

MANIGO SERVICES LTD

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# Privacy Policy

London, UK

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# Privacy Policy

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# Manigo Privacy Policy

## Introduction

MANIGO SERVICES LTD values its user's privacy. We would like to inform you about the management of your personal data in accordance with Art. 13, 14 General Data Protection Regulation (GDPR). Manigo Services Ltd is the Data Controller for the safety of your personal information. We are registered as a Data Controller with the Information Commissioner's Office (ICO), registration number ZA214276.

The revised privacy policy is effective 19 November 2018 and it summarizes what information we might collect from a registered user or other visitor ("you"), what is the legal basis for collecting and what we will and will not do with it.

Please note that this privacy policy does not govern the collection and use of information by companies that MANIGO SERVICES LTD does not control, nor by individuals not employed or managed by MANIGO SERVICES LTD. If you visit a Web site that we mention or link to, be sure to review its privacy policy before providing the site with information.

## What we do with your personally identifiable information

It is always up to you whether to disclose personally identifiable information to us, although if you elect not to do so, we reserve the right not to register you as a user or provide you with any products or services.

*"Personally identifiable information"* means information that can be used to identify you as an individual, such as, for example:

- your name, email address, phone number, address

If you do provide personally identifiable information to us, either directly or through a service provider or other business partner, we will:

- not sell or rent it to a third party without your permission — although unless you opt out (see below), we may use your contact information to provide you with information we believe you need to know or may find useful, such as (for example) news about our services and products and modifications to the Terms of Service;
- take commercially reasonable precautions to protect the information from loss, misuse and unauthorized access, disclosure, alteration and destruction;
- not use or disclose the information except:
  - as necessary to provide services or products you have ordered, such as (for example) by providing it to a carrier to deliver your ManigoCard;
  - in other ways described in this privacy policy or to which you have otherwise consented;

- o in the aggregate with other information in such a way so that your identity cannot reasonably be determined (for example, statistical compilations);
- o as required by law, for example, in response to a subpoena or search warrant;
- o to outside auditors who have agreed to keep the information confidential;
- o as necessary to enforce the Terms of Service;
- o as necessary to protect the rights, safety, or property of MANIGO SERVICES LTD, its users, or others; this may include (for example) exchanging information with other organizations for fraud protection and/or risk reduction.

### **Other information we collect**

We may collect other information that cannot be readily used to identify you. We may use this information, individually or in the aggregate, for technical administration of our services; research and development; customer- and account administration; and to help us focus our marketing efforts more precisely.

### **Cookies**

MANIGO SERVICES LTD uses “cookies” to store personal data on your computer. We may also link information stored on your computer in cookies with personal data about specific individuals stored on our servers. If you set up your Web browser (for example, Internet Explorer or Firefox) so that cookies are not allowed, you might not be able to use some or all of the features of our Website(s).

For more information, please see our Cookies Policy

### **Where we store your personal data**

Information you provide when you apply or sign up for the App, go through our identity or account verification process, authenticate into your account, communicate with us, answer our questions, or otherwise use the App or the website [www.manigo.com](http://www.manigo.com) is stored on secured servers provided by third party hosting vendors.

The data that we collect from you may be transferred to and stored at, a destination outside the European Economic Area (“EEA”). It may also be processed by staff operating outside the EEA who work for us or one of our suppliers. Prior to transmission of your information outside the EEA, we will ensure that adequate measures are in place to ensure the security of your data which are equal to EEA standards in accordance with this policy.

### **Your privacy responsibilities**

To help protect your privacy, be sure:

- not to share your user ID or password with anyone else;

- to take customary precautions to guard against “malware” (viruses, Trojan horses, bots, etc.), for example by installing and updating suitable anti-virus software.

### Your data protection rights

- You have the right to obtain confirmation whether or not personal data concerning you is being processed, and, where that is the case, access to the personal data and the information specified in Art. 15 GDPR. You also have the right to obtain an erasure of the personal data concerning you, if one of the reasons listed in Art. 17 GDPR applies. In certain situations, listed in Art. 20 GDPR, you have the right to data portability. **If the data is processed pursuant to Art. 6 para. 1 s. 1 lit. f GDPR (data processing for the purposes of the legitimate interests), you have the right to object to the processing at any time for reasons arising out of your particular situation.** We will then no longer process personal data, unless there are demonstrably compelling legitimate grounds for processing, which override the interests, rights and freedoms of the person concerned, or the processing serves the purpose of asserting, exercising or defending legal claims. You have the right to lodge a complaint with a supervisory authority. Please contact our data protection officer if you have any further questions, suggestions or wishes regarding data protection for example by e-mail: [compliance@manigo.com](mailto:compliance@manigo.com)

### Information collected from minors

You must be at least 18 years old to use MANIGO’s Web site and services. MANIGO SERVICES LTD does not knowingly collect information from minors under 18.

### Other information we may use

MANIGO SERVICES LTD offers the ability to make in-app peer-to-peer payments and in-app chat messaging to other Manigo members. To use both these functions we will require access to your phone contacts database. Before we access your phone contact database your permission will be requested. MANIGO SERVICES LTD does not store your phone contact database on our servers.

### Changes to this privacy policy

We reserve the right to change this privacy policy as we deem necessary or appropriate because of legal compliance requirements or changes in our business practices. If you have provided us with an email address, we will endeavor to notify you, by email to that address, of any material change to how we will use personally identifiable information.

### Questions or comments?

If you have questions or comments about MANIGO SERVICES LTD privacy policy, send an email to [compliance@manigo.com](mailto:compliance@manigo.com), or contact us via any of the ways described in the Contact Us page at [www.manigo.com](http://www.manigo.com).