

## Cureoscity Limited

### Privacy Policy (October 2020 Edition)

Cureoscity Limited ("We", "our" or "us") are committed to protecting and respecting your privacy. This policy (together with our Website Terms of Use, Cookie Policy and other documents referred to in this Privacy Policy) set out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

We are committed to safeguarding the privacy of the users of our services. This Privacy Policy sets out what personal data we collect, why we collect that personal data and how we handle it. We, Cureoscity Limited of 71-75 Shelton Street, Covent Garden, London, England, WC2H 9JQ are the Data Controller of the personal data referenced in this Privacy Policy, except where we expressly state otherwise.

Please read this Privacy Policy carefully. By visiting our website ([www.cureoscity.com](http://www.cureoscity.com)) you are accepting and consenting to the practices described in this Privacy Policy.

## 1. What information do we collect from you?

We may process the following data about you:

### 1.1 Information you give us.

What personal data might you supply to us?	How and why we process your personal data:
<b>Customer Account information:</b> Information about you which relates to your, or your employer's account with us. This information may include your name, your email address and your telephone and/or mobile number.	We will process this data to maintain your account with us, to provide our services to you, to communicate with you and to back up our database. The reason we process this data is to ensure the proper administration of your account and our business (our legitimate interest) and, where you have entered into a contract with us, for the purposes of fulfilling our contract with you. We may also use this information to tell you about changes to our services and to provide you with support.
<b>Registration Information:</b> If you download an application ("App") that we have developed, you will be required to provide certain information in order to (a) register to use that App and (b) to report any problems with the App to us. The information you give us may include your name, work e-mail and details of the company for whom you work]. In these circumstances we will be a data processor of such information. When you download an App we have developed, you will be required to accept the Mobile Application Terms of Use. The Mobile Application Terms of Use set out full details of how personal data provided by App users is collected, used and kept secure by us. The Mobile Application Terms of Use can be accessed from the App and will be made available to all App users before they register to use the App. .	We will process this data so we can deal with your registration or to address your query or concern. The reason we process this data is to ensure the proper administration of your registration and our business (our legitimate interest). We may also use this information to tell you about changes to our services and to provide you with support.
<b>Communication Data:</b> If you communicate with us, we may process the information contained in your communication. This information may include your name and contact information, the content of your	We will process that information so we can correspond with you and keep records of such correspondence. The reason we are processing this data is to ensure the proper administration of our

communication and any metadata our website generates where you communicate with us using the contact form available on our website.	business (our legitimate interest) and to comply with our legal duties. We may also use this information to tell you about changes to our services and to provide you with support.
<b>Notification Data:</b> Where you have subscribed to receive marketing information about our products and services, we will process your data so that we can send such marketing information to you. You can unsubscribe from receiving such communications at any time by contacting us via email at support@cureoscity.com.	The legal basis for us processing this data is that you have consented to such processing.
<b>Regulatory Data:</b> We may process your data if we need to do so in order to comply with our legal and/or regulatory obligations, so that we can protect the vital interests of you or another natural person.	The reason we will process such data is to protect the vital interests of you or another natural person and to comply with our legal duties.

## 1.2 Information we collect about you.

With regard to each of your visits to our website we will automatically collect the following information:

- (a) technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform. We will obtain this data through our analytics tracking system. We process this data so we can monitor and analyse how our website is used so we can improve our website and our services;
- (b) information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our website (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page. We process this data so we can monitor and analyse how our website is used so we can improve our website and our services.

## 1.3 Information we receive from other sources.

This is information we receive about you if you use any of the other websites we operate or the other services we provide. We work closely with third parties (including, for example, analytics providers, search information providers, credit reference agencies). We may receive personal data about you from these organisations. Those organisations will have their own privacy policies detailing how they process personal data.

## 2. Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Policy.

## 3. When will we disclose your personal data to others?

3.1 We may need to share your personal information with members of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries. These terms are defined in section 1159 of the UK Companies Act 2006. We will only share such personal information where this is necessary for the purposes set out in this policy.

