

# eharmony United-Kingdom

## Privacy policy

**Version: 04.06.2020**

Thank you for using eharmony!

Please note that we offer our Service (as defined below) in different countries and as such, you understand that the information included in your profile will be visible to our members in all of these countries. You can see the list of these countries on our website. You will also be able to search for a partner in any of these countries, not just your own country.

This privacy policy explains what personal data eharmony collects, how we use this data and what rights you have as an eharmony user in relation to your personal data. The controller of your personal data is eHarmony UK Ltd., 6-10 Great Portland Street, London W1W 8QL, Great Britain (hereafter "eharmony", "us", "our", "we").

[Here](#) you can find information about data processing in connection with Cookies and other tracking technologies when using the eharmony website. [Here](#) you can find information about data processing in connection with tracking technologies when using the eharmony app.

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## Contact / Data Controller

Unless otherwise stated in this privacy policy, the controller of your personal data is eHarmony UK Ltd.

If you have any questions or suggestions about how we use your personal data, please contact us or our data protection officer.

Our contact details are as follows:

eHarmony UK Ltd., Customer Care, BM Box 5904, London WC1N 3XX, United-Kingdom, [privacypolicy@eharmony.co.uk](mailto:privacypolicy@eharmony.co.uk) (email)

### **You can reach our data protection officer at:**

Dr. Stefanie Wegener, [privacypolicy@eharmony.co.uk](mailto:privacypolicy@eharmony.co.uk) (email)

## Collection, processing and use of personal data

Personal data is any information relating to an identified or identifiable natural person (e.g., name, address, phone number, date of birth or e-mail address). When we say that we process personal data, this means that we collect, store, use, transfer to others or delete such data.

eharmony collects and processes your personal data exclusively in the following cases:

- If you visit us on our website without being a member.
- If you contact us directly.
- If you install our eharmony app.
- If you subscribe an eharmony membership (paid or free) and then use eharmony.

Once you have signed up for an eharmony account, we will provide you with access to an online database over which you will be able to get know other eharmony-registered customers (also known as members). In order to provide you with the eharmony service as described in the General Terms and Conditions (the "eharmony Service" or "Service"), we need to use your personal data. If you do not want us to use your personal data, we will not be able to provide you with the Service. You will also need to provide us with special categories of personal data (i.e. sensitive personal data, such as information about your sexual orientation). Please see below for further information about the types of personal data eharmony collects when you use our Service.

### Data Processing through app-stores

Before you can install this app, you may have to enter into a user agreement with an app-store operator (e.g. Google or Apple) to access the relevant app-store. Our app is available on different app platforms (app-stores), depending on your particular operating system.

In order to install and use our app via these app-stores, you will need to have a valid account with the relevant app-store (e.g. iTunes account) as well as a compatible device (e.g. a

smartphone). eharmony has no control over the collection, processing and use of personal data in this respect. The operator of the relevant app-store will be the sole data controller of this information. If necessary, please contact the operator of the respective app-store directly for information about their processing of data. eharmony is the data controller with respect to your personal data only when you use the eharmony app.

### What personal data does eharmony collect from its members to fulfil the contractual relationship?

In order to register for the eharmony Service and to conclude further a Basic Membership or a Premium Membership, you will need to provide us with the personal data described below. In addition, in order to provide you with our Services (as more fully described in the [General Terms and Conditions](#)), we need to process this personal data.

### Registration process

In order to register for the eharmony free Service (conclusion of a "Basic Membership"), you will need to provide us with personal data, without which the registration cannot be completed. These data are:

- » Gender and sex of partner sought (your sexual preference is a data regarding your sexual orientation and therefore a sensitive personal data)
- » Email address
- » Password

If you have chosen to log in via a third-party provider such as Facebook or Apple, you do not need to enter an email address or a password during the registration process. You can access eharmony's Service respectively with the email address and the password you have indicated (your access data) or alternatively, via the third party provider's login data.

### During registration via Apple ("Sign in with Apple")

You can register to join the eharmony Service using your Apple-ID. If you choose to do this, we will receive the information that we need for your registration directly from Apple. Apple will also provide us with your email address that is associated with your Apple-ID. In this respect, a data transfer takes place.

Please be aware that we have no control over the type and amount of information that Apple collects about you when you register for our Service using the Apple login. If you do not want Apple to collect information about you in relation to your use of our Service, you should not use the Apple login.

You may dissociate your eharmony account from your Apple-ID at any time in your profile on our website. In this case, we will need your access data, as mentioned above.

For more information about the types of information collected by Apple and how Apple uses your information, as well as about your rights and your ability to protect your data, please see [Apple's privacy policy](#).

### During registration via Facebook ("Facebook Login")

Alternatively, you can register to join the eharmony Service using your Facebook account. If you choose to do this, we will receive the information that we need for your registration directly from Facebook. Facebook will also provide us with your email address that is associated with your Facebook account. In this respect, a data transfer takes place.

