

BOLDMIND
PRIVACY POLICY

Last updated: 15.08.2018

BOLDMIND LIMITED is dedicated to protecting and respecting your personal information and we have made it very clear in our Terms of Service. The purpose of this Privacy Policy is to provide a comprehensive overview and to explain how we collect and use any personal information and data that we may obtain from you or about you. We want to inform you how we look after your personal information and other information which you will share with us. But of course, if you still have questions about anything in our Privacy Policy, please just [contact us](#).

We may update our Privacy Policy from time to time. If we do so, we will publish the updated Privacy Policy on our website and may also communicate any changes to you by email. We do encourage you to visit our website regularly to stay informed of any changes.

For ease of use, you can click on the links below to skip to the relevant section of this Privacy Policy.

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1. WHO WE ARE

BOLDMIND LIMITED is the controller and is responsible for your personal information (collectively referred to as “**Boldmind**”, “**we**”, “**us**” or “**our**” in this Privacy Policy). We are a registered data controller with the UK Information Commissioner’s Office where you can find our details under the registration number **ZA452028**.

Our registered office and principal address is located at Kemp House, City Road, London EC1V 2NX however this Privacy Policy also applies to all of our satellite offices and information centres (if any).

We have appointed a data protection officer (**DPO**) who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy

Policy including any requests to exercise your legal rights please contact the DPO using the details below:

Dagmara Lacka
BOLDMIND LIMITED
99 Clifton Street
EC2A 4LG, London, UK

e-mail address: ads@flow.city
telephone number: (0044) 207 193 9668

2. INFORMATION WE COLLECT ABOUT YOU

Our primary goal in collecting personal information from you is to give you a customised experience while allowing us to provide services and features that most likely meet your needs. Personal information (or data) means any information about an individual from which that person can be identified. It does not include data where the identity has been removed which instead known as anonymous data.

We collect and process a variety of personal information which we have grouped together as follows:

- (1) Account information which includes (or may include) your current full name, your phone number, username, password, profile information, about information, last seen information and passwords;
- (2) Contact information which includes (or may include) your current postal address, any previous addresses, your e-mail address and any information you give us when you complete the Contact Us form on our website;
- (3) Financial information which includes your bank account details, credit and/or debit card details, VAT number, billing information, PayPal information etc;
- (4) Video and/or photographic images which includes copies of your identity documents, profile picture or any other photographs;
- (5) Your locations;
- (6) Advertising materials and artwork;
- (7) Marketing preferences;
- (8) Survey information when you respond to offers or complete surveys that we may ask you about and which we use for research purposes although you do not have to respond to them;
- (9) Service information which includes information about which services we provide you with;

- (10) Technical information and usage information which includes your IP address, geographical location, browser type and version, operating system, hardware model, battery level, signal strength, app version, mobile network, operator, language, time zone, device operations information, the Uniform Resource Locators (URL) details, length of visit, page views, website navigation, metadata associated with sending information through our website and interaction with our website and our posts on various social media and other platforms;
- (11) Any other personal information that you chose to disclose to us;

We obtain, collect and process a variety of categories of personal information at the start, throughout and after your contractual or other relationship with us. Whilst we may hold a variety of information about you, we do try to limit the collection and processing of information to what is necessary to achieve one or more of the legitimate purposes as is explained further in this Privacy Policy.

We may also process special certain categories of information for specific and limited purposes, such as prevention of fraud and crime or where this information is critical to the service that we provide you with. We will only process these special categories of information where we have your explicit consent, are lawfully permitted to do so or are obligated to do so by law.

We also collect and use what is known as aggregated data for any purpose. Aggregated data may be derived from your personal information however it does not reveal your personal information either directly or indirectly. For example, we may use aggregated data to calculate a percentage of our users using a particular service or website, log files, and diagnostic, crash, website, and performance logs and reports. This also includes information about when you registered to use our services, the features you use like our messaging, calling, status, or groups features, profile photo, about information, whether you are online, when you last used our services, and when you last updated your about information.

