## **Privacy Policy**

Last updated: October 19, 2023

# **About Alfredus Prosperitas and this Privacy Policy**

Alfredus Prosperitas LLC ("Alfredus") has its registered offices at 205 E 63<sup>rd</sup> Street, 15D, New York NY 10065, United States of America, registered under the number EIN- 88-3006483. In this Privacy Policy, we use the term Alfredus (and "we", "us" and "our") to refer to the head office of Alfredus at the registered address above and our affiliates.

Please take a moment to read the following Privacy Policy that explains how we collect, use, disclose and transfer the personal information that you provide to us on our applications ("applications") if you are a user of them. This includes information we collect through the use of cookies and related technologies when you use the App.

This Privacy Notice also applies to data we collect and process about you from third parties or in connection with the App, for example if you are invited by another User of the App or if you feature in content on the App.

When we talk about "personal data", we mean any information which relates to an identified or identifiable living individual. Individuals might be identified by reference to a name, an identification number, location data, an online identifier (such as an IP address) or to other factors that are specific to them, such as their physical appearance.

This Privacy Notice also sets out your rights in respect of our processing of your personal data.

This Privacy Policy only applies to the use of your personal data obtained by us, whether from you directly or from a third party. It does not apply to personal data collected by third parties during your communications with those third parties or your use of their products or services (for example, where you follow links to third party websites over which we have no control, or you purchase goods or services from those third parties).

Alfredus complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) and the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce. Alfredus has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union and the United Kingdom in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF. Alfredus has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) Program, and to view our certification, please visit https://www.dataprivacyframework.gov/.

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, Alfredus commits to cooperate and comply respectively with the advice of the panel established by the EU data protection authorities (DPAs) and the UK Information Commissioner's Office (ICO) and the Swiss Federal Data

Protection and Information Commissioner (FDPIC) with regard to unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF.

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, Alfredus commits to resolve DPF Principles-related complaints about our collection and use of your personal information. EU and UK individuals and Swiss individuals with inquiries or complaints regarding our handling of personal data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF should first contact Alfredus at:

Director of Operations via email address: salman@alfredus.co

Alfredus falls under the umbrella of the investigatory and enforcement powers of the Federal Trade Commission (FTC).

You have the possibility, under certain conditions, to invoke binding arbitration. Alfredus is obligated to arbitrate claims and follow the terms as set forth in Annex 1 of the DPF Principles, provided that an individual has invoked binding arbitration by delivering notice to Alfredus and following the procedures and subject to conditions set forth in Annex 1 of Principles.

## **Updates to this Privacy Policy**

From time to time we may update this Privacy Policy. When we do, we will publish the changes on this App.

## What personal data do we collect?

In providing the App, we may collect and process different types of personal data about you for different processing purposes. The types of personal data we collect depends on who you are and how you use our App and includes the following:

Identity Data	First name; last name.
Contact Data	email address; telephone number;
Registration Data	Username, First name; last name; date of birth; gender; country; city; state.

Profile Data	Password; profile picture or avatar; your talents; your work; your hobbies areas of impact, cultural identity; interests or preferences; any other personal data that you may provide when you personalise your account with us; contact preferences; any personal data collected in relation to your attendance at an event; feedback and survey responses;.		
Behavioural Data	Data relating to your browsing activity or interaction with our emails, obtained through the use of cookies, pixel tags and other similar technologies; information about when your current or previous sessions started; pages visited and content viewed on the App, including time spent; page interaction information, such as scrolling, clicks and browsing methods; page response times and any download errors.		
Technical Data	IP address; browser type and operating system; geolocation, to ensure we're showing you the correct notices and information; any other unique numbers assigned to a device.		
Content Data	When Users upload content to the App ("Content") we will process any personal data that is contained in the Content.		
Communications Data	Communication preferences and content of any messages you send us.		

