



**The spontaneous sharing
app for life and business.**

www.spontly.com



Privacy Policy

Spontly Limited ("we", "us") are committed to protecting and respecting your privacy.

We are the owner of the Spontly mobile application ("our App"), Spontly website (www.spontly.com) ("our Site") and Spontly Plug-in for external websites ("Plug-in").

This privacy policy (together with our App and Site [terms of use](http://www.spontly.com/terms_of_use) [<http://www.spontly.com/privacy>]) applies to your use of our App, our Site, or any Plug-in located on an external website.

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 purpose of the Data Protection Act 1998 (the "Act"), the data controller is Spontly Limited of 4 Nestfield Industrial Estate, Darlington, County Durham, DL1 2NW.

Information we may collect from you

We may collect and process the following data about you:

Submitted Information:

- Information that you provide by filling in forms on our App, our Site or any Plug-in. This includes information provided:
 - at the time of registering to use our App or Site;
 - when posting content through the App or Site;
 - when 'checking in' to live events through the App;
 - when requesting further services from us; and
 - when entering your details in a pop-up form on a Plug-in to receive discounts, vouchers or other offers.



- Content that you upload to our App or Site, including photographs, and communications that you exchange with other users of the App or Site in the form of comments.

Additional Information:

- We may also ask you for information if you contact us directly, or when you report a problem with our App or Site, and keep a record of that correspondence.
- 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 use of our App, Site or Plug-in including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own purposes or otherwise, and the resources that you access.

Device Information:

- We may collect information about the mobile device or any computer you may use to download or stream a copy of our App onto your mobile device, including, where available, the mobile device's or computer's unique device identifiers, operating system, browser type and mobile network information as well as the mobile device's telephone number, for system administration and to report aggregate information to our advertisers

Location information:

- When you use one of our location-enabled services, we may collect and process information about your actual location. Some of these 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 withdraw your consent at any time by contacting us at contact@spontly.com.

Log information:

- When you use our App, Site or a Plug-in we may automatically collect and store certain information in server logs, including but not limited to internet protocol (IP) addresses, internet service provider (ISP), clickstream data, browser type and language, viewed and exit pages and date or time stamps.



Cookies

Like most apps and websites, we use cookies and web log files to track usage and trends, to improve the quality of our service, to customize your experience, as well as to deliver advertising to users both on and off our App and Site. A cookie is a tiny data file that resides on your mobile phone, computer, or other device, and allows us to recognize you as a user when you return to our App or Site using the same device. You can remove or block cookies using the settings in your browser, but in some cases doing so may impact your ability to use our App or Site.

If you are a registered user with us, one type of cookie, known as a “persistent” cookie, will be set once you’ve logged in to your account. The next time you visit our App or Site, the persistent cookie will allow us to recognize you as an existing user so you will not need to log in again. Another type of cookie, called a “session” cookie, is used to identify a particular visit to our App or Site. Session cookies expire after a short time or when you close your App or Site. If you register with us or if you continue to use our App or Site, you agree to our use of cookies.

You block cookies by activating the setting on your browser which allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our App or Site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies as soon as you visit our App or Site.

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”). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on our secure servers operated and maintained by third parties. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our App or Site, 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 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 App, Site and Plug-in is presented in the most effective manner for you and for your computer or 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 interactive features of our service, when you choose to do so.
- To notify you about changes to our service.

We may also use your data, or permit selected third parties to use your data, to provide you with information about goods and services which may be of interest to you, and we or they may contact you about these by email, notification or SMS.

We may provide our advertisers with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in SW1). We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience.

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 UK Companies Act 2006.

We may disclose your personal information to 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 we or substantially all of our 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 terms of use [<http://www.spontly.com/terms>] and other agreements; or to protect the rights, property, or safety of us, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

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 at any time by contacting us at contact@spontly.com.

Our App, Site and Plug-in may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. 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 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.

Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to contact@spontly.com.