

## Privacy Notice

Freedom Xpress Global Ltd („Company”) 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 when you visit our site or app ("Site") and tell you about your privacy rights and how the law protects you.

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

### 1. IMPORTANT INFORMATION AND WHO WE ARE

#### PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how Freedom Xpress Global Ltd collects and processes your personal data through your use of this Site, including any data you may provide through this Site when you sign up to our Site, browse or make a purchase via our Site, enter a competition or engage with us on our Site or through emails you may receive from us.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice 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 notice supplements the other notices and is not intended to override them.

#### CONTROLLER

Freedom Xpress Global Ltd is the controller and responsible for your personal data (collectively referred to as "Company", "we", "us" or "our" in this privacy notice).

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

#### CONTACT DETAILS

Full name of legal entity: Freedom Xpress Global Ltd

Email address: [info@freedomxpressglobal.com](mailto:info@freedomxpressglobal.com)

(For queries which do not relate to this privacy notice, please use [info@freedomxpressglobal.com](mailto:info@freedomxpressglobal.com))

Postal address: Unit 22 Bulrushes Business Park, Coombe Hill Road, East Grinstead, West Sussex RH19 4LZ, United Kingdom

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). 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 NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated in January 2019. This policy may change and be updated from time to time. Please check back regularly.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

#### THIRD-PARTY LINKS

This Site includes links to third-party Sites, 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 sites and are not responsible for their privacy statements. When you leave our Site, we encourage you to read the privacy notice of every website you visit.

## 2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal 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 which we have grouped together follows:

Identity Data includes first name, last name, username or similar identifier, title, date of birth and gender.

Contact Data includes billing address, delivery address and email address.

Financial Data includes bank account and payment card details.

Transaction Data includes details about payments from you to retailers featured on our Site from time to time and other details of products and services you have purchased from such retailers via our Site.

Technical Data includes 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 Site.

Profile Data includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.

Usage Data includes information about how you use our Site, products and services.

Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data 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 Site 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 notice.

We do not collect any Special Categories of Personal Data about you (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). Nor do we collect any information about criminal convictions and offences.

#### 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 provide you with the cashback service). In this case, you will not be able to join us.

### 3. HOW IS YOUR PERSONAL DATA COLLECTED?

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

Direct interactions. You may give us your Identity, Contact, Transaction or Financial Data by filling in forms or by corresponding with us by post, email or otherwise. This includes personal data you provide when you:

create an account on our Site;

submit a claim or enquiry about a transaction via our Site;

enter a competition, promotion or survey;

give us some feedback; or

Automated technologies or interactions. As you interact with our Site, 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. We may also receive Technical Data about you if you visit other Sites employing our cookies. Please see our Cookie Policy for further details. As you navigate our Site, we may collect Usage Data, Profile Data and Marketing and Communications Data as specified by you from time to time.

Essential Third parties. In order to facilitate the cashback service, we need to receive personal data about you from various third parties as set out below:

Technical, Transactional, Identity and Contact Data from the following parties:

- a) Affiliate Networks based both inside and outside the EU;
- b) retailers featured on the Site from time to time.

To help improve the service we provide and the functionality of our Site we may receive personal data about you from various third parties as set out below:

- a) Technical Data from analytics providers such as Google based outside the EU;
- b) Profile Data in the form of a mosaic profile from providers such as Experian; and
- c) Contact and Technical Data where you join our Site as a result of our marketing activities involving third parties.

#### 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.

#### PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, 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.

## What is a legitimate interest?

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience on our Site. 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 [info@freedomxpressglobal.com](mailto:info@freedomxpressglobal.com).

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party. If you fail to provide personal data that we require for the performance of a contract with you we cannot enter into a contract with you for the provision of our services.

	<b>Activity/Purpose</b>	<b>Type Of Data</b>	<b>Lawful Basis For Processing Including Basis For Legitimate Interest</b>
1.	<p>Provide our service to you. This includes but is not limited to:</p> <ul style="list-style-type: none"><li>• Processing and facilitating any cashback, benefits due to you</li><li>• Managing payments from your account including sending a payment via third parties.</li><li>• Processing of missing cashback, benefits payments (once received from networks)</li></ul>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Financial</p> <p>(d) Transaction</p>	<p>Performance of a contract with you.</p>
2.	<p>Answering and processing any claims or enquiries you may raise with us including:</p> <ul style="list-style-type: none"><li>• submission and actioning of any enquiry from you</li><li>• submission of a claim for missing cashback</li><li>• contesting claims</li><li>• escalating and formal complaints</li></ul> <p>in order to ensure your cashback process runs smoothly, provide any assistance with the Site and challenge and defend any claims or actions which may be detrimental to our business.</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Transaction</p>	<p>Necessary for our legitimate Interests to provide the most effective service to the members and for evidential purposes in the event of a dispute.</p>