Please be aware that we have no control over the type and amount of information that Facebook collects about you when you register for our Service using the Facebook login. If you do not want Facebook to collect information about you in relation to your use of our Service, you should not use the Facebook login.

You may dissociate your Parship account from your Facebook-ID at any time in your profile on our website. In this case, we will need your access data, as explained above.

For more information about the types of information collected by Facebook and how Facebook will use your information, as well as about your rights and your ability to protect your data, please see [Facebook's privacy policy](#).

### Data required in connexion with a Basic Membership

Our Service works by providing your profile information ("profile") and your compatibility scores to other eharmony users. In order to get the full benefit of our Service and to set up your eharmony profile, we will ask you to provide us with personal data about you. This may include information about your personal values and preferences, your appearance, and any other characteristics that are relevant for us to establish your personality profile and to recommend potential partners ("matches") to you. When designing your profile, you will also need to provide us with information about yourself, including text and photos. In addition, we also collect information about you when you provide your answers to the eharmony test ("compatibility quiz") and we will use this information to automatically create your eharmony personality evaluation ("personality profile"). Please note that, although you will be able to read your personality profile and compatibility scores in your profile, your personality profile is not generally publicly visible to other eharmony members. Instead, those members who directly access your profile information will only have access to extracts of your personality profile and your compatibility points.

When we ask you to provide us with information about you during the registration process, we make it clear when such information will be kept private and will not be made available to

other users. Please note that your specific answers to eharmony's compatibility quiz are generally kept private, however, the compatibility scores that we generate from your answers are made publicly available to other members. Additionally, the information you voluntarily provide for hobbies and interests within the quiz will be visible to your matches in your profile, but you may update or delete this information at any time. All other information you provide us with for or as part of your eharmony profile will be publicly visible to other members on our website and our app, such as information that you voluntarily choose to include in your profile, especially your first name, place of residence / postal code, and your interests.

We will not be able to suggest matches for you if you do not provide us with the requested information relating to your sexual preferences (i.e. both preferred sex and gender), or the other information requested as part of the eharmony compatibility quiz. If you do not want to provide us with this information, you will not be able to use our Service.

Generally, the types of data that we will collect during the registration are as follows:

- » Residence / postal code
- » Country of residence
- » Date of birth
- » Full name
- » Height
- » Number of children
- » Marital status
- » Education level
- » Occupation
- » Income

In addition, you may choose to provide us with sensitive information such as:

- » Religion
- » Ethnicity
- » Political view.

By giving us this information, you agree that we store and use this information for matching purposes. This information allows us to further refine the match preferences and search criteria available to you when searching for a partner on our platform. This information will be disclosed in your profile, and therefore, visible to matches who visit your profile. However, please note that you do not have to provide us with this information in order to use the eharmony Service, and you may change your answers to "prefer not to specify" in the religion, ethnicity and/or political view fields at any time in your profile.

You may also upload photos of yourself in your profile, whereby other members may see, next to your first name, your photos clearly (i.e. unblurred version) in your profile or in a blurred version via email. Please note that you do not have to upload any photos in order to

use the eharmony Service. You may upload photos to your profile at any time, even after you completed your registration or already used the Service for a period of time.

You do not have to provide us with your mobile phone number in order to use the eharmony Service. However, if you want to, you can provide it to us for an additional security measure (known as “SMS verification”). This functionality is available to all our members but only after logging in to our eharmony Service. This will allow us to carry out a further identification check to make sure that you are the right person to be using your profile – please see more on this below.

### Upon Completion of a Premium Membership

If you decide to sign up for eharmony’s Premium chargeable features (“Premium Membership”) via the website (i.e. you decide to become a Premium member), we will collect your payment data during your order. However, please note that your credit card data is not stored by us, but is instead stored by a third party payment provider.

If you purchase a Premium Membership via an app store provider (e.g. Google or Apple), please refer to the terms of use of the relevant app platform operator to find out which personal data they process in relation with the purchase process. eharmony does not process any payment or billing data in this respect.

### Communication with the members, communication with our customer care and communication via video chat

If you correspond with other eharmony members through the eharmony platform, or with eharmony customer care, we will collect and store this information. The messages sent between members via our Service are end-to-end encrypted.

If you contact our customer care, please note the following: if you communicate with our customer care:

- (1) using the online contact form: the content of your message to us will be encrypted in transit; our reply will be protected in transit, provided that your email provider supports Transport Layer Security (TLS) transfer encryption;
- (2) via email: the content of your message to us will only be protected in transit via TLS transfer encryption if your email provider supports TLS transport encryption.

If you would prefer not to contact our customer care by email (for example, because you are concerned that your email provider does not support TLS encryption or the content of our email is not encrypted), please contact eharmony by post or fax instead. You will find our contact details under [Contact](#).

