

# PRIVACY POLICY

Mooveet Tec Limited (referred to as “**Mooveet**”, “**Picado**”, “**we**”, “**us**” or “**our**” in this policy) is committed to protecting your personal data and respecting your privacy.

## INTRODUCTION

This policy (together with our end-user license agreement as set out at [\[to be linked to legal terms\]](#) (the “**EULA**”) and any additional terms of use incorporated by reference into the EULA, together our “**Terms of Use**”) applies to your use of:

- Picado, [latest release date TBC], mobile application software (the “**App**”) [available on our site] (the “**App Site**”), once you have downloaded or streamed a copy of the App onto your mobile telephone or handheld device (the “**Device**”).
- Any of the services accessible through the App (the “**Services**”) that are available on the App Site or other sites of ours (the “**Services Sites**”). This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. This App is not intended for children and we do not knowingly collect data relating to children. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

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## IMPORTANT INFORMATION AND WHO WE ARE

Mooveet is the controller and is responsible for your personal data.

If you have any questions about this privacy policy, please contact them using the details set out below.

## Contact details

Our full details are:

- Name and form of legal entity: Mooveet Tec Limited, a private company limited by shares.
- Email address: mooveetec@gmail.com
- Postal address: Athalassas, 143, Flat/Office101, Strovolos 2015, Nicosia, Cyprus
- [Telephone number: [+35799924269]

You have the right to make a complaint at any time to the Office of the Commissioner for the Protection of Personal Data (the “**Commissioner**”), the Cypriot supervisory authority for data protection issues.

### **Changes to the privacy policy and your duty to inform us of changes**

We keep our privacy policy under regular review.

This version was last updated on [25/05/2020]. It may change and if it does, these changes will be posted on this page and, where appropriate, notified to you [by SMS and/or by email and/or when you next start the App or log onto one of the Services Sites]. The new policy may be displayed on-screen and you may be required to read and accept the changes to continue your use of the App or the Services.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during our relationship with you.

### **Third party links**

Our Sites (as this term is defined below) may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. Please note that these websites and any services that may be accessible through them have their own privacy policies and that we do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites or services, such as Contact and Location Data. Please check these policies before you submit any personal data to these websites or use these services.

### **THE DATA WE COLLECT ABOUT YOU**

We may collect, use, store and transfer different kinds of personal data about you as follows:

- Identity Data.
- Contact Data.
- Financial Data.
- Transaction Data.
- Device Data.
- Content Data.
- Profile Data.
- Usage Data.
- Marketing and Communications Data.
- Location Data.

We explain these categories of data below in the heading ‘DESCRIPTION OF CATEGORIES OF PERSONAL DATA’.

[We also collect, use and share aggregated data such as statistical or demographic data (“**Aggregated Data**”) for any

purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific App feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.]

We do not collect any information about criminal convictions and offences.

We do not proactively collect special category personal data, such as data related to your health. However, our Services include text and/or comment boxes that are designed for you to describe details about your dietary requirements and/or preferences. Please be aware that information that you freely submit in these text and/or comment boxes may reveal to us or to the Venue Providers and their affiliates certain information that may be considered as special category personal data, e.g. information about allergies or dietary restrictions. We do not use this information for the purpose of marketing or advertising products to you. Any special category personal data that you may voluntarily submit is processed on the basis of your consent, which you may revoke at any time by contacting us at the details set out above [please see the 'Contact Details' under the heading 'IMPORTANT INFORMATION AND WHO WE ARE'].

## HOW IS YOUR PERSONAL DATA COLLECTED?

We will collect and process the following data about you:

- **Information you give us.** This is information (including Identity, Contact, Financial, and Marketing and Communications Data) you consent to giving us about you by filling in forms on the App Site and the Services Sites (together “**Our Sites**”), or by corresponding with us (for example, by email or chat). It includes information you provide when you register to use the App Site, download or register an App, subscribe to any of our Services, search for an App or Service, make orders, share data via an App’s social media functions, enter a competition, prize draw, promotion or survey, and when you report a problem with an App, our Services, or any of Our Sites. If you contact us, we will keep a record of that correspondence for a time period of three (3) years.
- **Information we collect about you and your device.** Each time you visit one of Our Sites or use one of our Apps we will automatically collect personal data including your IP, Content and Usage Data. We collect this data using cookies and other similar technologies. Please see our cookie policy found here [\[to be linked to Legal Terms\]](#) for further details.
- **Location Data.** We also use your device’s location services to determine your current location. Some of our location-enabled Services require your personal data for the feature to work. If you wish to use the particular feature, you will be asked to consent to your data being used for this purpose. You can withdraw your consent at any time by disabling Location Data in your device’s settings revoking access to your location details for the application.
- **Information we receive from other sources including third parties and publicly available sources.** We will receive personal data about you from various third parties [and public sources] as set out below:
  - Device Data from the following parties:
  - analytics providers [such as Facebook and Google based outside the EU];
  - advertising networks [such as Google or Facebook based inside and/or outside the EU]; and
  - search information providers [inside and/or outside the EU].
  - Contact, Financial and Transaction Data from providers of technical, payment and delivery services [such as Wordline - SIX Payment Services (Europe) S.A. based inside and/or outside the EU];
  - Identity and Contact Data from publicly available sources; and
  - IP and usage information via crash reporting platform Firebase Crashlytics (owned by Google)

