



LION TECHNOLOGIES

## Privacy Notice for the wona.io platform and associated technology.

## Privacy Statement Summary:

To provide our wona services and related products, we must process information about you. The type of information that we collect depends on how you use our products. You can learn how to access and delete information that we collect in your account settings.

Who will use my data?	Data you share with us when you use our wonhub platform will be used by Lion Technologies and their partners to provide our services to you, offer the best possible experience, and of course operate our business.
What for?	<p>We will store and process your data in order to allow us to provide our services and products to you. We may also send you other information that we think you will be interested in. This may include information about our products and services, upgrades, offers, news, and information about your account and your relationship with us. We may also send you information about other companies and the products and services they provide which we think you might be interested in.</p> <p>Since this is a social media site the information you share online will be visible to potentially every user of this site. Other users may decide to share this information on other sites, download it, or use it for other purposes which are out of our control and no longer our responsibility.</p>
What will happen if I contact you?	If you contact us, visit of sites, download our app, or communicate with us in any way we will collect information about you. We will use your information send you the information you have requested and updates, offers and other information that we think you will be interested in. We will use this information to optimise our site and improve your experience.
What data will be stored?	<p>We will store your details in order to provide our online experience to you. We will store the personal details you share with us; information in posts, photos, videos, and other media you share, plus details of site visits, enquiries, purchase behaviour, and related financial information as required. We may store other information about you including information about your visit to the site, your click behaviour, and general activity on the site.</p> <p>We will store technical information and use tracking technology to collect additional data.</p>
What data will be shared?	We will not share your data with any third parties other than as described here and where necessary only with your consent. We may need to share your information with any regulator or legal body that requests it.
How long?	Your data may be stored indefinitely however we respect your rights under GDPR and will always respond to requests to stop processing, limit processing, delete data, provide copies of data held, etc....
Who can access my	We will take care of your data at all times and have established appropriate controls to ensure only authorised people and companies have access to your data.

data?	We will never share or otherwise distribute your data to any other third party.
How is my data kept secure?	We will store your data on secure servers which will be processed in the UK. We use industry standard security protocols/technology to secure data. Where data is transferred outside the EU we will ensure appropriate technical and administrative controls are in place.

## About This Privacy Policy

This policy sets out how we will use and share the information that you give us. This policy describes your relationship with Lion Technologies. The General Data Protection Regulation (GDPR) describes how organisations must collect, handle, process and store personal information. These rules apply regardless of whether data is stored electronically, on paper or on other materials. To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully. GDPR is underpinned by eight important principals. These say that personal data must:

- Be processed fairly and lawfully
- Be obtained only for specific, lawful purposes
- Be adequate, relevant and not excessive
- Be accurate and kept up to date
- Not be held for any longer than is necessary
- Processed in accordance with the rights of the data subjects
- Be protected in appropriate ways
- Not be transferred outside the European Economic Area, unless that country or territory also ensures an adequate level of protection

We take these responsibilities seriously; this document describes our approach to data protection. This policy helps to protect us from data security risks, including:

- Breaches of confidentiality. For instance, information being given out inappropriately.
- Failing to offer choice. For instance, all individuals should be free to choose how the company uses data relating to them.
- Reputational and financial damage. For instance, the company could suffer if hackers successfully gained access to sensitive data.
- Any other form of loss, damage, harm however caused as a result of a failure to meet data protection regulations.

## Who We Are And How To Contact Us

Lion Technologies is registered in United Kingdom and is registered with the Information Commissioner's Office. The Data Protection Office is: Adam Brogden. You can contact the DPO in any of the following ways:

Data Protection Officer: Adam Brogden  
Email: [adam.brogden@optindigo.com](mailto:adam.brogden@optindigo.com)  
Tel: +44 1772 217772  
Web: <https://optindigo.com>

## Who this privacy policy applies to

This policy relates to users of wona and all other properties owned by Lion Technologies. Processing of your data is required in order to provide these sites, apps and associated services to you. This policy applies to individuals who have shared their data with us as either a user, customer, employee, supplier or in any other capacity.

It applies to all data that the company holds relating to identifiable individuals, even if that information technically falls outside of the GDPR. This can include:

- Names of Individuals
- Personal details
- Contact details
- Employment, education, and career information
- Company and professional information
- Sensitive personal data
- Images, video and other media
- Information we collect from other sources including public domain, social media, and other third parties
- Information provided about you by other people / companies / third parties
- All other data shared with us by you [content. posts, media etc..]

## What this policy applies to

This section describes the lawful basis for processing your data and applies to the information about yourself that you choose to provide us with or that you allow us to collect. This includes:

- The Information you provide when you contact us
- Information provided when you create an account and interact with us
- When you use our sites and services
- Information relating to products and services we offer to you and other transactions including financial and other personal information required to complete these transactions
- Information that is given and stored as part of our ongoing relationship

We may collect or process sensitive data about you, where this is the case we will take appropriate precautions to collect, store, and process this data safely.