# How we collect and receive personal data

We collect and receive personal data using different methods:

Personal data you provide	You may give us your personal data directly, for example, when you			
to us	register your Profile on our App, interact with the App contact us with			
	enquiries, upload Content to the App, or provide feedback to us.			
Personal data we collect	When you access and use our App, we will collect certain Behavioural			
using cookies and other	Data and Technical Data. We collect this personal data by using cookies			
similar technologies	and other similar technologies (see the "Cookies and other information			
	that we automatically collect" section below).			
Personal data received	We may receive personal data about you from third parties including			
from third parties	people who know you and think you might be interested in joining our			
	applications.			
Publicly available personal	From time to time, we may collect personal data about you (Identity Data,			
data	Contact Data or Profile Data) that is contained in publicly available			
	sources (including open source data sets or media reports) or that you			
	or a third party may otherwise make publicly available (for example			
	through speeches at events or publishing articles or other news stories			
	or posts on social media platforms).			

As the accuracy of your personal data depends largely on the information you provide to us, kindly inform us as soon as practicable if there are any errors and/or inaccuracies in your personal data or if there have been changes to your personal data. You can check and change your account information directly in the App, if necessary.

## What personal data do we collect?

We collect and process personal data from the following people:

App Users	If you register an account on, browse or interact with our App, we will				
	collect and process your personal data in connection with your				
	interaction with us and our App.				
Potential users	If you have been invited by an existing User to register with an account				
	on the App, we will collect and process your personal data in order to				
	verify and consider your application.				
People who feature in	If you feature in any Content uploaded by us (including if you are a public				
Content, comments or are	figure) or by users on the App, or if you are mentioned in a comment or				
otherwise mentioned on	otherwise on the App, we will process any personal data associated with				
our App	this				
Event attendees	If you attend one of our events, we will process personal data about you				
	in connection with your attendance at the event. For example, we may				
	ask you to complete a registration or feedback form, or other document				
	relating to the event.				

## How we use your personal data

We will only use your personal data when the law allows us to. We only use your personal data for the purposes set out in this Privacy Notice or for a compatible purpose, if we reasonably consider that we need to use it for that purpose and that reason is compatible with the original purpose.

If we wish to make any changes to the purposes set out in this section, or if we wish to use your personal data for any purpose that is not listed in this section, we will notify you using the contact details we hold for you.

The main purposes for which we use your data are:

- To provide you with our App;
- Event Management
- To manage our relationship with you
- To deal with user enquiries, carry out surveys and obtain feedback;
- To carry out insight and analysis; and
- For business administration and legal compliance purposes

Please see "Details of our Data Processing" section below for more details on the purposes for which we use your data and the legal bases on which we rely.

## Cookies and other information that we automatically collect

Like most platforms, Alfredus logs IP addresses and uses cookies and similar technologies ("Cookies") that allow us to recognise you and to customise your experience, and provide us with information about the way our visitors access our App. You can find out more about how we use cookies and related technologies below.

#### What is a cookie?

Cookies are text files, containing small amounts of information, which are downloaded to your computer or mobile device when you visit a website or mobile application. They are used to recognise your computer as you move between pages on a website, or when you return to a website or mobile application you have visited previously. Cookies are widely used in order to make platforms work, or to work more efficiently, as well as to provide information to the owners of the platform.

We use cookies to enhance the online experience of our visitors (for example, by remembering your language and/or product preferences) and to better understand how our App is used. Cookies will tell us, for example, whether you have visited our App before or whether you are a new visitor. They can also help to ensure that adverts you see online are more relevant to you and your interests.

There are two broad categories of cookies:

- **First party cookies,** served directly by Alfredus to your computer or mobile device. They are used only by Alfredus to recognise your computer or mobile device when it revisits our App.
- Third party cookies, which are served by a third party service provider on our App, and can be used by the service provider to recognise your computer or mobile device when it visits other platforms. Third party cookies are most commonly used for platform analytics or advertising purposes.

Cookies can remain on your computer or mobile device for different periods of time. Alfredus uses both 'session cookies' and 'permanent cookies'. Session cookies exist only while your browser is open and are deleted automatically once you close your browser. Permanent cookies survive after your browser is closed, and can be used to recognise your computer or mobile device when you open your browser and browse the internet again.

## What cookies does Alfredus use?

The App serves only the following types of cookies to your computer or mobile device:

Type of Cookie	Purpose		
Cookies necessary	These cookies are essential to provide you with services available through the		
for essential	App and to use some of its features, such as access to secure areas. Without		
purposes	these cookies, services you have asked for, like transactional pages and secure		
	login accounts, would not be possible.		
Functional	These cookies serve a variety of purposes related to the presentation,		
Cookies	performance and functionality of the App. Their overall purpose, however, is to		
	enhance visitors' experience and enjoyment of the App.		

