
PRIVACY POLICY

05 SEPTEMBER 2017

Introduction

These Terms and Conditions, together with any and all other documents referred to herein, set out the terms of use under which you may use this website, <https://www.voucherpro.co.uk/> (“Our Site”). Please read these Terms and Conditions carefully and ensure that you understand them. Your agreement to comply with and be bound by these Terms and Conditions is deemed to occur upon your first use of Our Site. If you do not agree to comply with and be bound by these Terms and Conditions, you must stop using Our Site immediately.

This document is supplemental to the General Terms and Conditions for Website Use.

vServices Ltd, trading as <https://www.voucherpro.co.uk/> (“we”, “our”, “us”), are committed to protecting and respecting your privacy. This Policy sets out the obligations of vServices Limited (“the Company”) with regards to data protection and the rights of customers, business contacts etc (“data subjects”) in respect of their personal data under the Data Protection Act 1998 (“the Act”). Under the Act, “personal data” is defined as data which relates to a living individual who can be identified from that data or from that data and other information which is in the possession of, or is likely to come into the possession of, the data controller (the Company in this context), and includes any expression of opinion about the individual, and any indication of the intentions of the data controller or any other person in respect of the individual.

This Policy sets out the procedures that are to be followed when dealing with personal data. The procedures set out herein must be followed at all times by the Company, its employees, agents, contractors, or other parties working on behalf of the Company.

The Company is committed not only to the letter of the law but also to the spirit of the law, and places a high premium on the correct, lawful, and fair handling of all personal data, respecting the legal rights, privacy, and trust of all individuals with whom it deals.

The Company is registered with the Information Commissioner as a data controller under the register held by the Information Commissioner pursuant to Section 19 of the Act.

This policy (together with our website terms and conditions that apply to your use of our website and our mobile application terms and conditions that apply to your use of our mobile application) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

Information We May Collect from You

We may collect and process the following data about you:

- Information that you provide by filling in forms on our site [www.https://www.voucherpro.co.uk/](https://www.voucherpro.co.uk/) (the “Website”) or the registration process for our mobile application (the “App”). This includes information provided at the time of registering for our newsletter, posting discounts and other material or contacting us. We may also ask you for information when you report a problem with the Website or the App.
- If you contact us, we may keep a record of that correspondence.
- If you enter one of our competitions, we will keep a copy of the data you submit to us.
- We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
- Details of your visits to our Website or your use of the App, including, but not limited to, traffic data, location data and other communication data, the resources that you access and the transactions you make.
- Information in relation to your location, if (i) you have installed the App on a mobile device and permitted your mobile device to transmit location data in respect of this App, or (ii) you access our Website via a mobile browser and you allow the transmission of your location data when prompted by

your browser. Our App may be designed to collect information even if you are not logged in. The type of location data collected includes information relating to the latitude and longitude of your mobile device, your direction of travel and / or the time the location information was recorded.

IP Addresses and Cookies

We may collect information about your computer or mobile device, including your device identifier, IP address, operating system, and browser type, for system administration, to report aggregated information to our business users and for marketing purposes. This is statistical data about our users' browsing actions and patterns. For the same reason, we may obtain information about your usage of the Website by using a cookie file which is stored on the hard drive of your computer or the internal memory of your mobile device. Cookies contain information that is transferred to your computer's hard drive or your mobile device's internal memory. They help us to improve our Website and to deliver a better and more personalised service. They enable us:

- To estimate our audience size and usage pattern.
- To store information about your preferences, and so allow us to customise our Website according to your individual interests.
- To speed up your searches.
- To recognise you when you return to our Website.

You may refuse to accept cookies by activating the setting on your browser or your mobile device which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser or mobile device setting so that it will refuse cookies, our system will issue cookies when you log on to our Website.

For more information, please read our Data Protection and Cookies Policies available on this website.

Direct Mailings

If you register with the Website or use our App on your mobile device, or sign up for any of our newsletters or alerts, we will send you information about our voucher codes, printable vouchers, deals, sales, and/or other products and services we feel may interest you. Your e-mail address may also be used to send you information about our other websites that we feel are relevant to your registration on the Website.

You can sign up to our newsletter through submitting your email address at any of the sign-up boxes featured throughout the Website or via our User Registration page. By providing your email address you agree to receive regular newsletter emails from the Website.

You can unsubscribe from receiving our newsletter by clicking the "Unsubscribe" link featured within each of our newsletters. Alternatively, recipients can edit their personal information or manage newsletter subscriptions by updating their information within their user profile.

Where We Store Your Personal Data

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). Specifically our parent company ("vServices Ltd."), which is located in the United Kingdom with server in the United States of America and your personal data (as described in "Information we may Collect from You" above) can be accessed by and/or transferred to vServices Ltd servers in the United States, and/or its affiliates, partners, and service providers and will be used for the communication of information, request fulfilment, statistical analysis, optimisation of websites, marketing, to capture events, and generate reports such as: outlook impressions, app launches, geo-fence crossings, user comments, voting, IP address, device identifiers, and geo-locations, to prepare personalization algorithms and features, to check and verify the personal data for qualities such as completeness, validity, efficacy, and to provide administrative and support services.