As a Premium Member, as well as in some promotions for Basic Members, you have the opportunity to communicate with other members via video chat in selected countries. For

this purpose, eharmony uses a service provider based in the USA with whom eharmony has a data processing agreement. eharmony transfers your IP address and your profile ID to this service provider when using the video chat feature. The service provider also stores data regarding the time and duration of any video chat calls. This data processing is necessary technically and for billing purposes. The video communication is encrypted end-to-end. Video and audio content is not stored. eharmony does not collect or transfer any other data in connection with video chat. If you do not want eharmony to transfer your IP address and your profile ID to its service provider, or do not want the time and duration of the chat to be stored, you should not use the video chat function.

### Promotional emails - Messages

When you subscribe for our free membership ("Basic Membership"), you must enter your email address on the welcome page, or we receive your email address from Apple/ Facebook (if you register via a third party login). Unless you opt out in the registration process, we will use this email address to send you promotional emails about eharmony's free and for-purchase products.

In your profile under "Notification options," you can also choose to receive personalised matches and guidance during your eharmony membership, to help you to get the most out of the eharmony Service.

As long as your email provider supports "Transport Layer Security" (TLS) transport encryption, these promotional emails (including our personalised guidance) are protected in transit via TLS transfer encryption.

**You can object to our use of your email address for promotional purposes or personal guidance, upon registration or later at any time, either by: (i) clicking on the link in our emails to adjust your email notification settings, (ii) adjusting your settings in your profile under "[Notification options](#)", or (iii) contacting us using the information in the [Contact](#) section. Members who have not yet completed the compatibility quiz may use this [link](#) for an objection.** You may re-subscribe to receive such emails in your profile under "[Notification options](#)" at any time.

### Push Messages

Within the use of the app, you may receive "push messages" from us, even when you are not currently using the app. These will either contain messages that we send you as part of our Service, or they may contain advertising information.

You can stop receiving push messages or adjust your settings at any time by changing the configuration settings of your mobile device or in the eharmony app.

## What information does eharmony collect when using the eharmony website?

Every time you access the eharmony website, we will collect your usage data. This means that, even if you have not signed up to be an eharmony member, we will collect and use this information about you. This data is sent to us by your Internet browser and is stored in log files. This data includes:

- » Information about your browser type and your internet service provider, as well as your operating system (for example Windows 7, Apple OS, etc.)
- » The IP address (Internet Protocol address) of the device you use to access our website or Service (for example, your computer, tablet or smartphone). We will also compare your IP address against a geo-database to collect information about your location, such as your country, state and city. In this context eharmony uses MaxMind (see explanations below)
- » Information about the page that you have accessed
- » The date and time that you used the website
- » The referrer URL (origin URL) from which you came to the page that you have accessed
- » Statistics about the amount of data transmitted during your use of the website
- » Status message as to whether you were successfully able to access the website
- » Session identifier
- » Session participant's pseudonym
- » Screen resolution used on your device

Each time an eharmony member logs in to our network, we also collect their eharmony user identifier.

While using the website, and in addition to the data mentioned above, cookies or pseudonym IDs (such as user-ID, ad-ID) are also stored on your device, when you visit, or after you visited, our online content. You will find specific information about this [here](#).

## What information does eharmony collect when using the eharmony app?

Every time you access the eharmony app with your device, eharmony automatically collects data and information from your device's operating system. This includes, among other things, the storage of your IP address. In detail, eharmony collects:

### Usage data

Every time you access the eharmony app, we will collect your usage data. This data includes:

- » The operating system used to access the app and, if necessary, the browser type
- » Your current language setting in your device
- » Information about your Internet service provider



- » The IP address (Internet Protocol address) of your device
- » Your Device ID (e.g. UDID) to identify your device for a secured authentication
- » Your User identifier on the eharmony platform (only for eharmony members)
- » Information about the part of the app that you have accessed and, if applicable, the webpage you accessed previously
- » The date and time that you used the app
- » Statistics about the amount of data transmitted during your use of the app
- » Status message as to whether you were successfully able to access the app
- » Session identifier

### Login data

We also collect the following usage data each time an eharmony member logs in to our network ("login records"):

- » Date and time of login
- » User identifier on the eharmony platform (your e-mail address)
- » IP address (Internet Protocol Address)
- » Device ID (e.g. UDID) to identify your device for a secured authentication.

While using the app, and in addition to the data mentioned above, pseudonym IDs (such as user-ID, ad-ID) are also stored on your device, when you visit, or after you visited, our app. You will find specific information about this [here](#).

### GPS data when using the app

If a Premium Member turns on the "radius search" option, we also collect location data about their device (such as GPS, possibly WLAN information, and device ID) to determine their location. This information will be used to allow the Premium Member to set a suitable search radius to look for other members.

