

PRIVACY POLICY

Policy version: 20 October 2022

PARENTS WILL SIGNUP AND ADD THEIR CHILDREN'S ACCOUNT AS THEIR CARER OUR SERVICES ARE AVAILABLE EXCLUSIVELY IN THE UK

1 INTRODUCTION

This Privacy Policy is provided by Junior Deals Ltd, a company registered in England and Wales under company number: 13734527 with registered office 115 London Road, Morden, England, SM4 5HP ('we', 'our' or 'us') for use of our products and services including our Junior Deals app, website at www.juniordeals.co.uk and marketplace services (**Services**).

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on how and why we collect, store, use and share any information relating to you (your **personal data**). Personal data is information that can be used to identify you.

It also explains your rights regarding your personal data and how to contact us or the regulator if you have a complaint. Our collection, storage, use and sharing of your personal data is regulated by law, including under the UK General Data Protection Regulation (**UK GDPR**).

We are the controller of personal data obtained via the Services, meaning we are the organization legally responsible for deciding how and for what purposes it is used.

2 CONSENT

Parents will sign up for the Junior Deals platform, and then they can add their children's accounts to synchronize their accounts.

WHAT THIS POLICY APPLIES TO

This privacy policy relates to your use of the Services only.

3 PERSONAL DATA WE COLLECT ABOUT YOU

The personal data we collect is collected when you access the Services, that data depends on the particular activities carried out through the Services. We will collect and use the following personal data:

Category of data	In more detail
Identify and account data you input into the Services You must register to use the Services so that we can check if you need your parent or carer to help you	<ul style="list-style-type: none">• Parent or carer's name, mobile number and email address• Your account details, such as username and password• Your age, name (and email address where a parent or carer is not required for use of the Services)
Data collected when you use specific functions in the Services	Data you store online with us using the Services including your usage history or preferences (while such data may not always be personal data as defined at law in all cases we will assume it is and treat it in accordance with this policy as if it were)
Other data the Services collects automatically when you use it	<ul style="list-style-type: none">• Your activities on, and use of, the Services which reveal your preferences, interests or manner of use of the Services and the times of use includes information about your visit to our website, including the full Uniform Resource Locators (URL), clickstream to, through and from our website (including date and time), products you viewed or searched for, and page response times.

If you do not provide personal data we ask for where it is required, we might not be able to provide services and/or the Services to you. But, **ONLY** give us information we ask for, nothing more. See 'How and why we use your personal data' below.

4 HOW AND WHY WE USE YOUR PERSONAL DATA

Under data protection law, we can only use your personal data if we have a proper reason, the table below explains what we use your personal data for and why.

What we use your personal data for	Our reasons
Providing services and/or the Services to you	<p>Where we need to perform the contract we are about to enter into or have entered into with you;</p> <p>Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; and/or</p> <p>Where we need to comply with a legal or regulatory obligation.</p>
To enforce legal rights or defend or undertake legal proceedings	<ul style="list-style-type: none"> to comply with law to protect our business, interests and rights or those of others
Communications with you not related to marketing	<ul style="list-style-type: none"> to comply with law to provide the best service to you
Protect the security of systems and data	To protect systems and data and to prevent and detect criminal activity that could be damaging for you and/or us
Improving efficiency, training, and quality control or to provide support to you	To be as efficient as we can so we can deliver the best service to you
Statistical analysis to help us manage our business, e.g., in relation to our performance, customer base, app and functionalities and offerings or other efficiency measures	To be as efficient as we can so we can deliver the best service to you and improve and develop our app
Updating and enhancing user records	<ul style="list-style-type: none"> to perform in terms of the Terms and Conditions of Use which apply to the Services to comply with our legal and regulatory obligations

5 MARKETING

We intend to email marketing to inform you of our Services.

We will always ask you for your consent before sending you marketing communications, except where you have explicitly opted-in to receive email marketing from us in the past.

Where you have given us your consent or if you have previously purchased from us, we may use your information to contact you about products that you have purchased, to tell you about goods and services which we consider may interest you, our offers available from time to time, or to send you a copy of our annual catalog. Our marketing communications may be provided to you by email, post, or such other means as we choose.