	For example, some of these cookies enable visitors to specify language, product or other platform preferences.
Performance	These cookies are used to collect information about how visitors use the App.
Cookies	The information gathered does not identify any individual visitor and is aggregated. It includes the number of visitors to the App, the platforms that referred them to the App and the pages that they visited on the App.  We use this information to help run the App more efficiently, to gather broad demographic information and to monitor the level of activity on the App.
Social Cookies	These cookies enable users to share pages and content through third party social media and other platforms. The companies that serve these cookies may also use your information to serve targeted advertising on other platforms.

Further detailed information about the specific cookies used on the App and the third parties who serve them can be found in our cookie consent tool. You can use this cookie consent tool to control your cookie preferences.

#### How to control or delete cookies

We use non-essential cookies on the basis of your consent. You have the right withdraw that consent and refuse the use of cookies at any time and we have explained how you can exercise this right below. However, please note that if you choose to refuse cookies you may not be able to use the full functionality of the App.

You can set your cookie preferences by using our cookie consent tool.

[Note: FOR EU COOKIE & NON-COOKIE:][Further information about cookies, including how to see what cookies have been set on your computer or mobile device and how to manage and delete them, visit www.allaboutcookies.org and www.youronlinechoices.eu.] / [Note: FOR US COOKIE & NON-COOKIE:][If you would like to learn more, please visit http://www.aboutads.info/choices/. More detail on how businesses use cookies is available at www.allaboutcookies.org. We are not responsible for effectiveness of or compliance with any third parties' opt-out options.]

### IP addresses

We will collect information about your computer or mobile device, including where available your IP address, operating system, log-in times and browser type. We use this information to better understand how visitors use the App and for internal reporting purposes. We will anonymise and share this information with advertisers, sponsors or other businesses.

## **Location services**

Some of the services that we provide are able to use information about your location. For these services, which are typically available on mobile devices or applications, you are provided with the opportunity to provide your consent to the use of location services, which, for example, process information deriving from GPS, sensors, beacons or Wi-Fi access points in order to allow you to benefit from a more personalised

service. Your device will have settings that allow you to turn off these services should you no longer wish to benefit from them.

## If you fail to provide your personal data

Where we are required by law to collect your personal data, or we need to collect your personal data under the terms of a contract we have with you, and you fail to provide that personal data when we request it, we may not be able to perform the contract we have or are trying to enter into with you. This may apply where you do not provide the personal data we need in order to make the App available to you or to process an application to register an account. In these circumstances, we may have to cancel your application or the provision of the App to you, in which case we will notify you.

## Third-party links

This Privacy Policy only applies to personal data processed by us through your use of the App and/or in connection with our business operations. However, from time to time, the App may contain links to third-party websites and services. We have no control over these websites and services and this Privacy Policy does not apply to your interaction with the relevant third parties.

When you use a link to go from our Site to another website (even if you don't leave our Site) or you request a service from a third party, your browsing and interactions on any other websites, or your dealings with any other third-party service provider, is subject to that website's or third-party service provider's own rules and policies. When you click on the links we may provide to such third-party platforms, you will be transferred from our Site to the relevant third-party platform and the privacy notice (and other terms and conditions) of that platform will apply to you.

We do not monitor, control or endorse the privacy practices of any third parties. We encourage you to become familiar with the privacy practices of every website you visit or third-party service provider that you use in connection with your interaction with us and to contact them if you have any questions about their respective privacy notices and practices.

## Third party app stores

If you wish to download and install the App from an app store (such as Google Play or the Apple AppStore), you must first register with the provider of the respective app store), for a user account and agree to that app store's user agreement. We have no influence on the terms of such user agreement and are not a party to such user agreement. When downloading and installing the App, certain information is transmitted to the respective provider of the app store (e.g. Google or Apple) including your username, your email address and the customer number of your account, the time of download and the individual device code and, in the case of in-app purchases, your payment information. We have no influence on this process and are not responsible for you downloading and installing the App on your mobile device.

## Sharing your personal data

We only share personal data with others when we are legally permitted to do so. When we share personal data with others, we put contractual arrangements and security mechanisms in place to protect the personal data shared and to comply with our data protection, confidentiality and security standards and obligations.

