

BUMPLY®: Privacy Policy

Introduction

The Bumply app (the **App**) is owned and operated by Bumply Ltd a company registered in England and Wales with company number 10107628, registered office 42-44 Nottingham Road, Mansfield, Notts NG18 1BL (**Bumply, we, us**). By using the App you agree to be bound by this privacy policy (the **Privacy Policy**) and the terms of use accessible on the App (the **Terms**). This Privacy Policy and the Terms affect your legal rights and obligations so please read them carefully. If you do not agree to be bound by this Privacy Policy and/or the Terms, do not use the App. If you have any questions, you can contact us on support @bumply.co.uk.

We reserve the right to update this Privacy Policy from time to time at our discretion. If we do so, and the changes substantially affect your rights or obligations, we shall notify you if we have your email address. Otherwise, you are responsible for regularly reviewing this Privacy Policy so that you are aware of any changes to it.

Collecting Personal Data

By 'personal data' we mean identifiable information about you, such as your name, email address, telephone number and your IP address.

Personal data also includes information about your location at any time and 'special categories' of personal data such as 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. We do not actively seek nor ask you to provide special categories of personal data to us, but we acknowledge that you may do so within your interactions with the App.

We are the controller of the personal data provided to us or collected by us.

We will collect your personal data through your use of the App, either automatically when you register, or as provided by you through your interactions with the App. In particular, we will collect your personal data that you provide to us when you:

- register to download the App;
- engage with us on social media;
- provide a review or testimonial to us;
- respond to a survey;
- upload content to the App;
- otherwise contact us including with queries, comments or complaints.

All personal data that you provide to Bumply on registration must be true, complete and accurate. At our request, you shall promptly provide evidence of your identity.

You agree that if any information provided by you is untrue, inaccurate, not current or incomplete or if we suspect that any information relates to a third party and not you, we may terminate your account without notice and without liability to you.

When you use the App, we automatically collect and store information about your mobile device and your activities. This information could include (a) technical information about your

mobile device such as type of device, web browser or operating system; (b) your preferences and settings such as time zone and language; and (c) how long you used the App and which services and features you used.

We also process information about the country where your mobile device is located while you are using the App, but we do not store that information.

When you contact us by email or post, we may keep a record of the correspondence and we may also record any telephone call we have with you.

You may of course from time to time provide further information to us that relates to you and we shall process all such personal data in accordance with this Privacy Policy.

Lawful use of your personal data

We will only use your personal data where we have a lawful basis to do so. The lawful purposes that we rely on under this Privacy Policy are: consent (where you choose to provide it), performance of our contract with you; legal compliance; and legitimate interests. When we refer to legitimate interests we mean our legitimate business interests in the normal running of our business which do not materially impact your rights, freedom or interests.

We use your personal data to allow you to access the App in accordance with our Terms of Services.

We use your personal data to comply with any legal obligations, demands or requirements, for example, as part of anti-money laundering processes or to protect a third party's rights, property, or safety.

We may also use your personal data for our legitimate interests including to improve the App and in connection with, or during negotiations of, any merger, sale of assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or into another company.

We may also use your personal data for our legitimate interests, including dealing with any customer services you require, for audit purposes and to contact you about changes to this Privacy Policy.

Who do we share your data with?

Some of the personal data in your profile is available to other users of the App - your name plus the following details if you have included such details in your profile: age, due date, general location, interests and favourite place.. We do not share with other users your email address or details of any Facebook account you may have. You can allow other users to access more of your personal data if you choose to do so under the App, and you acknowledge that all interactions on the App are accessible by the recipient.

For our legitimate interests, we may share your personal data with any service providers, sub-contractors and agents that we may appoint to perform functions on our behalf and in accordance with our instructions, including including Twilio, Inc who manage the direct

message facility on the App, customer service providers, IT service providers, accountants, auditors and lawyers. We shall provide our service providers, sub-contractors and agents only with such of your personal data as they need to provide the service for us and if we stop using their services, we shall request that they delete your personal data or make it anonymous within their systems.