## How your information will be used

We will only use your personal data for the purposes for which we collected it and as you would reasonably expect your data to be processed and only where there is a lawful basis for such processing, for example:

Purpose/Activity	Type of data	Lawful basis for processing
To register you as a new user	(a) Identity, (b) Contact, (c) Personal information, (d) Sensitive personal information (d) profile information	(a) with your consent (b) Performance of a contract with you, (c) Necessary for our legitimate interest
To process and deliver the services and products you request including managing payments, fees and charges, and to collect and recover money owed to us	(a) Identity, (b) Contact, (c) Financial, (d) Transaction, (e) Marketing and Communications	(a) Performance of a contract with you, (b) Necessary for our legitimate interests
To manage our ongoing relationship with you which will include notifying you about changes to our terms, products and services, or privacy policy, to maintain our records	(a) Identity, (b) Contact, (c) Profile, (d) Marketing and Communications	(a) Performance of a contract with you, (b) Necessary to comply with a legal obligation, (c) Necessary for our legitimate interests to keep our records updated and to study how customers use our products
To administer and protect our business and our site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity, (b) Contact, (c) Technical	(a) Necessary for our legitimate interests for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise, (b) Necessary to comply with a legal obligation
To deliver relevant content and advertisements to you and measure and understand the effectiveness of our advertising.	(a) Identity, (b) Contact, (c) Profile, (d) Usage, (e) Marketing and Communications, (f) Technical	Necessary for our legitimate interests to study how customers use our products, to develop them, to grow our business and to inform our marketing strategy
To deliver our services and personalise content and pages. Including localisation,	(a) Identity, (b) Contact, (c) Profile, (d) Usage, (e) Marketing and Communications, (f) Technical	Necessary for our legitimate interests to study how customers use our products, to develop them, to grow our business and to inform our marketing strategy
To optimise your site experience - to allow you to contribute to the content on the site and supply the content	(a) Identity, (b) Contact, (c) Profile, (d) Usage, (e) Marketing and Communications, (f)	(a) with your consent, (b) for our legitimate interest [Necessary for our legitimate interests to provide the best experience to our users.]

and media we think you will be interested in.	Technical	
To use data analytics to improve our website, conduct R&D, develop our products and services, marketing, customer relationships and experiences	(a) Technical, (b) Usage	Necessary for our legitimate interests to define types of customers for our products and services, to keep our site updated and relevant, to develop our business and to inform our marketing strategy
To make suggestions and recommendations to you about content [posts, media, adverts, other info] that may be of interest to you	(a) Identity, (b) Contact, (c) Technical, (d) Usage, (e) Profile	Necessary for our legitimate interests to develop our site and grow our business

We may collect and process information about you, including your name, address, contact details (including email address and mobile phone number), profile details and visit history. We may take personal information from:

- Information that you provide to us when registering with our website (including your email address, personal information, contact information, other sensitive information)
- Information that you provide when completing your online profile (including your name, gender, date of birth and any educational details and employment details you provide)
- Information that you visit our sites including your behaviour, preferences, and the technical information required to support this analysis
- Information relating to any purchases you make of our services, including any other transaction details made via any of our websites
- Personal data we receive will be used for the purposes it was provided including:
  - To carry out our obligations arising from any contracts entered into between you and us including the provision of our products, and to respond to queries from you regarding those contracts
  - To manage and administer the relationships between you and us
  - To notify you about changes to our products and to otherwise communicate with you; for example, we will use your contact details in order to respond to any queries that you submit to us
  - To obtain feedback from you regarding us
- We also collect the content, communications and other information you provide when you use our site, including when you create or share content and message or communicate with others. This can include information in or about the content that you provide (e.g. metadata), such as the location of a photo or the date a file was created.
- We collect information about how you use our site, such as the types of content that you view or engage with, the features you use, the actions you take, the people or accounts you interact with and the time, frequency and duration of your activities.

- We also receive and analyse content, communications and information that other people provide when they use our Products. This can include information about you, such as when others share or comment on a photo of you, send a message to you or upload, sync or import your contact information.
- We collect information from and about the computers, phones, connected TVs and other web-connected devices you use that integrate with our Products, and we combine this information across different devices that you use.

In accordance with your preferences, we may also use your personal information to provide you with information about products and services, content, promotions and offers that may be of interest to you. We may use your personal information in order to ascertain the promotions and offers that are likely to be of particular interest to you. This document explains how you can change whether to receive this information. Please note that, even if you choose not to receive this information, we may still use your personal information to provide you with important communications, including communications in relation to any purchases you make.

