those that you have already purchased or enquired about;
- to notify you about changes to our service;
- to ensure that content from the App is presented in the most effective manner for you and for your device.

Information we collect about you. We will use this information:

- to administer the App and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve the App to ensure that content is presented in the most effective manner for you and for your device; and
- as part of our efforts to keep the App safe and secure.

#### **DISCLOSURE OF YOUR INFORMATION**

We will share your personal information with the payment services provider in order to carry out the payment for the goods or services or digital content which you have purchased on the App.

We may also disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If eyetime or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation.

#### **WEB TRACKING AND CONTENT MODERATION**

We collect personal information about our users across different websites when you use our app. To do this, we use several common tracking tools. These may include browser cookies. We may also use web beacons, flash cookies, and similar technologies. We use tracking tools to improve our app and to observe your behaviours and browsing activities over time across multiple websites or other platforms as well as to better understand the interests of our customers. In your privacy settings you have the possibility to control your data collection by opting out from the analytic data collection.

In order to comply with law and to ensure a safe environment in accordance with our community standards for our users we also use content moderation for our app.

#### **HOW LONG YOUR PERSONAL INFORMATION WILL BE KEPT**

We will hold your personal data (e.g. email, phone number, name, address) for the period we are required to retain this information by applicable UK tax law (currently 6 years)).

We will hold payment card details for so long as you continue to use the App. We will delete these details once the payment card expires or if you do not use the App for 12 months.

#### **COOKIES**

In order to improve the App, we may use small files commonly known as “cookies”. A cookie is a small amount of data which often includes a unique identifier that is sent to your mobile device from the App and is stored on your device’s hard drive.

A cookie records on your device information relating to your internet activity (such as whether you have visited our website before). The cookies we use on the App won't collect personally identifiable information about you and we won't disclose information stored in cookies that we place on your device to third parties.

We use cookies to distinguish you from other users of the App,. This helps us to provide you with a good experience when you use the App and also allows us to improve the App.

## **STORAGE OF YOUR PERSONAL DATA**

The data that we collect from you will be stored on our secure servers within the UK and the European Economic Area ("EEA").

Where we have given you (or where you have chosen) a password which 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.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to the App; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## **YOUR RIGHTS**

Under data protection laws, you have a number of important rights free of charge. In summary, those include rights to:

- access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address
- require us to correct any mistakes in your information which we hold
- require the erasure of personal information concerning you in certain situations
- receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- object at any time to processing of personal information concerning you for direct marketing
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- object in certain other situations to our continued processing of your personal information
- otherwise restrict our processing of your personal information in certain circumstances

If you would like to exercise any of those rights, please contact us as below. When contacting us, please let us have enough information to identify you (eg mobile phone number, user name, registration details), let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and let us know the information to which your request relates.

## **KEEPING YOUR PERSONAL INFORMATION SECURE**

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

## **HOW TO COMPLAIN**

We hope that we can resolve any query or concern you raise about our use of your information.

Data protection laws also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.

#### **CHANGES TO OUR PRIVACY POLICY**

Any changes we may make to our privacy policy in the future will be posted on this section of the App and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

#### **CONTACT**

Questions, comments and requests regarding this privacy policy should be sent by email to [support@eyetime.com](mailto:support@eyetime.com).

Last Updated: 18 May 2018