3.2 We may need to share your personal information with certain selected third parties including:

- (a) our business partners, suppliers and sub-contractors for the purpose of performing any contract we have with you or them. In particular, we use third party companies to

process your personal data in order to process payments and with effect from January 2021, to store personal data in the cloud. These include Amazon Web Services, PayPal and Stripe;

- (b) analytics and search engine providers that assist us in the improvement and optimisation of our website;

3.3 We will also disclose your personal information to third parties in the following circumstances:

- (a) If we sell or buy any business or assets, in which case we may need to disclose certain personal data to the prospective seller or buyer of such business or assets.
- (b) If all or most of our assets are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets.
- (c) If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce any legal agreement we have with you; or to protect our rights or property, or the safety of us, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

## 4. Where do we store your personal data?

We will always try to ensure that your personal data is processed within the UK and European Economic Area. In some circumstances this will not be possible. In circumstances where it is necessary for us to transfer your personal data outside the European Economic Area, we will only transfer such personal data to third parties where we have carried out due diligence on such third parties to ensure they will protect your personal data using similar standards and safeguards as we have. We will also have contractual provisions in place with such third parties to ensure your personal data is protected. Such contractual provisions will be based on the standard contractual clauses approved by the European Commission for the transfer of data outside the EEA or such other appropriate standards as are required from time to time by the European Commission or the UK Government. You consent to the transfer of your personal data outside of the EEA, as long as we comply with these requirements.

Where you have chosen a password which enables you to access certain parts of our site, 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, and we will maintain appropriate technical and organisational measures to protect your personal data, we cannot guarantee the security of your data transmitted to our website; 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.

## 5. Storage and deletion of personal data

- a) We will only retain your personal information for as long as necessary to fulfil the purposes for which we collected it which will include satisfying any legal, accounting, or reporting requirements. Any personal data that we process will be deleted from our systems once we have completed the purpose for which we were processing the personal data. In some cases, the purpose for which we are processing your personal data will last for a considerable period (for example, if you are a long term customer of ours, we will need to store your data until our relationship with you comes to an end).
- b) To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. We will take into consideration a number of factors such as your relationship with us, your engagement with us, and the fulfilment of contracts we have with you.

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- c) We may need to retain your personal data where this is necessary to comply with our legal or regulatory obligations, or to protect the vital interest or the vital interests of another natural person.

## **6. Data security**

We have appropriate security measures in place to prevent personal information from being accidentally lost or from being 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.

## **7. Your rights**

7.1 Under data protection laws you have the following fundamental rights:

- (a) The right to access the personal data we hold about you;
- (b) The right to have your personal data corrected if there are errors or inaccuracies in it, or your personal data is incomplete;
- (c) The right to restrict the processing we carry out in relation to your personal data;
- (d) The right to object to the processing we carry out in relation to your personal data;
- (e) The right to have the personal data we hold about you provided to you in a useable format;
- (f) The right to complain to a supervisory authority (in the UK this is the Information Commissioner's Office) about how and/or why we are processing your personal data;
- (g) The right to tell us you no longer consent to us processing your personal data. In practice you will usually agree in advance to us using your personal data for marketing purposes and if you no longer wish us to use your personal data for marketing purposes, you can opt out of receiving such marketing messages at any time. You can do this either by unsubscribing from the marketing messages we send you or notifying us in writing at [support@cureoscity.com](mailto:support@cureoscity.com).

7.2 You can ask us to provide you with details of any personal data we hold about you. You do not have to pay us a fee to access your personal data unless we believe your access request is unfounded, repetitive or excessive. In this case we may charge you a reasonable fee to access your personal data or we may decide not to comply with your request. We will notify you if this is the case. We will require you to provide appropriate evidence of your identity before we respond to your request. Typically this identification evidence will be a photocopy of your passport or photo driving licence, which a solicitor or bank has certified as being a true copy of the original and a copy of a recent utility bill detailing your current address.

7.3 Our website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

7.4 If you think that any of the data we hold about you is incorrect or inaccurate, you can contact us to correct such data. Please contact us at [support@cureoscity.com](mailto:support@cureoscity.com) for these purposes.

## **8. Changes to our Privacy Policy**

Any changes we make to our Privacy Policy in the future will be posted on this page. Please check back frequently to see any updates or changes to our Privacy Policy.

## **9. Information about us**

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This Privacy Policy relates to Cureoscity Limited (company registration number 11235180). The registered office address is 71-75 Shelton Street, Covent Garden, London, England, WC2H 9JQ. We can be contacted by post at the above address, by phone +44 (0) 20 3920 6859 or by email [support@cureoscity.com](mailto:support@cureoscity.com).

Please address any queries relating to this Privacy Policy to the Data Protection Team.

## **10. Any questions?**

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to:

### **Cureoscity Limited**

Data Protection Team

71-75 Shelton Street, Covent Garden, London, England, WC2H 9JQ

Email: [support@cureoscity.com](mailto:support@cureoscity.com).

Phone: +44 (0) 20 3920 6859