

Welcome to nemo's privacy policy, where we will inform you about why we collect some of your information, how and where we use it, and decisions that users can make about what information they give to us. This policy is written with students in mind, and therefore avoids legal and technical terminology as much as possible.

This policy applies from launch, which is 10/01/22

1. Where to contact us

The company address responsible for all matters involving nemodating is:

John Loftus House
Summer road
Thames Ditton
Surrey KT7 0QQ
United Kingdom

2. Where this policy applies

This policy applies to the nemodating app, and is available within the app settings page. At this point in time, these are the only services we provide and to that extent, this policy only applies to those services. If at some point, we provide other services which require a different privacy policy, then the privacy policy attached to those services will apply there.

3. Information that we collect from you

In order for us to provide a service which improves the university experience, and generates meaningful interactions between users, it is of functional importance that some of your information is used by us in order to achieve this. This information generally comes in 3 forms: Firstly, information which you give to us about yourself (normally in the form of profile creation). Secondly, information which is generated from users whilst using our service (such as our catch-stack algorithm) and thirdly, information from third parties (such as connecting accounts from other social media platforms to our app). Below is a more-detailed explanation of the information that we collect from you:

You choose to submit some information to us when you create an account and for the purposes of clarity, user submitted information can be defined in 4 ways:

1. **Information necessary for account formation** - this includes essential information such as your name, your university email address, your age, your app preferences and at least one photo.
2. **Optional Information that you choose to submit to our service** - this may include a range of details such as but not exclusive to: Your area of study, your course and/or societies, your interests, where you are from, when you graduate and links to other social media applications. By using our app, you also consent to the processing of other information such as:

- When choosing photos to publish on the app, you may allow us to access your camera and/or photo album.
- When you participate in surveys designed to improve the functionality and user experience of the app, that data is logged for your benefit.
- If you choose to not participate/participate in our events features such as but not exclusive to 'Blind Date', that data may be stored for your improved user experience.
- If you contact our help and support team, details of these interactions will be collected in order to ensure that these services are scrutinised and therefore improved for a better user experience.
- In order to allow for a beneficial user experience, chats are collected so that users can retrieve previous messages that they have exchanged with other users.

3. Information we receive from other parties - other than the information that we receive from users directly, we also collect information about you from others, such as:

- We collect information that other users may provide about you, such as through our reporting system, in the event that you may have breached our terms and conditions.
- We receive information from third party social media companies (Instagram) so that users can customise their profiles and share their experiences from other platforms with us.
- We may also receive information about you from third party social media companies (such as Instagram, Twitter and Facebook) that we use to advertise our services on.

4. Information that we collect as you use our service - when you use our services, we collect the relevant information necessary to ensure that the app functions as desired. A list of this information can be found below:

- We collect *Usage information* - this is determined by how you use the app for example, date and time you logged in, which features you have used and how you have used them, clicks and pages which have been shown to you, advertising that you click on, users you message or interact with, and the date and time of those exchanges, and the number of such interactions.
- we collect *device information* - consult Archie + Kaan

4. Cookies and other similar data technologies

yes, but the extent to which this is done is tbd.

5. How we use information

It goes without saying that we use your information in order to improve the user experience of our app. We also use your information to protect you and keep you safe, and to comply with the relevant legal authorities when deemed necessary. Below is a more in-depth breakdown of how we use your information:

For account creation and to provide our service - We use your information to create and manage your account, provide customer support and respond to your queries.

To help you connect with other users - We use automated decision making processes that help users find other users that we believe are more likely to engage with one another. We also use your data to allow users

to customise their 'catch-stack' by editing their search criteria for other prospective 'catches'.

To ensure a consistent experience across devices - We log your data so that you can access your account from multiple devices seamlessly, without having to have your user experience compromised.

To serve you relevant offers and ads - In order to effectively administer the right offers for features such as but not exclusive to 'Blind Date', and potentially in the future to offer promotions or advertisements for other services that we may provide.

To improve our services and help develop new ones - We may use your data during surveys, or other forms of feedback that you choose to submit. We may also conduct research and analysis of user-behaviour in order to help improve our services (for example, we may change the user interface if it is clear that users would prefer that). We may also develop new features of the app dependant on the results of our research and analysis.

To prevent and detect illegal activity such as but not exclusive to fraud - We use your data in order to address past or present misbehaviour on and off (where required and seen as important) our platform. We may in the future perform data analysis in order to help understand and design counter measures that help reduce the likelihood of these activities taking place.

To ensure legal compliance - we use your data to comply with the relevant legal authorities, assist law enforcement and enforce both your rights and ours, which are made clear in the terms and conditions of our services. To process your information as detailed above, we rely on the following legal bases:

1. *Provide our service to you* - For the most part, we use your data in order to fulfil our agreement with you the user. For example, as you use our app, and try to connect with other university students, we store valuable information that you submit on the app so that you can continue to use the app, and so that other users can view your profile.
2. *Legitimate interests* - We use use your information where it is of clear and of obvious legitimate interest. For example, we analyse user data in order to improve our service for the user. We may also use your data where legally or administratively necessary.
3. *Consent* - In the future, we may ask for you to give consent for certain specific reasons. You may withdraw your consent at any time by contacting us at the address given prior in this document.

6. How we share information

It goes without saying, that the main recipient of your data are other university students using the app. This is of course with the aim, of providing a great user experience for everyone involved. However, we also share some information with third parties - such as our service providers and any partners in the future who may assist us in the operation of our services. We may also share information with legal authorities where deemed necessary. For a more detailed break down on this please read below:

- *Other users* - We share your information with other users as per your settings when you voluntarily disclose information on the service. Please be aware that neither you nor we can control what users do with your information once it is made public. Therefore, we ask that you carefully consider the information that you choose to submit on your profile prior to doing so. If you choose to limit the audience that

can view your profile, this will be visible in both your settings and/or 'search criteria'.

