



# Privacy Policy

## 1. Introduction

1.1 We are committed to safeguarding the privacy of our website visitors; in this policy we explain how we will treat your personal data and information.

## 2. Collecting personal data and information

2.1 We may collect, store and use the following kinds of personal data and information:

- (a) information about your computer and about your visits to and use of this website (including your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths);
- (b) information that you provide to us when registering with our website (including your email address);
- (c) information that you provide when completing your profile on our website (including [your name, profile pictures, gender, date of birth, relationship status, interests and hobbies]);
- (d) information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters (including [your name and email address]);
- (e) information that you provide to us when using the services on our website, or that is generated in the course of the use of those services (including the timing, frequency and pattern of service use);
- (f) information that you post to our website for publication on the internet (including your user name, your profile pictures and the content of your posts);
- (g) information contained in or relating to any communication that you send to us or send through our website (including the communication content and metadata associated with the communication);
- (h) any other personal data and information that you choose to send to us

2.2 Before you disclose to us the personal data and information of another person, you must obtain that person's consent to both the disclosure and the processing of that personal data and information in accordance with this policy.

## 3. Using personal data and information

3.1 Personal data and information submitted to us through our website will be used for the purposes specified in this policy or on the relevant pages of the website.

3.2 We may use your personal data and information to:



- (a) administer our website and business;
- (b) send you email notifications that you have specifically requested;
- (c) send you our email newsletter, if you have requested it (you can inform us at any time if you no longer require the newsletter);
- (d) send you marketing communications relating to our business which we think may be of interest to you, by post or, where you have specifically agreed to this, by email or similar technology (you can inform us at any time if you no longer require marketing communications);
- (e) deal with enquiries and complaints made by or about you relating to our website;
- (f) keep our website secure and prevent fraud;
- (g) verify compliance with the terms and conditions governing the use of our website

3.3 If you submit personal data and information for publication on our website, we will publish and otherwise use that information in accordance with the licence you grant to us.

3.4 We will not, without your express consent, supply your personal data and information to any third party for the purpose of their or any other third party's direct marketing.

#### **4. Disclosing personal data and information**

4.1 We may disclose your personal data and information to any of our employees, officers, insurers, professional advisers, agents, suppliers or subcontractors insofar as reasonably necessary for the purposes set out in this policy.

4.2 We may disclose your personal data and information to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes set out in this policy.

4.3 We may disclose your personal data and information:

- (a) to the extent that we are required to do so by law;
- (b) in connection with any ongoing or prospective legal proceedings;
- (c) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk);
- (d) to the purchaser (or prospective purchaser) of any business or asset that we are (or are contemplating) selling; and
- (e) to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal data and information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal data and information.

4.4 Except as provided in this policy, we will not provide your personal data and information to third parties.



## **5. International data transfers**

5.1 Information that we collect may be stored and processed in and transferred between any of the countries in which we operate in order to enable us to use the information in accordance with this policy.

5.2 Information that we collect may be transferred to the following countries which do not have data protection laws equivalent to those in force in the European Union: the United States of America and India.

5.3 Personal data and information that you publish on our website or submit for publication on our website may be available, via the internet, around the world. We cannot prevent the use or misuse of such information by others.

5.4 You expressly agree to the transfers of personal data and information described in this Section 5.

## **6. Retaining personal data and information**

6.1 This Section 6 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 and information.

6.2 Personal data and information that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

6.3 Notwithstanding the other provisions of this Section 6, we will retain documents (including electronic documents) containing personal data:

- (a) to the extent that we are required to do so by law;
- (b) if we believe that the documents may be relevant to any ongoing or prospective legal proceedings; and
- (c) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).

## **7. Security of personal data and information**

7.1 We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal data and information.

7.2 We will store all the personal data and information you provide on our secure (password and firewall-protected) servers.

7.3 You acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

7.4 You are responsible for keeping the password you use for accessing our website confidential; we will not ask you for your password (except when you log in to our website).



## **8.Amendments**

- 8.1 We may update this policy from time to time by publishing a new version on our website.
- 8.2 You should check this page occasionally to ensure you are happy with any changes to this policy.
- 8.3 We may notify you of changes to this policy by email or through the private messaging system on our website.

## **9.Your rights**

9.1 You may instruct us to provide you with any personal data and information we hold about you; provision of such information will be subject to:

- (a) the payment of a fee (currently fixed at € 10); and
- (b) the supply of appropriate evidence of your identity (for this purpose, we will usually accept a officially certified photocopy of your passport plus an original copy of a utility bill showing your current address).

9.2 We may withhold personal data and information that you request to the extent permitted by law.

9.3 You may instruct us at any time not to process your personal data and information for marketing purposes.

9.4 In practice, you will usually either expressly agree in advance to our use of your personal data and information for marketing purposes, or we will provide you with an opportunity to opt out of the use of your personal data and information for marketing purposes.

## **10.Third party websites**

10.1 Our website includes hyperlinks to, and details of, third party websites.

10.2 We have no control over, and are not responsible for, the privacy policies and practices of third parties.

## **11.Updating information**

11.1 Please let us know if the personal data and information that we hold about you needs to be corrected or updated.

## **12. Our details**

12.1 This website is owned and operated by SpinApp.

12.2 We are based at Rue de l'Association 39, 1000 Brussels - BELGIUM.

12.3 You can contact us by writing to the business address given above, by using our website contact form, by email to [contact@spinapp.eu](mailto:contact@spinapp.eu) or by telephone on +32 (0) 2 734 02 48.