

## **PRIVACY POLICY**

Version 2.0 - April 2019

#### **OVERVIEW**

Your privacy is important to us. This Privacy Policy sets out the procedures Payar Limited has in place in relation to the collection, use and disclosure of information you may provide or we may collect via this website and/or the toodle mobile application.

#### **Your Consent**

By using this Website and/or the toodle mobile application, you agree with the terms of this Privacy Policy and whenever you submit information via this Website, you consent to the collection, use and disclosure of that information in accordance with this Privacy Policy.

### **Active Collection of Information**

Some areas of the Website and/or the toodle mobile application require you actively to submit information in order for you to benefit from specific features. Some of this information may be personal (namely, information that can identify you, such as your name, address or phone number). We only collect such information when you choose to supply it to us. You confirm that you will only enter information about yourself and that such information is true.

# **Passive Collection of Information**

We may collect and process anonymous information about your visit to this Website, such as some of the pages you visit and some of the searches you perform. Such information is used by us to help us improve the contents of the site and to compile, for internal market research purposes, aggregate statistics about individuals using it.

This kind of anonymous information can be obtained by our use of "cookies". A "cookie" is a small piece of information that is sent to your browser and stored on your computer's hard drive. We use cookies in three ways:

1. "per-session cookies" are used while you are visiting the Website to keep track of your progress through the booking process. These do not store any personal information and are deleted when you close your web browser;

2. "looker cookies" store historic data about your visits to our Website and/or the toodle mobile application and allow us to personalise your site experience and make recommendations to you about products and services that we think may be of interest to you.

With most web browsers it is possible to configure your Internet browser so that it can refuse new cookies, prompt you to accept a cookie or disable cookies altogether. How you do this will depend on the Internet browser you use — however, refusing to accept "per-session cookies" may result in our Website not operating correctly.

For further details on cookies, we recommend that you visit www.allaboutcookies.org.

We may also use Internet tags in combination with "cookies" on the Website and/or the toodle mobile application. These tags are placed on both on-line advertisements that bring users to the Website and/or the toodle mobile application and on different pages of the Website and/or the toodle mobile application.

We use this technology to measure visitor response to our sites and the effectiveness of our advertising campaigns.

The third party service provider involved may be able to collect anonymous aggregated data about visitors to other sites because of these Internet tags and cookies, and the servers on which this data is stored may either be located within or outside the United Kingdom.

# **Use of Information Collected**

Your personal information submitted to us is used for operational purposes, for example, when you enter your details in the contact us page, and when you enter your name and email address to subscribe to our newsletter.

## **Sharing of Information**

We may share your personal information with third party service providers (including service providers outside of the UK). These service providers will only have access to the personal information needed to



perform the relevant service and may not use your personal information for any other purpose. They will also be required to use your personal information strictly in accordance with data protection laws, including maintaining adequate security measures to protect such personal information.

We may also share your personal information with legal or regulatory authorities where we are lawfully requested or required to do so, or voluntarily to the Police and similar law enforcement agencies (including fraud prevention and detection), other government agencies or third parties.

We may further use your personal information to contact you about new features, services, and in line with the consent you have provided. If you do not wish to receive this information, you may choose not to do so by clicking where indicated. If you initially wish to receive such material but you change your mind later, you may tell us by contacting us at the below mentioned address.

## Security

We take the security of your data very seriously. We employ physical, electronic and administrative security measures to protect the information that we collect about you from access by unauthorised persons and against unlawful processing, accidental loss, destruction and damage. You acknowledge and agree that we shall not be responsible for any unauthorised use, distribution, damage or destruction of personal data, except to the extent we are required to accept such responsibility by the applicable data protection laws.

You understand that your content (not including Payment Card (defined as a Debit or a Credit Card) information), may be transferred unencrypted and involve (a) transmissions over various networks; and (b) changes to conform and adapt to technical requirements of connecting networks or devices.

Payment Card information is always encrypted and/or tokenized during transfer over networks. The site and the toodle mobile app are compliant with the Payment Card Industry Data Security Standards (PCI-DSS) and the Payment Application Data Security Standards (PA-DSS), as applicable.

Card Data (defined as a cardholder's account number, expiration date and CVV2) is not stored on any of the servers operated by Payar Limited and is instead held in a Payment Card Vault operated by Spreedly, Inc.

Spreedly, Inc. is a PCI Level 1 certified Service provider and is responsible for protecting the security of Card Data in their possession and will maintain commercially reasonable administrative, technical and physical procedures to protect all the personal information regarding toodle mobile app users, Payar Limited and its Affiliates, Business and Merchant Partners that is stored in the Spreedly, Inc. servers from unauthorized access and accidental loss or modification.

Spreedly, Inc. cannot guarantee that unauthorized third parties will never be able to defeat those measures or use such personal information for improper purposes. You acknowledge that you provide this personal information at your own risk.

For more information about Spreedly, Inc. please visit their website at <a href="https://www.spreedly.com">www.spreedly.com</a>.

# Links to third party Internet sites

This Website may contain links to other sites. By clicking on these, you will leave this Website and this Privacy Policy will not apply to your use of any other sites.

## **Changes to this Privacy Policy**

There may be developments in how we use your data. All such developments will be notified to you by updating this Privacy Policy.

### **Access to Personal Information**

You are entitled to see the personal information we hold about you and may obtain these details by writing to us at:

The Directors
Payar Limited
4th Floor Imperial House
8 Kean Street
London
United Kingdom
WC2B 6AS

We will require proof of your identity before we supply the information to you.