

Placer: Privacy Policy

We, **Placer Ltd**, are committed to protecting and respecting your privacy.

SCOPE OF POLICY

This policy (together with our end-user licence agreement as set out at <http://www.placer.co.uk/end-user-licence-agreement> (**EULA**) and any additional terms of use incorporated by reference into the EULA, together our website terms of use <http://www.placer.co.uk/terms-of-use> (**Terms of Use**) applies to your use of:

- The Placer mobile application software (**App**) once you have downloaded a copy of the App onto your mobile telephone or handheld device (**Device**) via an app store provider located at <https://play.google.com/store/apps> and <https://itunes.apple.com/gb/genre/ios/id36>
- Any of the services accessible through the App (**Services**) that are available via the App or other sites of ours (**Services Sites**), unless the EULA states that a separate privacy policy applies to a particular Service, in which case that privacy policy only applies.

This policy 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.

For the purposes of the Data Protection Act 1998 the data controller is **Placer Ltd** of **Studio 11 Tiger House, Burton Street, London, England, WC1H 9BY**.

INFORMATION WE COLLECT FROM YOU

1.1. We will collect and process the following data about you:

- **Information you give us (Submitted information):**

This is information you give us about you by filling in forms on the App and the Services Sites (together **Our Sites**), or by corresponding with us (for example, by e-mail or chat). It includes information you provide when you register to use the App, subscribe to any of our Services, search for the App or Service, make an in-App purchase, share data via the App's social media functions, enter a competition, promotion or survey and when you report a problem with the App or our Services. If you contact us, we will keep a record of that correspondence. The information you give us may include your name, address, e-mail address and phone number, the Device's phone number, age, username, password and other registration information, financial and credit card information, personal description and photograph.

- **Information we collect about you and your device:**

Each time you visit one of our Sites or use the App we will automatically collect the following

information:

- technical information, including the type of mobile device you use, a unique device identifier (for example, your Device's IMEI number, the MAC address of the Device's wireless network interface, or the mobile phone number used by the Device), mobile network information, your mobile operating system, the type of mobile browser you use and time zone setting (**Device Information**);
- details of your use of any of our Apps or your visits to any of Our Sites and the resources that you access (**Log Information**).
- We may also use GPS technology to determine your current location. Some of our location-enabled Services require your personal data for the feature to work. If you wish to use the particular feature, you will be asked to consent to your data being used for this purpose. You can enable or disable location services when you use our Service at any time through your mobile device settings (**Location Information**)
- Information we receive from other sources. We may receive information about you if you use any of the Services we provide. In this case we will have informed you when we collected that data that it may be shared internally and combined with data collected on Our Sites. We are also working closely with third parties (including, for example, business partners, subcontractors, delivery services, analytics providers, search information providers) and may receive information about you from them. (**Third Party Information**)

COOKIES

We use cookies to distinguish you from other users of the App, Appstore or Service Site. This helps us to provide you with a good experience when you use the App or browse any of the sites and also allows us to improve the App and Our Sites. For detailed information on the cookies we use and the purposes for which we use them, see our cookie policy <http://www.placer.co.uk/cookies>.

USES MADE OF THE INFORMATION

- to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and Services that you request from us;
- if you are an existing customer, We will only contact you by electronic means (e-mail or mobile push notification) with information about the Services we feel may be of benefit to you.
- to notify you about changes to our service;
- to ensure that content from Our Sites is presented in the most effective manner for you and for your computer or Device.

We use information held about you in the following ways:

- to administer Our Sites and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve Our Sites to ensure that content is presented in the most effective manner for you and for your Device/computer;

- to allow you to participate in any interactive features of our Service, when you choose to do so;
- as part of our efforts to keep Our Site(s) safe and secure;
- to make suggestions and recommendations to you and other users of Our Sites about services that may interest you or them;
- to provide you with targeted advertising that we feel may be of interest to you; and
- for research purposes carried out internally or by trusted third parties.

DISCLOSURE OF YOUR INFORMATION

We may share the information held about you with selected third parties including:

- Your learning providers (university or college for example) to provide them with updates and analysis regarding your use of the Services; and
- Analytics and search engine providers that assist us in the improvement and optimisation of Our Sites.

You agree that we have the right to 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 will disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
- If Placer Ltd 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 or regulatory obligation or request.
- In order to:
 - enforce or apply the EULA, Our Terms of Use and other agreements or to investigate potential breaches; or
 - protect the rights, property or safety of Placer Ltd our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

WHERE WE STORE YOUR PERSONAL DATA

All information you provide to us is stored on our secure servers held in the EEA European Economic Area (EEA) only. It will also be processed by staff operating within the EEA who work for us or for one of our suppliers. These staff may be engaged in the fulfilment of your request, order or reservation, the processing of your payment details and the provision of support services. By submitting your

personal data, you agree to this transfer, storing or processing.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of Our Sites, you are responsible for keeping this password confidential. We ask you not to share a 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 Sites; 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.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

YOUR RIGHTS

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at support@placer.co.uk.

Our Sites may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates (including, but not limited to, websites on which the App or the Services are advertised). If you follow a link to any of these websites, please note that these websites and any services that may be accessible through them have their own privacy policies and that we do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites or services, such as contact and location data. Please check these policies before you submit any personal data to these websites or use these services.

ACCESS TO INFORMATION

The Data Protection Act 1998 gives you the right to access information held about you. Your right of access can be exercised in accordance with that Act.

CHANGES TO PRIVACY POLICY

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. The new terms may be displayed on-screen and you may be required to read and accept them to continue your use of the App or the Services.

CONTACT

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

support@placer.co.uk.