- **Unique application numbers.** When you want to install or uninstall a Service containing a unique application number or when such a Service searches for automatic updates, that number and information about your installation, for example, the type of operating system, may be sent to us.]

## COOKIES

We use cookies [and/or other tracking technologies] to distinguish you from other users of the App, App Site, the distribution platform (Appstore) or Services Sites and to remember your preferences. This helps us to provide you with a good experience when you use the App or browse any of Our Sites and also allows us to improve the App and Our Sites. For detailed information on the cookies we use, the purposes for which we use them and how you can exercise your choices regarding our use of your cookies, see our cookie policy here [\[To be linked to Legal Terms\]](#).

## HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to do so. Most commonly we will use your personal data in the following circumstances:

- Where you have consented before the processing.
- Where we need to perform a contract we are about to enter or have entered with you.
- 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.
- Where we need to comply with a legal or regulatory obligation.

To find out more about the types of lawful basis that we will rely on to process your personal data please read below under the heading 'GLOSSARY' and 'LAWFUL BASIS'

We will only send you direct marketing communications by email or text if we have your consent. You have the right to withdraw that consent at any time by contacting us.

[We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.]

## PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

Purpose/activity	Type of data	Lawful basis for processing
To install the App and register you as a new App user	Identity Contact Financial Device	Your consent
To process any orders made and deliver Services including managing payments and collecting money owed to us	Identity Contact Financial Transaction	Your consent  Performance of a contract with you  Necessary for our legitimate interests (to recover debts due to us)

	Device Marketing and Communications Location	
To manage our relationship with you including notifying you of changes to the App or any Services	Identity Contact Financial Profile Marketing and Communications	Your consent Performance of a contract with you Necessary for our legitimate interests (to keep records updated and to analyse how customers use our products/ Services) Necessary to comply with legal obligations (to inform you of any changes to our terms and conditions)
[To enable you to participate in a prize draw, promotion, competition or complete a survey]	Identity Contact Device Profile Marketing and Communications	Your consent Performance of a contract with you Necessary for our legitimate interests (to analyse how customers use our products/Services and to develop them and grow our business)]
To administer and protect our business and this App including troubleshooting, data analysis and system testing	Identity Contact Device Profile	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security)

## HOW WE SHARE YOUR INFORMATION

We share the personal data we collect (or otherwise generate or obtain) as follows:

- With Third Parties as set out in the heading 'GLOSSARY'.
- With restaurants and/or venue providers and their affiliates. We disclose your personal data to restaurants and/or venue providers and their affiliates to provide the Services (such as connecting you with the venue providers in order to place an order and sharing your order, including any preferences, requests, or restrictions with the venue provider).
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our

business, then the new owners may use your personal data in the same way as set out in this privacy policy.

- **Reviews you submit:** if you provide us with a review of your order, you authorize us to publish it on all our Services under the screen name you provided, to aggregate your review with other reviews, and to share it with venue providers.
- **Messages and other communications you submit to venue providers:** if you submit a message or other communication to a venue provider through our Services, you authorize us to share this with the relevant venue provider and you authorize the venue provider to respond to you through our Services.
- **To process payments:** We require credit or debit card information to place your order, in which case we share your payment information with venue providers, third-party payment processors and other third-party service providers (such as fraud detection services).
- **Following login services:** We share your details with social networking sites and third-party services or applications such as Gmail or Facebook that you may use to log into your account.

## **INTERNATIONAL TRANSFERS**

We do not transfer your personal data outside the European Economic Area (EEA).

## **DATA SECURITY**

Once we have received your information, we will use strict procedures and security features to try to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way. This is achieved by using up-to-date and standard technological security tools and measures.

We will collect and store personal data on your Device using application data caches and browser web storage (including HTML5) and/or any alternate mechanisms and technology.

Certain Services may include social networking, chat room or forum features. Ensure when using these features that you do not submit any personal data that you do not want to be seen, collected or used by other users.

All information you provide to us is stored on our secure servers. Any payment transactions carried out by our chosen third-party provider of payment processing services will be encrypted using Secured Sockets Layer technology and/or any alternate encryption technology. Picado does not itself store your credit or debit card account information, and we do not have direct control over or responsibility for your credit or debit card account information. We use third party payment processors that are the controllers of your card information. Our contracts with third parties that receive your card account information require them to keep it secure and confidential.