Where we hold and process your personal data

Some or all of your personal data may be stored or transferred outside of the European Economic Area (the **EEA**) for any reason, including for example, if our email server is located in a country outside the EEA or if any of our service providers are based outside of the EEA. In particular, Twilio, Inc who manage the direct message facility on the App, are located outside of the EEA.

Where your personal data is transferred outside the EEA, it will only be transferred to countries that have been identified as providing adequate protection for personal data), or to a third party where we have approved transfer mechanisms in place to protect your personal data.

Marketing

We may send to you emails about our products and services for our legitimate interests. You can choose to no longer receive emails from us by notifying us at support@bumply.co.uk or clicking unsubscribe from an email. We shall therefore retain your personal data in our records for marketing purposes until you notify us that you no longer wish to receive emails from us.

Mobile device IDs

We use and store your mobile device IDs, which is the unique identifier assigned to a device by the manufacturer, to recognize you. Device IDs cannot be deleted.

We also use Google Analytics to monitor how the App is used. Google Analytics collects information anonymously and generates reports detailing information such as the number of visits to the App, where visitors generally came from, how long they stayed on the system, and which pages they visited. Google Analytics places several persistent cookies on your device's hard drive. These do not collect any personal data. If you do not agree to this you can disable persistent cookies in your browser. This will prevent Google Analytics from logging your visits. For more information on Google Analytics, see [Google Analytics](#)

We also use social media buttons and/or plugins on this site that allow you to connect with your social network in various ways. For these to work the relevant social media sites (Twitter, Facebook and Google +) will set cookies which may be used to enhance your profile on their site or contribute to the data they hold for various purposes outlined in their respective privacy policies.

Security

We shall process your personal data in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage. The technology that we use and the security policies which we have implemented are intended to safeguard your information from unauthorised

access and improper use. However, no system can be completely secure. Therefore, although we take steps to secure your information, we do not promise that your personal data or other content that you upload to the system will always remain secure.

Your rights

You have a number of rights under applicable law. To exercise any of these rights, please at support@bumply.co.uk

You have the right to obtain from us a copy of the personal data that we hold for you or request that we transfer your personal data to another service provider.

You can also require us to correct errors in the personal data that we process for you if it is inaccurate, incomplete or out of date.

You also have the right at any time to require that we delete your personal data that we hold for you, but please note if you do this, we shall not longer be able to access or use the App.

At any time, you can withdraw your consent to receive our marketing emails; but please note that we will continue to contact you in relation to your Bumply account.

Please note, we reserve the right to charge an administrative fee if your request in relation to your rights is manifestly unfounded or excessive.

If you have any complaints in relation to this Privacy & Cookies Policy or otherwise in relation to our processing of your personal data, please tell us. We shall review and investigate your complaint and try to get back to you within a reasonable time. You can also contact the Information Commissioner, see www.ico.org.uk or if you are based outside of the United Kingdom, please contact your local regulatory authority

Retention of personal data

We retain your personal data in accordance with applicable laws. The length of time we keep your personal data depends on what it is and whether we have an on-going business need to retain it (for example, to provide you with access to the App or to comply with applicable legal, tax or accounting requirements).

We shall retain your personal data for as long as we have a relationship with you and for a period of time afterwards where we have an on-going business need to retain it, in accordance with our data retention policies and practices. Following that period, we shall make sure it is deleted or made it anonymous within our systems.

General

If any provision of this Privacy Policy is held by a court of competent jurisdiction to be invalid or unenforceable, then such provision shall be construed, as nearly as possible, to reflect the intentions of the parties and all other provisions shall remain in full force and effect.

This Privacy Policy shall be governed by and construed in accordance with English law and you

agree to submit to the exclusive jurisdiction of the English Courts.

Last updated: August 2018