When processing your personal data, we may need to share it with third parties (including other entities within our group of companies), as set out in the table below. This list is non-exhaustive and there may be circumstances where we need to share personal data with other third parties.

We remain responsible for all the personal information we receive under the DPF and that we subsequently transfer to third parties acting as agents on our behalf if they process personal information in a manner inconsistent with the DPF principles, unless we prove we are not responsible for the event giving rise to the damage.

Third-party suppliers who	We share personal data with third parties who support us in providing the			
provide applications/	App and help provide, run and manage our internal IT systems. Such third			
functionality, data	parties may also include, for example, providers of information			
processing or IT services	technology, cloud-based software-as-a-service providers, identity			
	management, website design, hosting and management, data analysis,			
	data back-up, security and storage services. The servers powering and			
	facilitating that cloud infrastructure are located in secure data centres			
	around the world, and personal data may be stored in any one of them.			
	We also share your personal data with third-party service providers			
	assist us with insight analytics. These providers are described in our			
	cookie consent tool.			
Title of ODM				
Third-party CRM	We share personal data with specialist suppliers who assist us in			
specialists	managing our account-related communications (including customer			
	surveys and feedback requests).			
Event partners and	When we run events, we will share your personal data with third-party			
suppliers	service providers that are assisting us with the operation and			
	administration of that event. If we are running an event in partnership with			
	other organisations, we will share your personal data with such			
	organisations for use in relation to the event.			
Auditoro louvero	We share personal data with professional convices firms who advise and			
Auditors, lawyers,	We share personal data with professional services firms who advise and			
accountants and other	assist us in relation to the lawful and effective management of our			
professional advisers	organisation and in relation to any disputes we may become involved in.			
Law enforcement or other	We share personal data with law enforcement or other government and			
government and	regulatory agencies or other third parties as required by, and in			
regulatory agencies and	accordance with, applicable law or regulation.			
bodies				
Potential buyers of our	We may transfer your personal data to any third party that purchases, or			
organisation or in relation	to which we transfer, all or substantially all of our assets and business.			
to a merger	Should such a sale or transfer occur, we will use reasonable efforts to try			
	to ensure that the entity to which we transfer your personal information			
	uses it in a manner that is consistent with this Privacy Policy			

Other third parties	Occasionally, we may receive requests from third parties with authority to		
	obtain disclosure of personal data, such as to check that we are complying		
	with applicable law and regulation, to investigate an alleged crime, or to		
	establish, exercise or defend legal rights. We will only fulfil requests for		
	personal data where we are permitted to do so in accordance with		
	applicable law or regulation.		

#### International transfers

We have implemented standard contractual clauses to ensure adequate safeguards are in place to protect your information where it is transferred to our affiliated companies and boutiques in territories outside the United Kingdom, European Economic Area and Switzerland. Where we share your information with a third party service provider outside of the United Kingdom, European Economic Area and Switzerland (as detailed in the section entitled "Sharing your information"), we contractually oblige the third party service provider to implement adequate safeguards to protect your information.

## **Protecting your information**

We want you to feel confident about using the App, and we are committed to protecting the personal information we collect. We limit access to personal information about you to employees who reasonably need access to it, to provide products or services to you or in order to do their jobs. We have appropriate technical and organisational physical, electronic, and procedural safeguards to protect the personal information that you provide to us against unauthorised or unlawful processing and against accidental loss, damage or destruction. However, where we ask you to choose a password in order to access certain parts of the App, you are responsible for selecting a secure password and keeping that password confidential. You should choose a password which you do not use on any other site, and you should not share it with anyone else.

## Retaining your information

We keep your information for only as long as is necessary for our purposes, and in particular to protect ourselves in the event of a legal claim (for example, information relating to a contract with you will be kept for the lifetime of the contract and up to ten years after). After this period it will be deleted or in some cases anonymised. Where we sought your consent to process your personal information and we have no other lawful basis to continue with that processing, if you subsequently withdraw your consent we will delete your personal information.

## Confidentiality and security of your personal data

We are committed to keeping the personal data you provide to us secure and we have implemented information security policies, rules and technical measures to protect the personal data under our control from unauthorised access, improper use or disclosure, unauthorised modification and unlawful destruction or accidental loss. In addition, all our employees and data processors (i.e. those who process your personal data on our behalf) are obliged to respect the confidentiality of the personal data of all users of the App.

