



Welcome to **Crowdville™** Privacy Policy.
Last changed on **October 11th 2018**.

Introduction

Clariter Limited respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

This privacy policy is provided in a pdf layered format so you can click through to the specific areas set out below. Please also use the [Glossary](#) to understand the meaning of terms used in this privacy notice.

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1. Important information and who we are

Purpose of this privacy policy

Clariter Ltd, commonly known as Crowdville ('Crowdville', 'we', or 'us'), is a company registered in England and Wales with company registration number 08945468 who has as its registered office address 8 Gainsborough Road, London E11 1HT. Crowdville is part of an international Group of companies. This privacy policy explains how we use any personal information we collect about you ('you', 'your'), when you register with us, take part in campaigns or otherwise use or interact with facilities on our website, on our mobile applications and other interactive services.

This website is not intended for children and we do not knowingly collect data relating to children. You must be over 18 to register as a user of this website.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements the other policies and is not intended to override them.

Controller

Contact details

Our full details are:

Full name of legal entity: Clariter Ltd

Email address: dpo@crowdville.net

Postal address: **8 Gainsborough Road, London E11 1HT**

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under review. This version was last updated on **October 11th 2018** and historic versions can be obtained by sending an email to privacy@crowdville.net.

It is important that the personal data we hold about you is accurate and current. Please keep us informed and make sure the information you have supplied is accurate and up-to-date.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2. The data we collect about you

Personal data, or 'information', means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you.

We collect personal data about you when you register with us and set up your account (full name, date of birth, nationality, email, nickname and password). If you decide to connect with us through Facebook, Instagram or Twitter we may collect your basic profile information from them. In case you fail to complete the registration process by not submitting all the required information, your information will not be retained by us, apart from some limited information to prevent any fraud or misuse.

We also collect information when you voluntarily update your profile, complete any of the campaigns we invite you to participate in, or you provide feedback, comments or other information on our website.



Finally, we collect information about you using 'cookies' and functionally similar technologies. We have grouped together the different kinds of personal data we collect about you as follows:

- **Identity Data** includes your first name, maiden name, last name, marital status, title, gender, date and place and country of birth, nationality, residential address, country of domicile, identity card number.
- **Contact Data** includes your billing address, delivery address, email address and telephone numbers.
- **Financial and Tax Data** includes your national insurance number, bank accounts or Paypal's account and payment card details and tax number, VAT number and pay pal details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from our third partners for the purposes of participating to any campaigns related to our Services.
- **Technical Data** includes your internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username or similar identifier such as your nickname and password, education, professional qualifications, details of employer, current job position, skills, interests, preferences, life style, location, feedback and survey responses, your attendances to our campaigns and rewards achieved, any products, you state that you own and/or you use during the campaigns, such as your mobile device(s), television, computer, decoder, car, motorcycle, any services you have subscribed, such as Sky TV, Netflix, car Insurance, social media accounts including facebook, Instagram, apple ID, and google ID.
- **Usage Data** includes information about how you use our website, including the list of the campaigns you have participated.
- **Products and Services Usage Data** includes details of your mobile devices and other electronic devices, mobile phones operator, video entertainment services, music entertainment services, banking services, landline operator service.
- **Posted Data** includes any personal information about you that you post on our website or that of a third party such as Facebook, Instagram, or Twitter.
- **Marketing and Communications Data** includes information about your preferences in receiving marketing from us and our third party clients and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data with other companies in our Group and with our clients for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

Although we do not request or deliberately collect any **Special Categories of Personal Data** (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data) or information about any criminal convictions and offences (together "Sensitive Data") from you, you are responsible for the information you provide to us through our website or otherwise make public. Posting Sensitive Data or defamatory comments will put you in conflict with our Terms of Use and we will delete it immediately. We will not process Sensitive Data for any purpose other than to remove it from our website. Our lawful basis for processing Sensitive Data in this manner is that it is information you have chosen to make public.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to register you as a user or rewarding you when you complete a campaign) but we will notify you if this is the case at the time.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** We collect personal information about you whenever you use our website and when you correspond with us by post, phone, email or otherwise. This includes personal data you provide us when you:
 - create an account and set up a profile on our website and otherwise interact with us;
 - create or share content and messages or communicate with other users;
 - use our website and apply to or complete a campaign quiz, survey or competition;
 - subscribe or request to receive our newsletters, publications and marketing campaigns; or
 - provide us with feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see [our cookie policy](#) for further details. We also collect your profile data automatically when you apply to participate in one of our campaigns.
- **Third parties or publicly available sources.** We may receive personal data about you from Facebook, Instagram or Twitter when you register yourself using Facebook, Instagram or Twitter. We may also receive personal information about you from other third parties, selected third party websites such as those where information about you is publically available, other platform users and our clients.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.



- With your consent.

Purposes for which we will use your personal data

We set out below a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific circumstances. Please [contact us](#) if you need further details about the legal ground we are relying on.

Necessary for the Performance of a Contract

In certain cases, we need to process your personal data to comply with a contractual obligation or in order to take steps to enter into a contract at your request. For example where we need to:

- Register, or take steps to register, you as a user and carry out our obligations to you such as:
 - providing the platform to allow you to interact with features on our website such as campaigns, prize draws, competitions and/or surveys;
 - selecting and delivering personalise content to you such as when you agree to take part in a campaign, to arrange for the campaign materials to be sent to you;
 - managing and processing payments, fees and any refunds owed to you or us;
 - communicating with you and administering our records; and/or
 - handling disputes.