## How to change your preferences

We operate in line with EU GDPR (May 2018) data protection guidelines. We respect your rights and will respond to any request for access to personal information and requests to delete, rectify, transfer, data and to stop processing. We will also advise you on how to complain to the relevant authorities, namely the Information Commissioner's Office. Any requests or objections should be made in writing to the Data Controller or you can visit our website, call, or email us to contact us to change your preferences at anytime.

## Scope of Agreement

By submitting your personal data on this site or as required for us to provide our services to you, you are affirming your agreement for such information to be used in accordance with this privacy policy. You will be able to change your preferences at any time by the methods described as prescribed in this document.

We may from time to time use your information for marketing, account management or relationship management purposes. The main purpose of this is to provide you with information about goods which we think may be of interest to you and/or to maintain any existing relationship we may have with you.

## Opting out at a later date

Where you give your consent for us to process your data, for example when you agree to us sending you marketing information or where you agree to us processing financial data, you can contact us to amend or withdraw your consent at anytime. You can also choose to object to processing and request deletion of your data. We respect all user rights as defined in GDPR. If you have any comments or wish to



complain please contact us.

## How we store and process your data

Your data will be collected stored and processed securely, we may transfer your data outside the EU, if this is the case we will ensure appropriate technical and administrative controls are in place to keep your data safe. Your data may be stored indefinitely to ensure we have records of all interactions we have with you.

In order to provide our products to you, we use recognised third parties to take payment, conduct credit reports and other checks, manage our company accounts and provide banking services. We will store transactions, payment and order data for up to 7 years or for as long as required by UK financial and company regulations. These third parties may operate outside the EU, if this is the case we will ensure precautions are in place to protect your data.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to find out more about how the processing for the new purpose is compatible with the original purpose, please email us. If we need to use your personal data for a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal ground of processing.

We may be legally obliged to disclose your personal information without your knowledge to the extent that we are required to do so by law; in connection with any ongoing or prospective legal proceedings; in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk); to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.

You will only receive marketing communications from us if you have:

- Requested information from us or used our services
- If you provided us with your details given appropriate consent
- You have not opted out of receiving marketing

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

## Our obligations

We are a data controller. In relation to the information that you provide to us, we are legally responsible for how that information is handled. We will comply with the GDPR (2018) in the way we use and share your personal data. Among other things, this means that we will only use your personal data:

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- Fairly and lawfully
- As set out in the legislation and this policy
- To the extent necessary for these purposes
- We will take steps to ensure your data is accurate and rectify data as necessary

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- 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 can see more about these rights at: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

### Third Parties

We work with third-party partners who help us provide and improve our service. We don't sell your information to anyone and we never will. We also impose strict restrictions on how our partners can use and disclose the data we provide.

We may have to share your personal data with the parties set out below for the purposes described in this document:

- Our Data Protection partner – <https://optindigo.com>

- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, credit scoring, banking, legal, fraud protection, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances.
- We provide advertisers with reports about the kinds of people seeing their ads and how their ads are performing, but we don't share information that personally identifies you
- We share information about you with companies that aggregate it to provide analytics and measurement reports to our partners
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

By creating content, posting, or sharing your content will be available to the audience you specify. This audience may re-share your material without your permission or knowledge.

## Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know such data. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We will report any breaches or potential breaches to the appropriate authorities within 24 hours and to anyone affected by a breach within 72 hours. If you have any queries or concerns about your data usage, please contact us.

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## Cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information

about your preferences. We use traffic log cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

As well as your ability to accept or reject cookies, we also require your permission to store cookies on your machine, which is why when you visit our site, you are presented with the ability to accept our terms of use, including the storage of cookies on your machine. Should you not accept then you are free to leave our website, at any time.

### Legitimate Interests

Under the GDPR, we are also permitted to share some information with third parties who use such data for non-marketing purposes (including credit and risk assessment and management, identification and fraud prevention, debt collection and returning assets to you).

### Contacting us, exercising your information rights and Complaints

If you any questions or comments about this Privacy Policy, wish to exercise your information rights in connection with the personal data you have shared with us or wish to complain, please contact: Adam Brogden [contact details below]. We will process SARs within 30 days, SAR responses are usually free but we reserve the right to charge for excessive or unfounded requests. We fully comply with Data Protection legislation and will assist in any investigation or request made by the appropriate authorities.

Data Protection Officer: Adam Brogden

Email: [adam.brogden@optindigo.com](mailto:adam.brogden@optindigo.com)

Tel: +44 1772 217772

Web: <https://optindigo.com>

If you remain dissatisfied then you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire, SK9 5AF  
[www.ico.org.uk](http://www.ico.org.uk)