## Your choices

You have the right to ask for access to any personal information that we hold about you in our records, to correct any inaccuracies and to update any out-of-date information. In some circumstances, you have the right to request the erasure of your personal information or a restriction of its use.

You have the right to object to us processing your personal information in some cases. If you wish to exercise any of these rights, please write to us at the address listed below.

If you have a concern about how we use your information, as a first step please contact us using the details set out below and we will do our best to resolve your concern. After investigating your concern, we will respond to you in writing within a reasonable time setting out our proposed remedial action. If you think we have processed your personal information in a manner which is unlawful or breaches your rights you also have the right to complain to a European Data Protection Authority in your place of residence or work, or the jurisdiction in which the processing took place.

## **Your California Privacy Rights**

Under California Civil Code Section 1798.83, if you are a California resident and your business relationship with us is primarily for personal, family or household purposes, you may request certain data regarding our disclosure, if any, of personal information to third parties for the third parties' direct marketing purposes. To make such a request, please send an e-mail message to our e-mail address below with "Request for California Privacy Information" in the subject line. You may make such a request up to once per calendar year. If applicable, we will provide you, by e-mail, a list of the categories of personal information disclosed to third parties for their direct marketing purposes during the immediately preceding calendar year, along with the third parties' names and addresses. Please note that not all personal information sharing is covered by Section 1798.83's requirements.][Note: Only for US-facing sites COOKIE & NON-COOKIE:]

## Children

The App is not directed at anyone who we know to be under the age of 13, nor do we collect any personal information from anyone who we know to be under the age of 13. If you are under the age of 13, you should not use the App and should not submit any personal information to us.

### Contact us

If you have any questions or comments about this Privacy Policy, or privacy matters generally, please contact us at the address provided below. You can also use this address if you wish to request access to the personal information we hold about you.

If you have any questions about this Privacy Policy or the manner in which your information may be processed, please contact us at:

Salman Saif

**Head of Operations** 

salman@alfredus.co

# **Details of our Data Processing**

The following information provides details on a non-exclusive basis on the types of data we process for each activity and their respective purpose and lawful basis.

We process your personal data to:

# - l'o píovide the App

Activity	What Data	Why?	Lawful Basis
Set up and manage Profiles	Identity Data Contact Data Technical and Usage Data	To set up, verify and manage Profiles and keep them in working order.  To maintain our user databases, manage Private Group access.  To keep a record of how our services are being used.	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).  Necessary to comply with a legal obligation.
Personalisation of the App	Identity Data Contact Data Profile Data	To provide you with recommendations including on Content, pledges and experiences based on your profile (including your cultural selections).	Performance of contract
App browsing	Behavioural Data Technical and Usage Data	To help us understand how you are using and navigating the App. We do this so that we can better understand which parts of the App are more or less popular and to improve the structure and navigation of the App.	Necessary for our legitimate interest to enable us to provide the App in secure and effective way and make improvements to the App.
Provision of Content on the App, comments and other mentions	Identity Data Content Data Profile Data	When we or another user uploads Content to the App (including via comments, if you are	Necessary for our legitimate interest to enable us to provide relevant Content on the

Activity	What Data	Why?	Lawful Basis
		mentioned or if you are a public figure) we will process any personaldata associated with this.  We ask in our Terms of Use that any Content you provide to us does not contain any 'special category' for example, data relating to your sexual orientation, religious beliefs, political opinions or your health related data.	App and allow users to express opinions.  While we ask you to not upload Content which contains 'special category' data, if you do and we inadvertently process such data, we will take the fact you have provided to us such data as your express consent for us to process that data in connection with the provision of the App.
App support, maintenance and security	Identity Data Contact Data Technical and Usage Data	To administer and protect our business and the App (including troubleshooting, dealing with in app error messages data analysis, testing, system maintenance, support, reporting and hosting of data).  To respond to user inquiries/offer support to users. We may use your information to respond to your inquiries and solve any potential issues you might have with the use of the App.  We may use your information to request feedback and to contact you about your use of the App.  We may use your information as part of our efforts to keep the App	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).  Necessary to comply with a legal obligation.