However, we cannot guarantee that transmissions of your card account information or any other information will always be secure or that unauthorised third parties will never be able to defeat the security measures taken by Picado or our third-party services providers. Except to the extent that liability cannot be excluded or limited due to applicable law, Picado assumes no liability or responsibility for disclosure of your information due to errors in transmission, unauthorised third-party access, or other causes beyond our control.

You play an important role in keeping your information safe. Where we have given you (or where you have chosen) a password that enables you to access certain parts of Our Sites, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. If we receive instructions using your username and password, we will assume you have authorized the instructions. If you have reason to believe that your interaction with us is no longer secure, please contact us immediately using the contact details provided above, under the heading 'IMPORTANT INFORMATION AND WHO WE ARE'. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator when we are legally required to do so.

## **DATA RETENTION**

We may retain your personal data for as long as your account is active and for a period of time thereafter to allow

you to re-activate your account without loss of information. In the event that you do not use the App for a period of [18 months] then we will treat the account as expired and your personal data may be deleted.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for seven years after they cease being customers for tax and audit purposes.

We may also retain your personal data as necessary to:

- maintain logs and business records for analysis and security purposes;
- comply with other record retention requirements under the law;
- handle any complaints regarding the Services; and
- comply with our legal obligations, protect or defend our rights, resolve disputes and enforce our contracts.

In some circumstances you can ask us to delete your data: see under heading named 'YOUR LEGAL RIGHTS' below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## YOUR LEGAL RIGHTS

Under certain circumstances you have the following rights under data protection laws in relation to your personal data.

Please see under the heading named 'YOUR LEGAL RIGHTS' below to find out more about these rights:

- *[Request access to your personal data.]*
- *[Request correction of your personal data.]*
- *[Request erasure of your personal data.]*
- *[Object to processing of your personal data.]*
- *[Request restriction of processing your personal data.]*
- *[Request transfer of your personal data.]*
- *[Right to withdraw consent.]*

You also have the right to ask us not to continue to process your personal data for marketing purposes.

You can exercise any of these rights at any time by contacting us at [Athalassas, 143, Flat/Office101, Strovolos 2015, Nicosia, Cyprus] and/or at [mooveetec@gmail.com](mailto:mooveetec@gmail.com).

## GLOSSARY

### LAWFUL BASIS

- **Consent** means processing your personal data where you have signified your agreement by a statement or clear opt-in to processing for a specific purpose. Consent will only be valid if it is a freely given, specific, informed and unambiguous indication of what you want. You can withdraw your consent at any time by contacting us.
- **Legitimate interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your

personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

- **Performance of contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- **Comply with a legal obligation** means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

### THIRD PARTIES

- Service providers acting as processors, based in and/or outside the EU, who provide IT and system administration services, including payment service providers.
- Professional advisors acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in Cyprus who provide consultancy, banking, legal, insurance and accounting services.
- Regulators and other authorities acting as processors or joint controllers based in Cyprus who require reporting of processing activities in certain circumstances.
- Other third parties in order to (i) comply with and as required by law (e.g. to comply with legal requirements, court orders or lawful requests from governmental authorities), (ii) protect our rights, our property, the integrity of the Services, personal safety, the legitimate interests of Picado or any other person such as to detect, prevent and/or otherwise address fraud, risk management, security or technical issues, and (iii) comply with a request or direction from you or subject to your consent.

### YOUR LEGAL RIGHTS

You have the right to:

- **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
  - (a) if you want us to establish the data’s accuracy;



(b) where our use of the data is unlawful but you do not want us to erase it;

(c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or

(d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
- **Lodge a complaint with the Commissioner** if you think that any of your rights have been infringed by us.

## DESCRIPTION OF CATEGORIES OF PERSONAL DATA

- **Identity Data:** first name, last name, maiden name, username or similar identifier, marital status, title, date of birth, gender.
- **Contact Data:** billing address, address, email address and telephone numbers.
- **Financial Data:** bank account and payment card details.
- **Transaction Data:** includes details about payments to and from you and details of orders made by you.
- **Device Data:** includes the type of mobile device you use, a unique device identifier, mobile network information, your IP address, your mobile operating system, the type of mobile browser you use, and time zone setting you use.
- **Content Data:** includes information stored on your Device, including friends' lists, login information, photos, videos or other digital content, and check-ins.
- **Profile Data:** includes your username and password, your orders, your interests, preferences, feedback and survey responses.
- **Usage Data:** includes details of your use of any of our Apps or your visits to any of Our Sites including, but not limited to, traffic data and other communication data, whether this is required for our own billing purposes or otherwise [and the resources that you access].
- **Marketing and Communications Data:** includes your preferences in receiving marketing from us and/or from our third parties and your communication preferences.
- **Location Data:** includes your current location accessed through location-enabled Services