



## Privacy Statement

17 June 2019

**This document comprises the Privacy Statement ("Statement") of Linking Mobile Limited ("Linking Mobile", "we", "us" or "our").**

In the course of providing our services ("**our Services**") advertisers, publishers, media agencies and other users of our Services and their staff ("**Users**") provide us with private information which may include personal data. This Statement sets out our policy for how we deal with private information and, in particular, personal data. The Statement also elaborates on the choices that Users (and where relevant their staff) can make about any personal data we collect.

**"Personal data"** is any information that can be used to identify a specific individual or that we can link to that individual.

It is our objective to make the information in this Statement easy to understand. To this end we have highlighted different occasions when we could potentially collect personal data, when we do this and how this information may be used. These instances are broken down into the following sections:

- The Legal Bases on which we Rely to Process Personal Data;
- The Types of Personal Data we Collect, either Directly or Indirectly,;
- How and When we collect Personal Data, ;How we may use Personal Data
- With whom we may share Personal Data;
- The steps we take to ensure Personal Data is Protected; and
- Rights in Relation to Personal Data .

The prime purpose of collecting personal data is to improve the way in which we provide our Services and to ensure we can always provide Users with support.

Notwithstanding any other provision in this Statement we shall comply at all times with the provisions of the General Data Protection Regulation -

(EU) 2016/679 (“**GDPR**”) or any other applicable data protection legislation.

## 1. Introduction:

- (i) At Linking Mobile, as a fundamental guiding principle, we respect the privacy of all private information provided to us by our Users and take the privacy rights of our Users very seriously.

This Statement is specific to private information and personal data provided by our Users or their individual staff members and is distinct from the way we protect the privacy of casual visitors to our website (“**Website**”) who may not be users of our Service.

- (ii) The data we collect and use is limited to the purpose for which Users expressly elect to use our Services and for the limited other purposes specified in this Statement.
- (iii) Our objective in collection of data is focused on servicing our Users’ requirements and in providing them with the benefits associated with the Services we provide.
- (iv) This Statement is incorporated into and comprises part of the Standard Terms and Conditions for use of our Services which can be accessed on our Website.

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## 2. The Legal Bases we Rely upon for Processing Personal Data

There are different lawful bases that we rely on to process personal data provided to us by Users. These are:

### **Performance of a contract**

The processing of personal data may be necessary to perform the agreement a User has with us including the provision of our Services to that User to register and maintain his or its account, to help with service issues or to respond to your requests.

### **Legitimate interests**

We may use personal data provided by a User for our legitimate interests. For example, we rely on our legitimate interest to analyse and improve our Services and the content available via our Website, to send you notifications to Users about software updates or information about our

Services or for administrative, fraud detection or other legitimate purposes.

## **Consent**

In certain rare instances we may request the consent of an individual to process personal data for a specific purpose. In those instances the personal data will only be processed for the purpose for which the consent has been granted and that consent may be withdrawn at any time.

Where we process an individual's personal data based on our legitimate interest and no opt-out mechanism is offered a User or the relevant member of that User's staff may exercise its or his right to object at any time by sending an email to us at [privacy@linkingmobile.com](mailto:privacy@linkingmobile.com)

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## **3. Data Collection:**

In providing our Services we collect and retain certain information about Users. This information can be categorised in one of two ways:

### **(i) Personally identifiable Information**

This means any information from which individuals may be **personally identified** including their name, address, email address, telephone number, profession, credit card details and any other information which may be disclosed to us through use of our Services.

### **(ii) Non-personally identifiable information**

This means information about individuals engaged by Users of our Services of **a non identifiable nature** collected by internet technologies we use to track delivery and improve the effectiveness of our Services.

We do not collect any personally identifiable information with the exception of that which is volunteered by individuals to assist in the delivery of our Services. For example we will request an email address in order to respond to support requests or to communicate with Users.

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## 4. How We Collect Data

### (i) Cookies

We use cookies to collect data that enables us to improve our Services:

A "cookie" is a small software file stored temporarily or placed on a computer's hard drive. The main purpose of a cookie is to allow a web server to identify the computer and the web browser of a person using a Website. It is then possible to tailor web pages and/or login information to the preferences of that person. Cookies help Linking Mobile display the information that our our Users need to use the capabilities of our Services and other information which we consider to be of interest to Users.

