

# Privacy Policy

Last Updated August 19th, 2019

## About this Document

Chirping Canary is pretty simple. Just a fun bubbly canary who wants to keep you safe from air pollution. However even Chirping Canary needs to cover his tail feathers by outlining how your information is used in this Privacy Policy.

Please read this Privacy Policy “the Policy”, carefully before using the Chirping Canary website and subscription notification service – which is collectively referred to as the “Service”.

This Policy sets out what information we collect and by what means; how we use the information; with whom we share information; how to access and update information; and how we store and protect information.

We store and process information about you when you use the Service. Some of that information may enable you to be identifiable, this is known as “Personal Information”. This document explains how we process that Personal information.

## Who we are

The Service is owned and operated by Chirping Canary Ltd – which is referred to by “us”, “we”, “Chirping Canary” or “our”. We are registered in England and Wales under registration number 12110253, and our registered office is at Vicarage Court, Vicarage Gate, London W84HG. Chirping Canary Ltd is registered with the Information Commissioner’s Office under registration reference ZA537969.

## General

By accessing or using the Service, you are accepting, in full, the Privacy Policy – If you do not agree with any part of the policy, then you may not use the service.

The Policy is subject to change by Chirping Canary at its sole discretion, without notice and at any time. Your continued use of the Service will constitute your acceptance of any revisions. We reserve the right to cease offering the Service at any time.

Our Policy applies to your use of the Service. We suggest you read it in conjunction with our “Cookies Policy” and our “Terms and Conditions”. When you subscribe to the Service or agree with our Policy then you consent to our collection, storage, use and disclosure of your personal data as we’ve set out in this Policy. We reserve the right to change our Policy at any time and without notice or as required by law. We recommend that you regularly review the Policy to understand how we use your personal data.

If you have any questions about this Policy, please contact us at [support@chirpingcanary.co.uk](mailto:support@chirpingcanary.co.uk).

### **Collection of information**

When you subscribe to the Service we may collect certain information about you such as:

- Mobile phone number
- First name
- Last name
- Email address
- Age

In order to use the Service, you must subscribe and agree to the following:

- Your mobile phone number must be yours and not that of another person or entity where it is not lawfully yours to use.
- If you provide a mobile phone number then you expressly consent to receiving SMS messages from Chirping Canary. Although there is no fee associated with this service, your mobile or telecommunications carrier may charge you for each message that you receive. You agree that we are not responsible for such charges. If you wish to stop receiving SMS messages – you may unsubscribe from the Service via the website or email us at [support@chirpingcanary.co.uk](mailto:support@chirpingcanary.co.uk).

Sharing this information is mandatory. If you do not share it, Chirping Canary will not be able to supply the Service.

### **Additional information we may collect**

Our mission at Chirping Canary is to help you reduce the adverse health effects caused by air pollution in London. To do this we store, use and share information about you when you use the Service. We may collect information about you such as the following:

- Keep and usage Cookies – please see Cookies policy
- If you contact us directly via email, we will receive your email address and may track your IP address to help resolve your query. We will keep all communication records from you.
- We may keep track of how you interact and use the Service.

### **Information usage**

To deliver the best experience to you we may use your mobile phone number and other information for the following:

- Offer you services and features
- Contact you with information about the Service and any new offerings
- Where applicable, personalise the services, functions and content we deliver to you
- Review how you interact and use the Service
- Where necessary to enforce our Terms and Conditions

### **Disclosure of Information**

We may access, share and retain information in response to local legal requirements and requests.

Chirping Canary may share information internally within our company and with other third parties. Information collected within the European Economic Area (EEA) may be transferred outside the EEA. Your data is stored via various services that can be located both inside and outside of Europe. If we transfer your information outside the EEA then we will take steps to make sure that your information is adequately protected and transferred in accordance with applicable EU data protection laws, usually by one or more of the following methods:

- ensuring the recipient is in a country which the European Commission has deemed provides adequate protection for personal data;

- implementing appropriate safeguards such as requiring the recipient to enter into Standard Contractual Clauses approved by the European Commission; or
- (if the recipient is based in the US) transferring personal data to recipients who are certified under the EU-US Privacy Shield scheme.

By submitting your personal data, you are agreeing to the terms and conditions of use and recognize and agree to the privacy policy. Any data you transmit is at your own risk. We have security features in place to facilitate data security.

### **Third Party Providers**

We work with third parties to provide various services to you including but not limited to the following:

1. Personal Information for measurement, supporting, servicing, and analytics
2. Personal Information to provide SMS notifications as part of the Service

Our service providers Google Analytics, Google Cloud, Twilio and Amazon Web Services may process your Personal Information in the course of providing the Service as well as providing analytical information to us about the use of the Service. These service providers may collect and/or transfer your Personal Information outside of the European Economic Area. By using this Site, you agree to this transfer, processing and/or storage outside of the European Economic Area.

Although they are used to provide the Service, Chirping Canary is not beholden to these providers and they may change over time. In which case the Policy will be updated.

- For more information on how Google Analytics processes your Personal Information you can visit: <https://support.google.com/analytics/answer/6004245?hl=en-GB>
- For more information on how Google Cloud processes your Personal Information you can visit: <https://cloud.google.com/security/gdpr/>
- For more information on how Amazon Web Services processes your Personal Information you can visit: <https://aws.amazon.com/compliance/gdpr-center/>
- For more information on how Twilio processes your Personal Information you can visit: <https://www.twilio.com/gdpr>

### **Updating your information**

You may access and modify certain types of information we hold about you including your mobile phone number. You can request to delete your information by getting in touch with us via [support@chirpingcanary.co.uk](mailto:support@chirpingcanary.co.uk). We may retain certain information about you to ensure that Users do not re-subscribe in breach of our Terms and Conditions.

## **Age**

You must be 18 years of age to Register and use the Service. By registering to the Service you warrant that you are the age that you represent. Chirping Canary does not knowingly collect any information anyone under the age of 18. Nor do we knowingly market to anyone under the age of 18. If you are less than 18 years old, we request that you do not submit information to us. If we become aware that a child or anyone under the age of 18 has registered with us and provided us with personal data, we will take steps to terminate that person's subscription and delete their information from the Service. If we do terminate your subscription because you violated our no children rules, we may retain your mobile phone number and IP address to ensure that you do not try to get around our rules by registering a new account.

## **Your rights**

In the EU you have individual rights that are protected under the General Data Protection Regulation (GDPR). For more information about these rights please click on the following

link: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>.

For individuals who reside outside of the EU, please refer to your local regulations.

## **Direct Marketing**

If you provide your contact details and opt-in to receiving marketing communication, we might contact you individually in the future if we think that our services or products may be of interest to you.

## **Links**

This Privacy Policy does not cover the links within the Service linking to other websites or applications. We encourage you to read the privacy statements on the other websites and applications you use.

### **Future Changes**

Chirping Canary reserves the right to replace, modify or revise the Policy. By continuing to use the Service after revisions become effective, you agree to the revised Policy. If you do not agree to the revisions, you must stop using the service. We will make available the latest Privacy Policy within the Service.

### **General Provisions**

These Terms are governed by, and is to be construed in accordance with, English law. The English Courts will have exclusive jurisdiction to deal with any dispute which has arisen or may arise out of, or in connection with these Terms.