



## **Privacy Policy**

This Privacy Policy was last updated on the 5th June 2020

This Privacy Policy applies to your use of the Civic Dollars mobile application (the “Civic Dollars App”), any website operated by Civic Dollars (including <http://cividdollars.com>) (the “Civic Dollars Website(s)”) and the services we provide that are accessible via any of them (the “Services”). This Privacy Policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be stored and processed by us. Please note that you must be aged 16 years or older to use the Services. Please do not use the Services or provide us with any personal information if you are under 16 years of age.

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

From time to time, we may collect or ask you to provide personal information including (without limitation) the following: your name, mobile phone number, email address, IP address, unique device identifiers and other identification credentials, biographical details, photographs and/or payment information.

As part of the Services, we may provide functionality allowing you to login using your Facebook credentials and, when you elect to do this, you will be asked to allow the Civic Dollars App to access certain information associated with your Facebook account such as your name and email address.

Please note that, with your consent, we will collect information about your location and physical movements within an earning zone in order for the Civic Dollars App to function properly and monitor and verify forms of eligible activities. You may turn location monitoring on and off from time to time using the settings of your operating system of your mobile device but, if you disable this functionality, we will not be able to collect information relating to your activities and GPS/Cell-ID location which will prevent tracking and/or conversion of your activities into Civic Dollars.

We work with third parties from time to time (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers and credit reference agencies) who may provide to us information about you. This may include your purchase history from business partners who supply you with rewards made available via the Civic Dollars App.

### **USES MADE OF YOUR PERSONAL DATA**

We may use your personal data to:

- Provide the Services (using our own systems and those of appropriate third party service providers);
- Verify your physical movement and location within an earning zone and issue Civic Dollars on the basis of this verified data;
- Analyse the usage of, and improve, the Services;
- Communicate with you, including without limitation to inform you of updates to the Civic Dollars App, Civic Dollars Website(s), our Terms of Use and/or this Privacy Policy;
- Perform market and customer research;
- Market our services to you;
- Correct errors and problems with the Services;
- Investigate and/or prevent suspected fraud or other criminal activities;
- Operate the Civic Dollars Marketplace; and/or
- Investigate disputes between users.

Additionally, we and/or our trusted partners may contact you from time to time with offers that may interest you and/or to inform you of other products and services. Certain of your personal data may be shared with other users of the Civic Dollars App as part of the normal operation of the Services (for example your uploaded profile picture and biographical information will be accessible to all users, and we may publish your total verified activities, or other movement, during a particular period to other users from time to time). Further, we may, from time to time, expand or reduce our business which may involve the transfer of certain divisions or assets of our company to other parties, and the data we store and use, where relevant, may be transferred to such third parties. From time to time we may transfer the data we store and use to locations outside the European



Economic Area, some of which may have different data protection laws to the UK or the EU, or no data protection laws. In all such cases, we transmit such information only to entities that comply with this policy and applicable law.

Your personal data will be kept only for as long as is necessary. We take reasonable industry-standard care in keeping all our data secure and in preventing any unauthorised access or unlawful use of it. All personal data we store and process is handled strictly in accordance with applicable data protection legislation.

## **COOKIES**

We use cookies to distinguish you from other users of the Civic Dollars App and Civic Dollars Website(s) and obtain certain information about your usage and behaviour. A cookie is a small file of letters and numbers that we put on your computer when you use the Civic Dollars App or Civic Dollars Website(s). This helps us to provide you with a better experience when you use the Civic Dollars App or browse the Civic Dollars Website(s) and also allows us to improve the Services. We will use both persistent cookies, which could remain on your device until their expiration (which, in some cases, is up to 10 years), and session cookies, which are temporary files removed from your device once your browser is closed.

The types of cookies we may use include:

Analytical/Tracking Cookies, which allow us to recognise and count the number of visitors and analyse use of the Services, as well as to verify transactions; and

Advertising and Retargeting Cookies, which allow us to generate appropriate advertising directed to you on the Civic Dollars Website(s) as well as on the Civic Dollars App and other third-party websites.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies. You may block cookies by activating the appropriate setting on your browser but, if you do so, you may not be able to use all functionalities of the Services.

We use a number of industry-standard data analytics tools, such as Google Analytics and Facebook Analytics. These collect certain information about you, such as your device's IP address and browsing and usage behaviour and are used to allow us to track and monitor the traffic visiting the Civic Dollars App and Civic Dollars Website(s).

## **YOUR RIGHTS**

You have the right to change your personal information we hold about you. You can exercise your right by accessing your Account information in our app.

You have the right to ask us about the personal information we hold about you and to request a copy of your personal information. You can exercise your right to access this information by emailing [privacy@cividdollars.com](mailto:privacy@cividdollars.com), with the subject 'data access request'.

You have the right to delete your account and any personal information we hold on you. You can exercise your right to delete your Civic Dollars account and the personal information attached to it yourself, by triggering an account deletion within the Civic Dollars app.

Additionally, information about concerns or complaints may be made to the Information Commissioners Office in the UK via <https://ico.org.uk/concerns>.



### **CHANGES TO THIS PRIVACY POLICY**

We reserve the right to change this Privacy Policy at any time. Any such changes we may make to this Privacy Policy will be posted on the Civic Dollars App and Civic Dollars Website(s), and may be emailed to you. Please check the Privacy Policy available on the Civic Dollars App and Civic Dollars Website(s) from time to time. In the event of any such change, by continuing to use the Civic Dollars App or Civic Dollars Website(s) you agree to the relevant change.

### **CONTACT**

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to [privacy@CivicDollars.com](mailto:privacy@CivicDollars.com) with subject line "enquiry".