3. HOW IS YOUR PERSONAL INFORMATION COLLECTED

We obtain your personal information in a variety of ways including:

- (1) Information that you give us whether it is whilst contacting us, throughout our contractual relationship with you but also through your interaction with businesses through Boldmind and externally;
- (2) Information we receive from third-parties including other users, service providers, businesses and any of our partners (where permitted by law), affiliated companies or credit referencing or fraud prevention or government agencies;
- (3) Information we learn about you through our contractual relationship as we are carrying out the service in accordance with our contractual relationship;

- (4) Information that we gather from publicly available sources such as various public registers, online search engines and associated websites and any virtual or physical media;
- (5) Information that we gather from technology about how you access our services and your interactions with our various media posts such as via Google analytics and others.

4. HOW WE USE YOUR PERSONAL INFORMATION

We will only use and share your information where it is necessary for us to carry out, provide, improve, understand, customize, support and market our services and in connection with our lawful activities. So that you can fully understand how your personal information may be used we have detailed the purposes for which your information may be used below.

You have the right to withhold your personal information (subject to this not misleading us) or in some cases request that this information is not used as detailed below however unfortunately in most cases if you fail to provide or agree to us processing the personal information that we require we are unlikely to be able to provide you with our services. In addition we may still be obliged to disclose the information we hold in accordance with our legal obligations.

4.1 CONTRACTUAL NECESSITY IN ORDER TO PROVIDE YOU WITH OUR SERVICES

Where we have entered or about to enter into a contract with you (meaning when you have accepted our [Terms of Service](#)) it will be necessary of us to process your personal information in order to perform our obligations under [Terms of Service](#). This may include processing your personal information in the following ways:

- (1) Providing customer support, and improving, fixing, and customizing our services;
- (2) Record keeping and service administration;
- (3) Confirming your identity and verifying accounts;
- (4) Communicating with you about the matter or the services that you have received from us;
- (5) Managing and maintaining our relationship with you and providing ongoing service; and
- (6) Sharing your personal information to third-parties, business partners that provide services, app-integrated services and functionality, third-party branded services.

4.2 LEGAL OBLIGATIONS THAT ARE PLACED ON US BY VARIOUS AUTHORITIES

Were you have contacted us about our services or where you have entered into a contractual agreement with us, we are required by law to collect and process certain personal information about you. This may include processing your personal information in the following ways:

- (1) Investigating and resolving complaints;
- (2) Conducting investigations into potential breaches of conduct and policies by our employees, contractors, sub-contractors and other affiliated companies;
- (3) Managing contentious regulatory matters;
- (4) Notifying our insurers in cases of incidents or emergencies on our premises or in cases of regulatory or contractual breaches;
- (5) Notifying you of any changes to our policies or terms and conditions and complying with your requests where you have exercised your rights as detailed in this Privacy Policy;
- (6) Confirming your identity using the information and documents that you have provided;
- (7) Performing checks for the purposes of preventing and detecting crime and complying with anti-money laundering regulations as well as laws against fraud, terrorism financing, bribery and corruption and international sanctions;
- (8) Sharing information with law enforcement agencies and other authorities and regulators, including reporting suspicious activities, where we have a legal obligation to do so; and
- (9) Sharing information with third parties where we have been ordered to so by the court or it is required by any statutory or legal instrument.

4.3 LEGITIMATE INTERESTS OF BOLDMIND

We may also process your information where it is in our legitimate interest to do so as a company. We will do this without prejudicing your fundamental rights and freedoms. This may include processing your personal information in the following ways:

- (1) Ensuring that we are providing you with the service you require;
- (2) Understanding your needs, actions, preferences and expectations in order to improve our service and to develop new services;
- (3) Assessing the quality of service that we have provided and analysing any complaints that you have made in order to improve our service and to address any training needs of our own people;

- (4) Compensating you for loss as a result of any regulatory or service level failures;
- (5) Monitoring and processing your information in order to monitor and improve our business processes and information solutions to ensure business continuity and continuing information security;
- (6) Performing financial, regulatory and general accounting and reporting;
- (7) Performing risk reporting and risk management;
- (8) Protecting our rights and interests by carrying out debt tracing and recovery.