### What information does eharmony process when you use the eharmony platform?

Part of our Service is providing you with potential partners ("matches"). These matches are presented to you in your profile and via notifications (e.g. emails), with the following information: first name, age, place of residence or postal code, a photo, compatibility score and a link to their profile. Please note that we may present you at any time as a match to other members, including those based outside the UK and/or using one of our other eharmony platforms. As such, your first name, age, place of residence or postal code, photo, compatibility score and a link to your profile will be provided to these members. In general, Basic Members will see only your photos blurred, but may be able, in some instances, to see your photos clearly. Premium Members will see your photos clearly.

In your profile, under “Notification options”, you may choose to receive notifications from us (e.g., emails or push messages) to alert you when there has been activity in your account (e.g. you have received a new message or we have new matches for you). Please note that if you do not choose this notification option, your matches who have requested notifications may still receive notifications related to you (e.g., when you send them a new message or we send your profile as a suggested new match). As such, and as mentioned above, your first name, place of residence or postal code, photo, age, compatibility score and a link to your profile may appear in such notifications.

You may also request to be informed about: (1) which matches visited your profile (“visitors of my profile”) and/or (2) if your matches are currently online (green circle if they are online, or grey circle if they are not). Please note that if you do so, the same information regarding your activity will be available to your matches who have also selected these notification options. As such, and subject to a match’s notification settings, (1) a match whose profile you visited may be informed of your visit, and (2) your matches may be notified when you are online or offline.

In addition, you are able to see the last time a match was online (“last time online”), and your matches are also able to see when you last logged in. This feature is set up automatically and, for technical reasons, cannot be deactivated.

## Processing purposes

eharmony processes the personal data of its users for the following purposes:

- » To provide our services as described in our [General Terms and Conditions](#). (The legal basis for our use of this information is contractual necessity, i.e. to provide you with the services you have asked for from eharmony. The legal basis for our use of sensitive data is your consent.).
- » For the prevention of and defence against abuse. eharmony automatically collects, processes and uses personal data and geodata we collect during your registration and the completion of the eharmony compatibility quiz and/or your eharmony profile, to check for any evidence of the misuse of our Service. This information is stored in a database and compared against empirical values and information. If our automated processing activities suggest that our Service has been misused, an eharmony employee will review the relevant rating and underlying clues, as well as the information in your profile (including any wording and photos you have provided) to confirm whether this is the case. In addition, Customer care representatives perform profile checks to check members’ profiles that have been reported by other members through the function “suspicious profile?” or as having breached our General Terms and Conditions. Furthermore, as mentioned above, if you have provided your mobile phone number, eharmony may use this information to carry out an identity check (SMS verification),(i.e. to check that you are who you

say you are). (The legal basis for these activities is the legitimate interests of eharmony and our eharmony members, to ensure that the eharmony Service is not used in a way that is in breach of our General Terms and Conditions and/or the law. In doing so, we also comply with our legal obligation regarding data security to guarantee system security and to detect and trace unauthorised access attempts or accesses.)

- » For automated price determination reasons. (The legal basis for these activities is contractual necessity.)
- » To ensure that you comply with your obligations under your subscription and our General Terms and Conditions, including your payment obligation (which concerns only Premium members). If you do not pay outstanding invoices / instalments despite repeated reminders, we will transfer the data that are required for the execution of a debt collection procedure to a debt collection service provider for the purpose of fiduciary debt collection. (The legal basis for these activities is contractual necessity, but it is also within the legitimate interests of eharmony to ensure that (as applicable) you provide the agreed payment for our Service in accordance with your subscription.)
- » For the protection and defence of our rights and the fulfilment of legal obligations. (The legal basis for these activities is the fulfilment of our legal obligations and our legitimate interest in asserting and defending our rights.)
- » For the purposes of sending advertising relating to our own products through promotional emails and personalised guidance. (The legal basis is our legitimate interests in relation to sending direct marketing about our own products. The legal basis in some instances is also your consent.)

[Here](#) you will find the processing purposes and legal basis for the processing of personal data regarding the use of "cookies" and other tracking technologies when using the eharmony website. [Here](#) you will find the processing purposes and legal basis for the processing of personal data regarding the use of tracking technologies when using the eharmony app.

## **Transfer of data to third parties; service provider**

eharmony generally only discloses your personal data to third parties for the provision of the Service to you, or if we have your consent. If we disclose your personal data to third parties on the basis of a legitimate interest, we will explain the legitimate interest in this privacy policy.

We may share your personal information within our group of companies, and other entities within our group may also store and/or process your information in accordance with this privacy policy.

In addition, we may disclose your personal data to third parties where we are obliged to do so by law, a regulator or a court order.

### Transfers to service providers

eharmony may use service providers when collecting or processing your personal data. eharmony will ensure that any service provider only receives that portion of your personal data that the service provider needs for their specific activity.