We use two types of cookies:

**Session cookies:** these store transient data, specifically a session-ID that the server will use to distinguish the User's browser from the browsers of other Users. Session cookies will disappear from a User's computer when he closes his web browser or turns off his computer.

**'Remember Me' cookies:** from time-to-time we use third parties providing analytic services to ask Users whether they would like to be remembered next time they visit our Website to use our Services. If the User agrees, a cookie will be written to that User's browser, simply containing his email address. 'Remember Me' cookies remain on a User's computer after the User closes his web browser or turn off his computer.

### (ii) Use of Cookies

By way of example cookies are used within our Services as follows:

- to identify an individual's computer when he visits our Website
- to save User preferences such as interface language
- to collect and analyse session information including duration of session, pages accessed, user location, page loading speed, search terms, page errors, returning and new Users, browser preference, operating system, downloads and referral sources.

We do not at any time use cookies to collect any personally identifiable information.

### (iii) Cookie Opt-out

Users of our Services can generally accept or decline the use of cookies through a functionality built into their web browser. Users can do this by readjusting their browser settings although it should be noted that by disabling cookies a User may not then be able to use all features of our Services.

For more information on cookies and how to disable them, you can consult the information provided at the following web address [www.allaboutcookies.org](http://www.allaboutcookies.org).

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## **5. When We Collect Personally Identifiable Information**

We collect personally identifiable from a User when that User

- (i) register to use our Services;
  - (ii) posts material on our Services;
  - (iii) makes a complaint or enquiry or provides other feedback to us; or
  - (iv) otherwise discloses personally identifiable information to us through our Services or otherwise at any time.
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## **6. How We Use Personally Identifiable Information**

We use personally identifiable information to:

- (i) help us provide our Services;
- (ii) process and complete requests to use our Services including the administration of payments which Users make via our Website;
- (iii) confirm and investigate any transactions or transfers of monies that may occur in respect of any use of our Services;
- (iv) process and deal with any complaints or enquiries made by Users;
- (v) monitor, develop, run, provide and improve our Services;
- (vi) ensure our Services are presented in the most effective manner for Users;
- (vii) notify Users about changes to our Services;
- (viii) monitor and investigate any suspected breach by a User (or otherwise relating to a User) of our Privacy Policy or of the terms on which we have agreed a User may use our Services;
- (ix) (in accordance with a User's preferences) send that User information by email about our Services;
- (x) (in accordance with a User's marketing preferences), pass personally identifiable information to third parties for marketing purposes if that User has authorised us to do so.

A User can change its mind and choose to receive or not to receive communications from us or any third party who it has consented may contact that User at any time by using the relevant unsubscribe link which we include in each email or by sending us an email – see “**How to Contact Us**” below.

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## **7. Will We Share Your Personally Identifiable Information With Third Parties?**

We will never sell or pass on personally identifiable information to third parties for marketing or any other purpose without your consent.

We only pass on personally identifiable information to third parties in the following instances::

- (i) we may pass personally identifiable information to our employees, agents, subcontractors and partner organisations to help operate our Services, take payments and provide relevant information to Users;
- (ii) personally identifiable information may be transferred to a successor company or other organisation in the event of a sale of our business or in the event we are placed into administration (but Users will be notified and offered the chance to unsubscribe should this occur);
- (iii) in some cases we may use a technical partner to conduct some processing of personally identifiable information on our behalf, but this will always be subject to strict contractual control and in compliance with relevant data protection legislation;
- (iv) if, and only if, a User has given consent for such purpose, we may pass personally identifiable information to third parties so that they can send you information about services and information which may be of interest to that User; and
- (v) in exceptional circumstances we may need to disclose personally identifiable information to the police, regulatory bodies or legal advisers in connection with any alleged criminal offence or suspected breach by a User (or otherwise relating to that User) of this Privacy Statement or the terms on which we have agreed you may use our Services or pursuant to a court order.

In addition, some general statistical information about our user base may be passed on to reputable third parties for research purposes but these details will never include personally identifiable information.

Users can change their mind about the passing of personally identifiable information to third parties at any time by updating their marketing preferences – see “Your Rights, Complaints and How to Contact Us” below.