5. SHARING YOUR PERSONAL INFORMATION WITH THIRD PARTIES

We will not share your personal information with anyone outside Boldmind except:

- (1) Where we have your express permission to do so; or
- (2) Sharing your personal information is contractually necessary for us to provide you with our services; or
- (3) We are legally obliged to share your personal information; or
- (4) Sharing your personal information falls within the legitimate interests of Boldmind, such as for the purposes of debt tracing and debt recovery.

However, all of our rights and obligations under our Privacy Policy are freely assignable by us to any of our affiliates, in connection with a merger, acquisition, restructuring, or sale of assets, or by operation of law or otherwise, and we may transfer your information to any of our affiliates, successor entities, or new owner.

6. TRANSFERRING YOUR PERSONAL INFORMATION OVERSEAS

We will not usually transfer your information outside of the European Economic Area unless doing so is necessary in order to carry out our contract with you or unless you are based outside of the European Economic Area.

In the event that we must transfer your personal information outside of the European Economic Area we will only do so if one of the following conditions is met:

- (1) You have provided your express consent;
- (2) The relevant country has been deemed to provide an adequate level of protection for personal information by the European Commission;

- (3) Where we use a service provider, we have entered into a contract on the terms approved by the European Commission which gives personal information the same level of protection as it has in the European Economic Area;
- (4) Where we use a service provider based in the United States of America, they are part of the Privacy Shield which requires them to provide a similar level of protection to personal information protection as it has in the European Economic Area.

7. SECURITY OF YOUR PERSONAL INFORMATION

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to our employees. Any agents or third parties are provided with your personal information only on need to know basis.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. RETAINING YOUR PERSONAL INFORMATION

We will not retain your personal information for any longer that is necessary for the purpose that it was obtained until your account is deleted – whichever comes first.

In some circumstances we may retain your personal information for longer. We will do this where we are required to do so by law or we believe that the information may be relevant to any ongoing or prospective legal proceedings or legal matter or where we believe it is necessary to retain the information or the documents to protect, exercise or defend our or your rights.

In some circumstances you can ask us to delete your personal information. When you delete your account, we delete things that you have posted, such as your photos and status updates, and you won't be able to recover this information later from your account. Information that you have shared with other Boldmind users won't be deleted and will still appear in their accounts and stored chats with you, but under 'Boldmind user' description, not your own.

9. YOUR RIGHTS IN RESPECT OF YOUR PERSONAL INFORMATION

Under the General Data Protection Regulation or other applicable local laws, you have the right to access, rectify, port, and erase your information, as well as the right to restrict and object to certain processing of your information. As such, we want to ensure that you are fully informed about the rights that you have in relation to the personal information that we hold and process about you.

If you wish to exercise any of these rights, please contact the DPO using the contact details provided in this Privacy Policy. We will aim to respond to you as soon as possible however in all cases within the time limits imposed by the legislation.

9.1 RIGHT OF ACCESS

You have the right to access the information that we hold about you. Please contact the DPO if you would like a copy of your personal information.

We have a period of one calendar month to provide you with information however if we hold a large amount of data or the request is complex we may request a further two calendar months. In order to reduce processing time and ensure that we can get copies of the information to you as quickly as possible please be as specific as possible. If you require all of the information we hold, please say so.

You do not need to pay a fee to gain access to your personal information.

9.2 RIGHT OF PORTABILITY

You have the right to access the information that we hold about you in a portable format. What this means is that the personal information that we hold about you will be provided to you in a format that you can reasonably expect to be able to access, typically as .pdf file(s) or in paper format.

9.3 RIGHT OF RECTIFICATION

If you have noticed that any information that we hold about you is inaccurate, you have the right to require us to correct the information we hold. Please contact the DPO with the correct information.