Activity	What Data	Why?	Lawful Basis
		safe and secure (for example, for fraud monitoring and prevention).	
Enabling in-App features and notifications	Identity Data Contact Data Technical and Usage Data	To ensure that the App can operate properly and provide you with the features you want.  Allow you to receive reminders, alerts, updates and other information via push notifications.  You can configure and turn off push notifications via your device settings at any time.  We may use your information to provide you with the requested service, including but not limited to enabling user-to-user communications with each user's consent.  We may request access or permission to certain features from your mobile device, including your mobile device, including your mobile device's camera, microphone, calendar and other features. If you wish to change our access or permissions, you may do so in your device's settings—however this may reduce the functionality of the App.	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).  Necessary to comply with a legal obligation.

# - Event Management

Activity	What Data	Why?	Lawful Basis
Event management/ promotion	Identity Data Contact Data Special category data: including dietary or access requirements	To register you as an attendee at one of the events on <b>the</b> App. If you are a speaker at an event, we will publish your name in association with the event.	Performance of a contract with you.
Event health and safety	Identity Data  Contact Data  Incident data: including information about an incident you were involved in at an event including any personal data you provide in your (i) factual description of the incident/actions taken where you are the injured party or (ii) observations where you are a witness; severity of your injury (first aid only, onsite paramedic/paramedic technician, advised to visit hospital, hospitalised, fatality); if first aid is provided, the type of medical assistance provided, the medical report number and details of treatment; and any other personal data collected during the process of completing the incident report  Special category data: including dietary or access requirements	To report or log a health and safety incident you may have suffered or assisted with.	Necessary for our legitimate interests (to manage an incident, for analysis purposes and to help us improve our event/incident management processes).  Explicit consent (in respect of any special category data).

# - I'o manage ouí íelationship with you

Activity	What Data	Why?	Lawful Basis
Manage our relationship with Users	Identity Data Contact Data Profile Data Communications Data	To manage our relationship with you, for example in order to: a) notify you about changes to our terms or privacy notice; b) notify you about changes to event dates, locations or related services; and c) communicate with Users and potential Users on administrative matters.	Performance of a contract with you.  Necessary to comply with a legal obligation.  Necessary for our legitimate interests (to keep our records updated and to study how Users interact with the App).
Manage potential memberships	Identity Data  Contact Data	To verify membership referrals and manage potential membership lists.	Necessary for our legitimate interest to enable us to provide the App in secure and effective way.
To determine whether to send you an invitation to the App	Identity Data  Contact Data	To determine whether to send you an invitation to the App and to manage the invitation process.	Necessary for our legitimate interests in order to develop the App and grow our business.

# - To deal with useí enquiíies, caííy out suíveys and obtain feedback

Activity		What Data	Why?	Lawful Basis
Handling enquiries	user	Identity Data Contact Data Profile Data	To manage and respond to your enquiry.	Necessary for our legitimate interest so that we can help you with your enquiry, provide a good standard of service and improve our user services.
Survey feedback	and	Identity Data Contact Data Communications Data Profile Data	To help us to monitor and improve the App.  To assist with the selection of future App features and to train our personnel.	Necessary for our legitimate interest: a) so that we can improve the App and provide it in an effective way; and b) to study how users engage with the App, to develop them and grow our business.

# To caffy out insight and analysis

Activity	What Data	Why?	Lawful Basis
Insight & analysis through cookies and other similar tracking technologies	Behavioural Data Technical and Usage Data Profile Data	To analyse how you use or interact with, and the effectiveness of, the App and other communications which helps us to improve the App and the effectiveness of our communications, as well as to remember your preferences.  In some of our email messages, we use a "click-through URL" linked to certain websites administered by us or on our behalf. We may track click-through data to assist in determining interest in particular topics and measure the effectiveness of these communications.	Where your data is collected through the use of non- essential cookies, we rely on consent to collect your personal data and for the onward processing purpose.  Please see our Cookies and other information that we automatically collect section for further details.

Activity	What Data	Why?	Lawful Basis
Business administration and legal compliance	All data mentioned in "What data do we collect" section	To comply with our legal obligations.  To enforce our legal rights or defend potential legal claims.  To protect the rights of third parties.  To facilitate a business transition such as a merger, reorganisation, acquisition by another company, or sale of any of our assets.	Necessary for our legitimate interests (in order to operate our business in an effective manner).  Necessary to comply with a legal obligation.