Our Legitimate Interests

Otherwise, we may process your personal data where it is necessary for our legitimate interests. Broadly legitimate interests means the interest of our business in conducting and managing our business activities to enable us to give you the best service/product and the best and most secure experience. More specifically however we also have an interest in developing our business and brand image, creating reports, providing internal IT administration and keeping our website updated and relevant to you.

We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [contacting us via email at privacy@crowdville.net](mailto:privacy@crowdville.net). Examples of where we process your personal data on the basis of our legitimate interests include where we;

- carry out analysis and market research on our own behalf or on behalf of our clients to improve the quality of our website;
- prepare aggregated statistics and analytics that help our clients develop, test and improve their products;
- need to share your personal data with a Group company so that they may carry out some work on our behalf and under our control and responsibility such as assisting with the preparation of a report for a client;
- make suggestions and recommendations to you about which of our website features may be of interest to you;
- administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting data);
- deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising;
- use data analytics to improve our website and services;
- update our internal records and information regarding, for example, the popularity and activity of a campaign, engagement with advertising or reviewing the content you post on our website;
- providing our clients, advertisers and other partners with accurate and reliable anonymous reports;
- keep a record of all our active website users;
- append existing personal information about you to your responses to any campaigns you participate in to develop your profile; and
- maintain interactive features on our website allowing you to post information and engage with other users.

Compliance with a legal obligation

If the law requires us to, we may need to process your personal data in response to a lawful request by a public authority or to comply with a legal or regulatory obligations, for example;

- we believe in good faith that the disclosure is necessary to protect our rights;
- to protect your health and/or safety or the health and/or safety of others;
- to investigate fraud or breaches of our site terms or any other terms between us;
- to notify you about changes to our terms and conditions of this privacy policy; and
- to respond to a Government request.

Your Consent

Examples of where we process your personal data on the basis of your consent include;

- where we wish to send you newsletters, publications and/or other direct marketing communications such as marketing about campaigns or the products or services of our clients that are relevant to you based on the information you provided in response to our registration process or as may be updated by you at a later stage, provided that you have not indicated that you do not object to being contacted for these purposes;
- where we want to share information that reveals your identity to advertisers;
- where we want to share your personal information with our clients for the following purposes – so that they can send you mobile applications or other relevant campaign materials directly;
- where we want to pass your individual campaign responses together with your personal information to our client who commissioned the campaign. The client will only use this information for the purposes as explained in the relevant campaign such as to send you information directly which you may find useful regarding their products or services; or



- if a campaign requires your consent to allow you to participate such as where you agree to take part in a product test, to arrange for such product to be sent to you.

Where we share your personal information with our clients with your consent, we recommend that you review their privacy policy.

You have the right to withdraw consent or opt-out of receiving any marketing materials at any time [contacting us via email at privacy@crowdville.net](mailto:privacy@crowdville.net).

Automated decision making

We never make decisions about you using only technology where none of our employees or any other individuals have been involved.

Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. Please see our [cookie policy](#) for further details.

By continuing to use our site, you are agreeing to our use of cookies. Our lawful basis for processing the personal data we collect as a result of our use of cookies and the purposes for which it is processed are set out above.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact us](#).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes, and on the legal bases, set out in paragraph 4 (how to use your personal data) above:

- Internal Third Parties as set out in the [Glossary](#).
- External Third Parties as set out in the [Glossary](#).
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

You should be aware that any personal data you choose to make public on our website may be read, collected, stored and/or used by other users. We cannot guarantee that third parties who may collect and process your personal data from public forums will keep them secure.

Please be aware that we are not responsible for the personal data you choose to submit or make public. However you may set your privacy settings on your profile and limit the data you share to the groups you join, and other Crowdville users whom you message.

6. International transfers

The disclosure of personal information to the third parties set out above may involve the transfer of data to jurisdictions outside the European Economic Area (EEA). Any such transfers are made in accordance with the requirements of Articles 44 to 49 of the GDPR. Where such transfers are made to countries that do not have an adequacy decision in place, appropriate safeguards are implemented, such as:

- only transferring your personal data to them if they are part of the Privacy Shield, which imposes obligations on U.S. companies to protect Europeans' personal data;
- using specific contracts approved by the European Commission; or
- obtaining your consent prior to the transfer.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data outside the EEA.

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.



To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we may have to keep some basic information about you for six years after our relationship ends for tax purposes.

In some circumstances you can ask us to delete your data: see [Request erasure] below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notifying you.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- [Request access to your personal data.](#)
- [Request correction of your personal data.](#)
- [Request erasure of your personal data.](#)
- [Object to processing of your personal data.](#)
- [Request restriction of processing your personal data.](#)
- [Request transfer of your personal data.](#)
- [Right to withdraw consent.](#)

If you wish to exercise any of the rights set out above, please [contact us](#).

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Glossary

campaign(s): means any activity promoted and organised by us to you.

THIRD PARTIES

Internal Third Parties

The other companies in our Group who, in each case, act on our behalf and under our control as a data processor in respect of your information. The other companies in our Group are all based in Italy and provide us with IT and system administration services and undertake leadership reporting analysis for us.

External Third Parties

- Service providers based in Germany and Italy who provide IT and system administration services and data storage services.
- Our clients who are companies based in Italy, United Kingdom and Portugal as the case may be.

YOUR LEGAL RIGHTS

You have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction** of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.



- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.