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## 8. How We Protect Your Information

### (i) Security

We will take all reasonable steps to protect personally identifiable information provided to us. All the data collected by us is and will at all times be stored on a secure server. Your browser will encrypt all sensitive information (including payment details) which you input before it is sent to us. It is, however, an inescapable fact that the transmission of information via the internet is not completely secure. Although we will do our best to protect personally identifiable information we cannot guarantee the security of personally identifiable information transmitted to our Website and any transmission is at your own risk. Once we have received personally identifiable information, we will, however, use strict procedures and security features to try to minimise the likelihood of any unauthorised access.

### (ii) Storage

Personally identifiable information collected by Linking Mobile may be stored and processed in your region or in any other country where Linking Mobile or its affiliates, subsidiaries or service providers are located or maintain facilities. Linking Mobile has put in place adequate mechanisms to protect personally identifiable information when it is transferred internationally. In particular we will only transfer personally identifiable information to a country outside the European Economic Area (a “**third country**”) where that country has adequate data protection legislation.

### (iii) Retention

Linking Mobile will retain personally identifiable information only for as long as we deem it necessary to enable you to use our Website and as is necessary to continue the provision of our Services, to comply with applicable laws (including those regarding document retention), to resolve disputes with any parties and otherwise as necessary to allow us lawfully to conduct our business. All personally identifiable information that we retain will be subject to this Privacy Statement and to our internal retention guidelines. If you have a question about a specific retention period for certain types of personal information we process, please send an email to [privacy@linkingmobile.com](mailto:privacy@linkingmobile.com)

### (iv) Third Party Sites

Please be aware that our Services contains links to other websites which may be accessed by you. We are not responsible for the privacy policies,

content or security of those other websites should you utilise any of these links.

We do not store any credit card numbers entered into our Website or payment systems.

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## 9. Your Rights, Complaints and How To Contact Us

### (i) Your Rights

We want the Users of our Services and individuals engaged by them to be in control of how we use personally identifiable information. This can be achieved in the following ways:

- **a right of to be informed.** We will, if requested, confirm if we are processing an individual's personally identifiable information together with details of the personal data being processed.
- **a right to data portability.** We will, if requested, send any personally identifiable information to the individual who provided it in machine readable format.
- **a right of access.** We will, if requested, provide provide individuals with copies of their personal data that we hold so that they may check the lawfulness of the way in which it is being processed.
- **a right to object.** In the unlikely event we ever to use any personally identifiable information for direct marketing based on our legitimate interests or for research purposes, the individual to whom the personal data relates has a right to object to the use of his data for such purpose **at any time.**
- **a right of erasure.** An individual who has provided us with personally identifiable information has the right to request that the personal data in question is erased.
- **a right to restrict processing.** Should any individual make a complain about the manner in which his personally identifiable data is being processed we will if requested restrict the processing of that data until the complaint has been resolved.
- **a right for personal data not to be processed automatically.** In the event we were ever to process personally identifiable information automatically we would cease doing so if the individual to who that personal data related objected.

We rely on Users and their staff to ensure that all personally identifiable information they provide to us is complete, accurate and up to date.

Please do inform us promptly of any changes or inaccuracies by contacting [privacy@linkingmobile.com](mailto:privacy@linkingmobile.com)

If a User or its staff member wishes to access, edit or remove profile information, change a password, close an account or request deletion of personally identifiable information, this should be requested by sending an email to [privacy@linkingmobile.com](mailto:privacy@linkingmobile.com)

We will respond to any request to access or delete your data as soon as possible, and in any event, within 30 days.

(ii) **Complaints**

We are committed to working with our Users to obtain a fair resolution of any complaint or concern they may have about our use of personally identifiable information of any of their staff. If, however, any User believe that we have not been able to assist with a complaint or concern, it has the right to file a complaint with the data protection authority in the country in which it is located. The data protection authority in the United Kingdom is the Information Commissioner's Office.

(iii) **How to Contact Us**

If you have any comments or queries or complaints in connection with our Privacy Statement, or any individual who has provided us with personally identifiable information would like to access that data or needs to send us updated or corrected information including changing marketing preferences, please contact us by email at [privacy@LinkingMobile.com](mailto:privacy@LinkingMobile.com)

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## **INFORMATION ABOUT US**

We are Linking Mobile Limited, a company registered in England and Wales with company number 07441479. Our registered address is at 1<sup>st</sup> Floor, Puerorum House, 26 Great Queen Street, London WC2 5BL.

This Privacy Statement was last updated on **17 June 2019**