In addition to those already expressly mentioned in this privacy policy (e.g. under Cookies & Tracking), eharmony uses, amongst others, service providers to send promotional emails and push messages to members. In addition, eharmony uses service providers to provide our servers. If you subscribed to your Premium Membership over the website, we also use external payment services and service providers to help us with the settlement of payments and debt collection. Depending on the particular payment method you choose when purchasing your Premium Membership over our website, eharmony will send your payment information to the bank or to the particular payment service provider that we have appointed. Please be aware that such payment service providers will be responsible for their use of your personal data for their own purposes (i.e., to process your payment). As such, the privacy policy of the respective payment service provider will also apply.

Generally, the service providers that we appoint are engaged as our processor and may only use the personal data of our members in accordance with our instructions.

Please note that if you purchase a Premium Membership over the eharmony app, eharmony will not process any payment. In this case, the app store operator will be responsible for handling the payment process.

## How do we protect your personal data?

eharmony uses a variety of security measures, including state-of-the-art encryption and authentication tools, to protect the security, integrity and availability of our customers' and users' personal data. In particular, these measures include the following:

- » Strict criteria for the authorization to access your data as well as random 2-factor authentication,
- » Storage of confidential data in encrypted form,
- » Firewall protection of IT systems to prevent unauthorized access,
- » Permanent monitoring of access to IT systems to detect and prevent the misuse of personal data.

In this context, we recommend that you familiarise yourself with eharmony's security tips when using the eharmony service. [Here](#) you can find more information on this topic.

In this context, eharmony also uses service providers from the USA, each of them being subject to the EU-US Privacy Shield certification. In particular, the following service providers are involved:

### Cloudflare

In order to secure this website and optimize loading times (e.g. bot detection, account takeover, SSL certificate) we use a "Content Delivery Network" (CDN). This CDN is a service of Cloudflare, Inc, 101 Townsend St, San Francisco, CA 94107, USA. Therefore, registration and login requests are routed through the Cloudflare server and consolidated into statistics that cannot be deactivated.

We have an agreement with Cloudflare for order processing, based on Cloudflare's EU-US Privacy Shield certification.

[Here](#) you can find information about the data collected by Cloudflare.

### MaxMind

eharmony uses the GeoIP2 Precision City geolocation service from MaxMind, Inc, Waltham, MA, 14 Spring St., Suite 3, Waltham, Massachusetts 02451, USA. With this service, we use IP addresses to determine approximate location/geolocation data based on the country of origin. No personal data is exchanged with MaxMind. MaxMind, Inc. is subject to the EU-US Privacy Shield certification.

[Here](#) you can find further information about MaxMind.

## Duration of storage; retention obligations

We store your data for as long as is necessary for the provision of our Service (Basic and Premium Memberships) and any associated services or where we have a legitimate interest which permits the further storage of that information. In all other cases, we will erase your personal information once it is no longer necessary, except for any information we need to retain in order to comply with any contractual or statutory (e.g. tax or commercial) retention periods (e.g. invoices).

For Basic Members: You can choose to remove the data in your profile at any time. You can also erase your profile data yourself (when you have completed the compatibility quiz) by logging in to the eharmony website and starting the deletion process. Otherwise, eharmony automatically erases personal profile data of Basic members who are inactive for 24 months.

For Premium Members: Your personal data will be stored for the duration of our contractual relationship. However, we will erase your data following your request as long as there is no legal storage obligation that applies to that information. If your data is subject to a mandatory storage period, we will ensure that this information is isolated and stored until the expiry of the retention period. Once your Premium Membership is over, if you do not ask us to erase your data before your Premium subscription comes to an end, your Premium

Membership will be converted into a Basic Membership. In this case, the description above relating to the retention period of Basic members' data will apply.

If you uninstall the eharmony app on your device, this will not delete the data in your profile. The above statements related to the deletion of Basic Members' data and Premium Members' data also apply here.

Log files are stored by eharmony for 30 days and then deleted. Log files whose further retention is required for evidentiary purposes are exempt from deletion until the incident is finally resolved and may be forwarded to investigative authorities as appropriate in individual cases.

Please note that if the deletion of your data is prevented due to a mandatory retention period, your data will be blocked and stored for no other purposes, until we can delete it.

eharmony will also store any personal data which is required to demonstrate that eharmony has lawfully complied with a valid data subject's rights request within the required period.

## **Rights of the data subject at a glance**

You have the right to access, and -under certain conditions- to rectify, erase, restrict or object to the processing of your personal data, as well as the right to data portability.

You can also object at any time to the processing of your personal data for advertising purposes ("object advertising "). Please take into account that for organisational reasons, there may be a time lapse between when you submit your request and when we are able to remove your data from an ongoing campaign. Please also note that your objection will not affect the lawfulness of any processing that occurred prior to the date on which you objected to this activity.

By using our Service, you will have provided us with information about your sexual orientation (such as your gender and your sexual preferences). You can withdraw your consent to our use of this information at any time. However, please note that any withdrawal of your consent will not affect the lawfulness of our processing of such data prior to the date on which you withdrew your consent. In addition, once you have withdrawn your consent, we will no longer be able to provide you with matches or our Service.