- *With our service providers and potential partners* - We use third party assistance to help operate our services. These third parties assist us with various tasks such as data hosting and maintenance, analytics, security and in the future may assist with payment processing. We may in the future also share information with partners who may assist us in providing an advertising service. If this is the case, we will follow a strict vetting process when engaging with any potential partner, and those involved will sign legally obliging confidentiality agreements.
- *For corporate transactions* - We may transfer your data if we are involved in a merger, sale, acquisition, divestiture, restructuring, reorganisation, dissolution, bankruptcy or other change of ownership or control.
- *When required legally* - We may share your data with legal authorities where deemed sensible and necessary. This may occur when: we have to comply with a legal process such as a court order, subpoena, search warrant, government or law enforcement investigation or other legal requirements not specific to those listed above. We may also share your data in order to assist in the prevention/detection of a crime where it is subject to applicable law. Or in cases where it is possible, the safety of an individual.
- *To enforce legal rights* - We may also share information: (i) if disclosure would mitigate our liability in an actual or threatened lawsuit; (ii) as necessary to protect our legal rights and legal rights of our users, business partners or other interested parties; (iii) to enforce our agreements with you; and (iv) to investigate, prevent, or take other action regarding illegal activity, suspected fraud or other wrongdoing.
- *With your consent* - We may in the future, ask for your consent to share specific data with third parties.

We may also share non-identifiable data (which does not in itself, identify you personally with that data) with third parties, in order to for example, deliver a better range of products, improve user experience, or deliver targeted advertising to prospective and current users.

7. Your rights

- *Access/update personal information* - Users can access their account information in their profile/settings pages, and change it accordingly. The only information that cannot be changed is the name and age of a specific user. If there are any problems associated with this please feel free to email us at enquiries@nemodating.com.
- *Device permissions* - Mobile platforms (such as Android and IOS) have specific device data and notification customisation processes. You can change these within the settings pages of your mobile platforms. By doing this however, users will not necessarily have full app functionality.
- *Deletion* - Users may delete their account using the corresponding functionality directly within the service.

We want you to have a clear understanding of your privacy rights, here are some points to keep in mind:

- *Reviewing your information* - Applicable privacy laws in some jurisdictions may give you the right to request the information we

store about you. You can request this information by contacting us via email at enquiries@nemodating.com .

- *Updating your information* - If you feel that the information we have stored about you is incorrect or feel that we are no longer entitled to it use it and want to request rectification, please email us at enquiries@nemodating.com .

In order to protect all of our users, we may ask you for proof of identification before we can find resolutions to the above requests. If the request you have made is unlawful, or infringes upon the privacy of other users without their consent, then we may reject such claims. If you want to access information about another user, then we will need consent from that user before processing your request. That user can contact us and give consent by email at enquiries@nemodating.com . It must also be said that proof of identification for said user will be necessary in order to consent to such information release.

We are also not able to process some requests, as some information is necessary for account formation. For example, we cannot allow users to remove their age, as this is a pre-requisite for having an account.

- *Uninstall* - to prevent further information collection, you can uninstall the app on your mobile device. If done, the unique identifier associated with your device will still be stored. Therefore, if you re-install the app on your device, we will be able to retrieve your previous information relating to previous activities and transactions on the app.
- *Accountability* - In certain countries, you have the right to lodge a complaint with the corresponding data protection authority if are concerned about the way in which we have stored your data.

8. How we protect your information

At nemo, we take your security very seriously. We try our best to protect you from unauthorised alteration, deletion or publication of your personal information. However, as a company in technology, it is impossible to guarantee that your personal information will always remain guaranteed.

We try our best to monitor systems on a constant basis, and all of our processes are constantly under internal review, in order to ensure the best level of security for our users.

We may suspend your use of the app indefinitely if we feel as though the security of your information is under threat. If you feel as though your information is not being secured, please contact us at enquiries@nemodating.com .

9. How long we retain your information

We keep your personal information in so far as it is necessary for legitimate business purposes (as can be seen in section 5 of this document) and as permitted by the relevant legal authorities.

We will delete or anonymise your account information, unless:

1. We must retain it in order to comply with the relevant legal authorities.
2. We need to keep it in order to use it as evidence for our compliance with the relevant legal authorities.
3. There is an issue which is currently unresolved, and the information is necessary until such issue is resolved.

4. The information is necessary for the maintenance of our legitimate business interests, such as fraud prevention and ensuring user safety. For example, we may keep information relating to a user who has been banned for breaching our terms and conditions, so that this user is unable to create a new profile again.

We cannot guarantee that all data will be deleted or anonymised in respect to the above guidelines, within a specific timeframe, due to technical constraints.

10. Age policy

Our services are only available to those older or equal to **17 years of age**. We do not allow users of any age lower than this to use our service. We do not knowingly collect information about anyone lower than 17 years of age. If you suspect that someone using the app is under the age of 17, please use the in app reporting mechanism to help us investigate further.

11. Privacy policy updates

In order to deliver the best user experience, we may find new ways to help you engage with other university students. This may require an update to our privacy policy. We will inform all users about said changes, before any are actually made.

12. How to contact us

If you have any queries relating to this document, you can contact us by using the following methods:

By email : enquiries@nemodating.com

By post: John Loftus House
Summer road
Thames Ditton
Surrey KT7 0QQ
United Kingdom