To ensure the adequate protection of your personal data, any transfer of your personal data outside the EEA will be pursuant to the clauses approved by the European Commission.

By submitting your personal data and thus agreeing to this privacy policy, you agree to this transfer, storing or processing. Your express consent shall be required if the collection and transfer is of sensitive data. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy. Please note that third parties may independently collect data about you, including your IP address, information about the websites you visit and the links you click, through cookies, clicks on links, or other means when you visit or view ads on the Website or the App.

All information you provide to us is stored on our (or our third-party service providers') secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Website or our App, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Website or our App; any transmission is at your own risk.

Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Uses Made of the Information

We use information held about you in the following ways:

- To ensure that content from our Website or our App is presented in the most effective manner for you, your computer, and your mobile device.
- To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.
- To carry out our obligations arising from any contracts entered into between you and us.
- To allow you to participate in competitions and interactive features of our service(s), when you choose to do so.
- To provide you with marketing service(s).
- To notify you about changes to our service(s).
- To provide location based services to you (as set out below) if (i) you have installed the App on a mobile device and permitted your mobile device to transmit location data in respect of the App, or (ii) you access our Website via a mobile browser and you allow the transmission of your location data when prompted by your browser.

We may also use your data to provide you with information about goods and services which may be of interest to you.

We have implemented Google Analytics including Google Analytics Demographics and Interest Reporting. We use information from Google Analytics to gain understanding and insights about the nature of our audience and how they interact with our products and services (holistically not individually).

We have implemented Mobile App Tracking (MAT) to provide you with marketing services when using the App.

We only disclose information about identifiable individuals to our affiliate advertisers as described in "Disclosure of Your Information" below. However, we may provide any affiliate advertisers with aggregate information about our users.

Collection and Use of Location Data

If (i) you have installed the App on a mobile device and permitted your mobile device to transmit location data in respect of the App, or (ii) you access our Website via a mobile browser and you allow the transmission of your location data when prompted by your browser, we may use that location data held about you in the following ways:

- To log when you have arrived at and/or leave a location (for example, a shopping centre, a high street or an airport);
- To provide location based services to you (for example, offering vouchers for merchants nearby or other marketing relevant to your location);
- To infer the location of the places you visit most often and determine your frequency at these locations.

Location data will be processed for no longer than fourteen months.

By (i) installing the App on a mobile device and permitting your mobile device to transmit location data in respect of this App, or (ii) accessing our Website via a mobile browser and you allow the transmission of your location data when prompted by your browser, you consent to the collection and use of such location data as set out above.

You may adjust the settings on your mobile device to withdraw consent to sharing your location data at any time and to prevent the sharing of location data. You may also manage how your mobile device or mobile browser handles cookies and related technologies by adjusting your mobile device privacy and security settings. Please refer to instructions provided by your mobile service provider or the manufacturer of your device to learn how to adjust your mobile device and mobile browser settings. Please note that if you disable the sharing of location data, you may be unable to access some features of our services that are designed for mobile devices.

Disclosure of Your Information

We may disclose your personal information to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the Companies Act 2006. We may disclose your personal information to our affiliate advertisers, but only to the extent you have redeemed a voucher offered by the affiliate advertiser, or participated in an offer, contest or other activity sponsored or offered through the Website or App on behalf of the affiliate advertiser.

We may disclose your personal information to our service providers that provide services for us to assist us in carrying out our marketing such as sending emails on our behalf, processing payments, and facilitating card-linked offers. Our service providers are bound by law or contract to protect personal information and are only allowed to use the personal information in accordance with the terms of our service agreements with them.

We may disclose your personal information to other third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If <https://www.voucherpro.co.uk/> or substantially all of its assets are acquired by a third party, in which case personal data held by it, about its customers, will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Website terms and conditions, mobile application terms and conditions and other agreements; or to protect the rights, property, or safety of <https://www.voucherpro.co.uk/>, our customers, or others.

We may share information submitted as part of third party promotional activities only when you agree the specific Terms and Conditions of the promotion by opting in to the promotion.

Your Rights

You have the right to ask us not to process your personal data for marketing purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms which we use to collect your data. You can also exercise the right at any time by contacting us.

The Website or our App may, from time to time, contain links to and from the websites of third parties. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Access to Information

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.

Changes to Our Data Protection and Privacy Policy

Any changes we may make to our data protection and privacy policy in the future will be posted on this page.

Contact

Questions, comments, and requests regarding this data protection and privacy policy are welcomed and should be addressed to:

Address:
vServices Ltd (VoucherPro.co.uk)
86 Tottenham Court Road
London
W1T 4TQ
info@voucherpro.co.uk