By using our Service, you may have provided us with sensitive information about your religion, ethnicity and/or political view. You can withdraw your consent to our use of this information at any time. To do so, you should change your answers to "prefer not to specify" in the religion, ethnicity and/or political view fields (as appropriate) in your profile. However, please note that any withdrawal of your consent will not affect the lawfulness of our processing of such data prior to the date on which you withdrew your consent.

If you would like to exercise any of your rights, please use the information under [Contact](#). Please also ensure that when you do so, we will be able to clearly identify you.

Alternatively, you may use the setting options in your eharmony profile to rectify certain information that you provided during your registration or to object to advertising. You can also delete your data from an eharmony Basic Membership yourself in your profile. However, please note that Premium Members can only delete data regarding their Premium Membership by contacting our customer care. Lastly, please note that if we cannot delete your data due to a mandatory retention period, we will block (restrict) your data until it can be deleted.

### Right to lodge a complaint with a supervisory authority

You have the right to file a complaint with a data protection authority. You can contact your local data protection authority or our appointed data protection authority. This is:

The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, Telephone Number: + 44 (0) 303 123 1113, Email: [casework@ico.org.uk](mailto:casework@ico.org.uk).

## Social Media

In general, if social media plugins are used, the providers of such plugins will store cookies. However, the social media buttons that we use on our website contain only text links to the respective social media pages, they are not properly a social media plugin. Therefore, eharmony will not transfer any data to the respective social media providers. The operator of the social media page is responsible for compliance with data protection law. You can get more information about their data protection practices in their respective privacy policies.

## Cookies & tracking technologies when using the eharmony website

### Cookies & Tracking

Our website uses cookies and other web tracking mechanisms.

A cookie is a small text file that is sent to your device when you access a website and is stored in your browser. If you then access the same webpage again, your browser will check its cookies and will recognize you as a returning user. Some cookies are automatically erased after the end of the browser session (these are "session cookies"), whereas other cookies are stored for a predetermined amount of time or permanently in your browser, before they erase themselves (these are "temporary" or "permanent" cookies).

While a cookie may distinguish your device, it will not name you. Almost every website uses cookie technology.

## What cookies and other web tracking mechanisms does eharmony use?

Eharmony classifies cookies into different categories depending on their function and purpose.

### "Essential" cookies

We use certain cookies to make sure that our website and our Service is easy, secure and safe to use. Without these cookies, services that you have asked for (such as a secure website and Service), would not be possible. This category of cookies includes:

- » Cookies that identify or authenticate our users to ensure that our Service is secure;
- » Cookies that ensure the security of eharmony's information system;
- » Cookies that control abuse;
- » Cookies that temporarily store certain user entries;
- » Cookies that store certain user preferences (such as your language choices).

A consent is not required to use "necessary" cookies. They cannot be deactivated.

### "Functional" cookies

We use "functional" cookies to record usage data about our users (e.g. which users have visited which of our subpages, etc.) and to evaluate this information statistically. We use this statistical information about your use of our website to improve its performance, to tailor our platform to the users' needs, to make it more user-friendly, to understand our market share and to conduct other market research.

### "Marketing" Cookies

We also use cookies for advertising purposes ("marketing" cookies) to collect and evaluate usage behaviour for the purposes of sending our members interest-based advertising about our products.

We also allow third parties to collect our users' data through "marketing" cookies or pixels placed on our website. These cookies allow us and other third parties to provide you with interest-based advertising that is based on an analysis of your usage behaviour (e.g., which banner ads you have clicked on, which subpages you have visited, etc.) on the internet and our website.

To this end, we work with various authorised service providers; and we use analytics tools (e.g., cookies) in our website. However, these tools will not use your IP address, or (if they do), they will shorten it immediately after collection (which means that it will be less clearly linked to your device). These tools will also generate user profiles by using analytics cookies or by evaluating log files. However, these user profiles will not be linked to your real-world information and will not name you.



The providers of these tools process your personal data as our processor in accordance with our instructions and not for their own purposes. However, in some instances, providers may act as a separate controller. As such, their respective privacy policies apply. You should also review these policies for further information about the types of activities they carry out.

### How can you manage, prevent the use of cookies or erase our cookies?

eharmony provides you with a consent management ("cookie banner") that allows you to decide which cookies you want to allow. You can change your choice at any time and may withdraw any consent you may have given subsequently. You can retrieve such setting options [here](#).

For the consent management we use the Usercentrics Consent Management Platform (Usercentrics) of Usercentrics GmbH, Rosental 4, 80331 Munich, Germany. Usercentrics collects log file data and consent data using JavaScript. This JavaScript allows us to inform users about their consent to certain cookies and other technologies on our website and to collect, manage and document such consent.

You can permanently disable JavaScript at any time via your browser settings. If you do so, Usercentrics will not be able to execute JavaScript. You can find further information about Usercentrics' data protection practices at: <https://usercentrics.com/privacy-policy/>.