3.	<p>Utilising fraud prevention measures in order to protect the business, members and retailers featured on the Site from fraudulent activity and any resulting consequences.</p>	<p>(a) Identity (b) Contact (c) Transaction (d) Technical (e) Profile</p>	<p>Necessary for our legitimate interests to prevent fraud.</p>
4.	<p>Managing our relationship with you, for example:</p> <ul style="list-style-type: none"> <li>• Notifying you about changes to our terms or privacy policy</li> <li>• Updating your details on our system, validating a payout request or resetting a security question</li> </ul> <p>in order to keep our records updated</p>	<p>(a) Identity (b) Contact (c) Profile (d) Marketing and Communications (e) Technical</p>	<p>Necessary for our legitimate interests of updating customer details and preferences.</p>
5.	<p>Promoting features on the Site, such as:</p> <ul style="list-style-type: none"> <li>• enabling you to partake in a prize draw, competition or complete a survey</li> <li>• when you provide case studies for use in the media</li> </ul> <p>in order to study how customers use the products and services on Site; to keep our records updated and to promote engagement with the Site.</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications</p>	<p>Necessary for our legitimate interests of promoting the Site and building our brand.</p>
6.	<p>Carrying out marketing campaigns to attract new members. To do this, we use different channels of lead generation.</p> <p><b>Lead generation campaigns</b> If you join our Site as a result of being redirected from a third party site, we may pay the referrer a commission. In order to do this, we share data with affiliate networks and tracking agencies in order to calculate and pay any commission due.</p> <p><b>Pay per click</b> If you join our Site as a result of clicking on our webpage from a search engine such as Google or Bing, this will be tracked by a third party. Your data will be shared between us and the third party tracking company in order to calculate how many new members have joined the Site and how much commission is due.</p> <p><b>App Marketing</b> If you download our App as a result of it being promoted on a third party site, this activity will have been reported to us. We use third parties to monitor the promotion and download of our App. We use your data generated by your download and use of the App to analyse your activity on the Site.</p> <p><b>Social Media marketing</b> We like to market the Site to new or existing members. In order to ensure our marketing is appropriate and relevant, we find ways of ensuring any marketing promotions are targeted at the right people. In order to do this, we may share your data with large social media pages to ensure our marketing reaches the target audience.</p>	<p>(a) Contact (b) Technical (c) Marketing and Communications</p>	<p>Necessary for our legitimate interests to engage in marketing activities.</p>

7.	<p>To administer and protect our business and this Site such as:</p> <ul style="list-style-type: none"> <li>• troubleshooting</li> <li>• data analysis</li> <li>• testing</li> <li>• system maintenance</li> <li>• support</li> <li>• reporting and hosting of data</li> </ul> <p>in order for the efficient running of the Site, provision of administration and IT services, network security and in the context of a business reorganisation or group restructuring exercise.</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p> <p>(d) Financial</p> <p>(e) Transactional</p>	<p>Necessary for our legitimate interests of Site security</p>
8.	<p>Providing business insight into how members use the Site. We do this by:</p> <ul style="list-style-type: none"> <li>• delivering relevant Site content and advertisements to you and by measuring or understanding the effectiveness of the advertising we serve to you</li> <li>• using data analytics</li> <li>• making suggestions to you about goods or services that may be of interest to you</li> </ul> <p>for the use of web analytics, profiling and personalisation in order to study how customers use our services, to develop them, to grow our business and to ensure our marketing strategy is as relevant and accurate as possible.</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p> <p>(f) Technical</p>	<p>Necessary for our legitimate interests in order to produce the most effective Site and member experience.</p>

**MARKETING**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. Within your account you can view and make certain decisions about your personal data use in relation to marketing emails.

**PROMOTIONAL OFFERS FROM US**

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have signed up to our Site and you have not opted out of receiving marketing emails.

### THIRD-PARTY MARKETING

We will never sell your personal data to any company for marketing purposes. As referred to above, we may share your Contact or Identity Data with certain third parties e.g. sub-processors to facilitate the delivery of marketing emails to you and social media publishers, in order to ensure our marketing is targeted at and relevant to members.

### OPTING OUT

You can ask us to stop sending you marketing emails at any time by logging into your account on the Site and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing email sent to you.

### COOKIES

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 Site will become inaccessible or not function properly resulting in your cashback not tracking.

### 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 at [info@freedomxpressglobal.com](mailto:info@freedomxpressglobal.com).

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 have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

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 notice.

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.

## 6. INTERNATIONAL TRANSFERS

Some of our external third parties are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.

Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.

Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

Please contact us at [info@freedomxpressglobal.com](mailto:info@freedomxpressglobal.com) if you want further information on the specific mechanism used by us when transferring your personal data out of 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.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us at [info@freedomxpressglobal.com](mailto:info@freedomxpressglobal.com).

In some circumstances you can ask us to delete your data.

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 notice to you.

## 9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

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.

#### 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

### External Third Parties

Service providers who provide IT and system administration services

Various Affiliate Networks who track your purchases made via the Site

Retailers as featured on the Site from time to time (in rare circumstances where your tracking through the Affiliate Network has failed and we need to investigate with the retailer direct)

Regulators and other authorities based in the United Kingdom who may require reporting of processing activities in certain circumstances

Various payout providers as offered on the Site from time to time. Some of these providers may be based in the US

Depending on your marketing preferences, we may engage third party email providers

Social media publishers

Various tracking agencies where you have joined our Site as a result of a third party referrer

Affiliate Networks means a network that acts as an intermediary between our Site which features products and services and the retailers who create or sell those products and services. The affiliate network reports the tracking of cashback, any payments and refund processing together with assisting with any untracked sales which you may tell us about.