If you have opted-in, you have the right to opt-out of receiving marketing communications at any time by:

- contacting us at support@juniordeals.co.uk
- using the 'unsubscribe' link included in all marketing emails you may receive from us

We will always treat your personal data with the utmost respect and never sell or share it with other organizations for marketing purposes.

For more information on your right to object at any time to your personal data being used for marketing purposes, see '**Your rights**' below.

6 WHO WE SHARE YOUR PERSONAL DATA WITH

We routinely share personal data with service providers we use to help us run our business or provide the services or functionalities in the Services, including developers and cloud storage providers.

We only allow service providers to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. We also impose contractual obligations on service providers to ensure they can only use your personal data to provide services to us and to you.

We or the third parties mentioned above may occasionally also need to share your personal data with:

- external auditors, e.g. in relation to the audit of our accounts and our company—the recipient of the information will be bound by confidentiality obligations
- professional advisors (such as lawyers and other advisors)—the recipient of the information will be bound by confidentiality obligations
- law enforcement agencies, courts or tribunals and regulatory bodies to comply with legal and regulatory obligations

If you would like more information about who we share our data with and why, please contact us (see '**How to contact us**' below).

We will not share your personal data with any other third party.

7 HOW LONG YOUR PERSONAL DATA WILL BE KEPT

We will keep your personal data for as long as you have an active account with us and for a period of up to 6 years thereafter to comply with any accounting or legal obligations. Once you have closed your account with us, we will move your personal data to a separate database so that only key stakeholders in our business on a 'need-to-know basis' have access to such data.

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. This means that the period of time for which we store your personal data may depend on the type of data we hold.

Following the end of the of the above period, we will delete or anonymise your personal data.

8 TRANSFERRING YOUR PERSONAL DATA OUT OF THE UK

Our Services are restricted to the UK and therefore we do not transfer your personal data outside of the UK. If this changes, we would comply with applicable UK laws designed to ensure the continued protection and privacy of your personal data.

9 YOUR RIGHTS

You generally have the following rights, which you can usually exercise free of charge. For more information regarding these rights, please visit the ICO website [here](#).

Access to a copy of your personal data	The right to be provided with a copy of your personal data.
Correction	The right to require us to correct any mistakes in your personal data.
The right to be forgotten	The right to require us to delete your personal data—in certain situations.

Restriction of use	The right to require us to restrict use of your personal data in certain circumstances, e.g. if you contest the accuracy of the data.
Data portability	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations.
To object to use	<p>The right to object:</p> <ul style="list-style-type: none"> • at any time to your personal data being used for direct marketing (including profiling) • in certain other situations to our continued use of your personal data, e.g. where we use your personal data for our legitimate interests.
Not to be subject to decisions without human involvement	<p>The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you</p> <p>We do not make any such decisions based on data collected by the Services.</p>

If you would like to exercise any of those rights, please email, call or write to us—see below: **‘How to contact us’**. When contacting us please:

- provide enough information to identify yourself (e.g., your full name and username) and any additional identity information we may reasonably request from you, and
- let us know which right(s) you want to exercise and the information to which your request relates
- Remember, if you are under 13, you will need the assistance of one of your parents or carers.

10 **KEEPING YOUR PERSONAL DATA SECURE**

We have appropriate security measures to prevent personal data from being accidentally lost or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it.

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.

11 **HOW TO COMPLAIN**

Please contact us if you have any queries or concerns about our use of your information (see below **‘How to contact us’**). We hope we will be able to resolve any issues you may have.

You also have the right to lodge a complaint with the Information Commissioner.

The Information Commissioner can be contacted at <https://ico.org.uk/make-a-complaint> or telephone: 0303 123 1113.

12 **CHANGES TO THIS PRIVACY POLICY**

We may change this privacy policy from time to time. When we make significant changes we will take steps to inform you, for example via the Services or by other means, such as email.

13 **HOW TO CONTACT US**

You can contact us by post, email or telephone if you have any questions about this privacy policy or the information we hold about you, to exercise a right under data protection law or to make a complaint.

Our contact details are shown below:

- 115 London Road, Morden, England, SM4 5HP
- support@juniordeals.co.uk
- [+44 7448 454910]