You can manage (able/disable and erase) cookies on our website by using the functions mentioned above, and also via your browser settings. Most browsers allow you to manage your cookies by either accepting or rejecting all cookies or by agreeing to only certain types of cookies. To learn how to manage and erase cookies, please refer to the [help](#) function of your browser.

Please note, however, that if you choose to disable or remove cookies and other web tracking mechanisms, doing so may prevent certain features on our website from working properly and therefore affect your experience on our website. In addition, you may not be able to use all the features of our Service if you disable or remove cookies and other web tracking mechanisms.

### Specific Cookies and tracking mechanisms

You can find a complete overview of the web analytics tracking mechanisms that we use [here](#). We have listed each tracking mechanism and described their intended use, as well as other important information.

For further information and help with cookies and other web tracking mechanisms, please see [www.YourOnlineChoices.com](http://www.YourOnlineChoices.com).

## Appendix: Technical Notes Cookies

### **Internet Explorer:**

You can find further instructions regarding cookie management on Internet Explorer at <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies#ie=ie-11-win-7>

### **Mozilla Firefox:**

You can find further instructions regarding cookie management on Mozilla Firefox at <https://support.mozilla.org/en-US/kb/delete-cookies-remove-info-websites-stored>

### **Google Chrome:**

You can find further instructions regarding cookie management on Google Chrome at <https://support.google.com/chrome/answer/95647>

### **Safari:**

You can find further instructions regarding cookie management on Safari at <https://support.apple.com/en-gb/guide/safari/manage-cookies-and-website-data-sfri11471/mac>

## Tracking technologies when using the eharmony app

We need to collect and use statistical information about your use of our app in order to make it more user-friendly, to understand our market share, to conduct other market research and to make sure that we display relevant advertisements for you. We also need to collect and analyse information to prevent online fraud and abuse directed at our users and us.

To this end, we work with various authorised service providers; and we use analytics tools and tracking mechanisms in our app.

The providers of these tools process your personal data as our processor in accordance with our instructions. However, in some instances, these providers may act as a separate controller. As such, their respective privacy policies apply. You should also review these policies for further information about the types of activities they carry out.

### How can you manage, prevent the use of, or erase our tracking technologies?

You may object at any time to the collection, transfer and/or use of your data for analytics purposes by our tracking providers by unchecking the box at the bottom of this page under the section "Allow tracking". Once this checkbox is unchecked, your data will not be transmitted or used by our tracking providers. Please note however, that your objection will not affect the lawfulness of any processing that occurred prior to the date on which you objected to this activity.

## What specific tracking technologies does eharmony use?

### Google Analytics

We use Google Analytics tools for analytics purposes. Google Analytics is provided by Google Ireland Ltd, with registered address: Gordon House, Barrow Street, Dublin 4, Ireland ("Google"). We have chosen to use Google Analytics with an additional feature provided by Google that ensures the anonymization of all user IP addresses. Specifically, Google will shorten the IP address of any user within the EU (and, in exceptional cases, within the US) and will only store the shortened IP addresses in the US. Google provides us with analytics services on our behalf; and evaluates our user's use of our app in order to compile reports on app activity and to provide us with other services related to the app activity and our users' use of internet, such as Google Analytics demographics and interest reports.

We do not use the Google Analytics Advertising Features.

To the extent that Google uses this personal data for our and/or its own purposes, this is described [here](https://policies.google.com/privacy?hl=en) (<https://policies.google.com/privacy?hl=en>).

You may object at any time to the collection, transfer and/or use of your data for analysis purposes by this tracking provider by unchecking the box at the bottom of this page under the section "Allow tracking". Once this checkbox is unchecked, your data will not be transmitted or used by this tracking provider.

### Google Firebase

We use Google Analytics for Firebase and Firebase Crashlytics through the Google Firebase platform operated by Google Ireland Ltd (with registered address: Gordon House, Barrow Street, Dublin 4, Ireland; "Google"). Google Firebase offers a variety of features that are described at the following link: <https://firebase.google.com/products/>. As part of this service, Google may access and store the personal data of our users, such as content created by them, or information regarding user interaction with our apps. Firebase also provides the interfaces that permit our users to interact between our app and other services.

We use Google Analytics for Firebase and Firebase Crashlytics, which collect data such as: the first opening of the app, any uninstallation, updates, crashes, and the frequency of use of the app. Certain users' interests are also evaluated. To do this, Google will access the Channel ID of your device.

Information processed by Google Firebase may also be used in combination with other Google services (e.g. Google marketing services). Where this happens, information such as your Android Channel ID or (for iOS) your Ad Identifier is processed in order to identify your mobile device. For further information about how Google uses your data, please visit the following webpage <https://www.google.com/policies/technologies/ads>. Google's privacy policy is available at <https://www.google.com/policies/privacy>.