9.4 RIGHT OF ERASURE

You have the right to request that we erase the personal information that we hold about you. You should do so if you believe that we are not using your information in a lawful manner or we no longer need to process your information for the purposes for which it was provided or you wish to withdraw your consent to us retaining and processing your personal information. To make this request, please contact the DPO.

Please note that we may not be able to erase your personal information if:

- (1) It has been less than six years from the conclusion of our contractual relationship;
- (2) We are currently involved in a dispute with you or there are any outstanding debts (whether disputed or not) from you to Boldmind;
- (3) Retention of your personal information falls under our legal obligations.

9.5 RIGHT OF RESTRICTION

You have the right to limit the way we use the information we hold about you. You can request that we stop using the personal information that we hold about you for a particular purpose or purposes. You should do so if you believe that we are not using your information in a lawful manner or we no longer need to process your information for the purposes for which it was provided or the information we hold is inaccurate or you have objected to us using your personal information. To make this request, please contact the DPO.

Please note that we may not be able to restrict all the purposes for which you request we stop the use of your personal information if:

- (1) We are currently involved in a dispute with you or there are any outstanding debts (whether disputed or not) from you to Boldmind;
- (2) Processing of your personal information in this manner falls under our legal obligations.

Please also note that restricting the way in which we use your personal information may mean that we will no longer be able to continue our contractual relationship with you.

9.6 RIGHT OF OBJECTION

You have the right to object to us processing your personal information. To make this request, please contact the DPO. Please note that we may not be able to comply with your request fully if:

- (1) We are currently involved in a dispute with you or there are any outstanding debts (whether disputed or not) from you to Boldmind;
- (2) We can demonstrate another compelling and legitimate ground for processing which should override your interests. The burden to show this is on us.

Please also note that objecting to the use your personal information may mean that we will no longer be able to continue our contractual relationship with you.

9.7 RIGHT OF OBJECTION TO DIRECT MARKETING / RIGHT TO OPT OUT

You have an absolute right to object to us processing your personal information for direct marketing purposes and to opt out of any marketing material or news letters being sent to you. To make this request please contact the DPO.

9.8 RIGHT TO WITHDRAW CONSENT

You have the right to withdraw your consent to processing your personal information where we rely on your consent to process your information for a specific purpose or in a particular manner. To make this request please contact the DPO.

9.9 RIGHT TO LODGE A COMPLAINT

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO) who are the UK supervisory authority for data protection issues. We do however encourage you to contact our DPO in the first instance to resolve any issues.

9.10 CHANGES OF PURPOSE OF PROCESSING YOUR PERSONAL INFORMATION

We will only use your personal information for the purposes for which it was collected unless we reasonably consider that that your personal information should be used for another purposes which is compatible with the original purpose.

In the event that we need to use your personal information for an unrelated purpose or in such a way that you could not have reasonably anticipate it would have been used, will notify before using your information in this manner and you will have the right to object to its use.

10. MARKETING INFORMATION

Unless you have told us that you do not want to hear from us in relation to services that we consider are of interest to you, we will send you relevant marketing information by mail, phone, email and other forms of electronic communication.

If no longer want us to contact you with marketing information, please contact our DPO with your request and we immediately stop processing your information in this manner.

11. COOKIES

A "cookie" is a bite-sized piece of data that is stored on your computer's hard drive. They are used by nearly all websites and do not harm your system. We use them to track your activity to help ensure you get the smoothest possible experience when visiting our website.

We can use the information from cookies to ensure we present you with options tailored to your preferences on your next visit. We can also use cookies to analyse traffic and for advertising purposes.

If you want to check or change what types of cookies you accept, this can usually be altered within your browser settings.

If you don't want to receive cookies that are not strictly necessary to perform basic features of our site, you may choose to opt-out by changing your browser settings.

Most web browsers will accept cookies but if you would rather we didn't collect data in this way you can choose to accept all or some, or reject cookies in your browser's privacy settings. However, rejecting all cookies means that you may not be able to take full advantage of all our website's features. Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences.

For more information generally on cookies, including how to disable them, please refer to aboutcookies.org. You will also find details on how to delete cookies from your computer.