When we use the Google Firebase services, it is possible that your personal data may be transferred outside the EEA. However, Google is certified under the EU-US Privacy Shield. (<https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>).

You may object at any time to the collection, transfer and/or use of your data for analysis purposes by this tracking provider by unchecking the box at the bottom of this page under the section "Allow tracking". Once this checkbox is unchecked, your data will not be transmitted or used by this tracking provider.

## Adjust

We use "Mobile-Tracking Technologies" on our apps. In order to do this, we use an analytics service from adjust GmbH, whose registered office is: Saarbrücker Str. 38a, 10405 Berlin, Germany. With the help of these services, we collect statistical data about your use of our app in order to improve the usability of our app. To this end, we collect and analyse certain information from your mobile device. Specifically, the following data types are collected: your IP address (which is immediately hashed), your MAC address, your pseudonymised device ID (Identifier For Advertisers - IDFA or Google Advertiser ID - GAID), the type of browser you use, your language preference, your Internet service provider, your network status, your time zone, the URL of the page you use to access and leave the app, your time spent on the app and the date you access the app, your clickstream data and other statistical information about your use of our service. This information is used to create a pseudonymised user profile. However, it is not possible for us to re-identify you from this user profile.

For further information about how adjust uses your personal data, please see the adjust privacy policy [here](https://www.adjust.com/privacy-policy/) (<https://www.adjust.com/privacy-policy/>).

You may object at any time to the collection, transfer and/or use of your data for analysis purposes by this tracking provider by unchecking the box at the bottom of this page under the section "Allow tracking". Once this checkbox is unchecked, your data will not be transmitted or used by this tracking provider.

## Google Ads

We use an online advertising program, "Google Ads" which is an analytics service provided by Google Ireland Ltd (with registered address: Gordon House, Barrow Street, Dublin 4, Ireland) („Google"). Within Google Ads, we use the following features:

- Google Ads Conversion-Tracking. With this tool, we can determine whether you have clicked on an eharmony ad placed by Google. We use this information to generate conversion statistics to see how effective our advertising is. This information allows us to see if you have purchased our product or downloaded our app.
- Google Ads Remarketing. This feature enables us to target eharmony app visitors by displaying personalised, interest-based ads to these visitors when they visit other

webpages or apps in Google Display Network, or use Google's or a partner's search engine.

- Google Ads Similar Audience. Through this feature, we can extend our advertisements' audience appeal by sending targeted ads to other individuals who have similar interests to our members. Our aim is to reach individuals who are not directly looking for our products or services, but who may find them interesting because of their similar interests.

For more information about Google Ads and Google's privacy policy, please visit [here](https://policies.google.com/technologies/ads?hl=en) (https://policies.google.com/technologies/ads?hl=en).

You may object at any time to the collection, transfer and/or use of your data for analysis purposes by this tracking provider by unchecking the box at the bottom of this page under the section "Allow tracking". Once this checkbox is unchecked, your data will not be transmitted or used by this tracking provider.

## Facebook

We want to present "interest based advertising" on Facebook, while limiting the frequency that certain advertisements are displayed to individuals. To achieve this, we use the "Custom Audiences" tool operated by Facebook Ireland Ltd, whose registered office is: Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland ("Facebook").

Facebook uses a hashed, user-specific Facebook ID to assign Facebook users to a "Custom Audience" according to specific rules determined by us. Our ads will be then displayed on Facebook towards this "Custom Audience". However, ads are only displayed to a "Custom Audience" which contains more than 20 different users – therefore no inference can be drawn about the individual user's characteristics based solely on the ad placement. A Facebook user will only be assigned to a certain "Custom audience" for a maximum of 180 days. After this time, you will only be re-added to a "Custom audience" when you revisit our app (at which point the same rules will apply).

You can find further information about how Facebook complies with its data protection obligations [here](https://www.facebook.com/privacy/explanation) (https://www.facebook.com/privacy/explanation).

You may object at any time to the collection, transfer and/or use of your data for analysis purposes by this tracking provider by unchecking the box at the bottom of this page under the section "Allow tracking". Once this checkbox is unchecked, your data will not be transmitted or used by this tracking provider.

## iovation

We use fraud prevention services to detect and help prevent fraud in connection with our Services. These services are provided by a third-party service provider based outside the EEA, iovation Inc., 555 SW Oak Street #300, Portland, OR 97204, United States.

We will place iovation cookie on your device and run a JavaScript code provided by iovation Inc. to enable the collection of your IP address and certain identifiers of your device, such as device type, browser type, screen resolution, operating system etc. It does not collect directly identifiable personal data, although it can collect your IP address. This information will be shared with iovation Inc. for fraud prevention only.

For more information about how iovation Inc. processes your data, please see the description [here](#).

### Other tracking mechanisms

You can find a complete overview of the tracking mechanisms that we use in our platform [here](#). We have listed each tracking mechanism and described their intended use, as well as other important information.