

PRIVACY POLICY

Last Updated on 10 April 2020. This Privacy Policy is effective immediately for Users after that date.

Givvy Ltd. ("Givvy", "we," "us,"), a company incorporated and existing under the laws of the Republic of Bulgaria, registered under company number 206041372, having its seat and registered office at Bulgaria, Sofia, Studentski Grad, Prof. Hristo Danov Str., No.11, entr. C, ap. 12, respects your privacy and is committed to protecting it through our compliance with this Privacy Policy.

This Privacy 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. By using the Givvy mobile application (the "Mobile App"), you are accepting and consenting to the practices described in this Privacy Policy.

The definitions of the terms in this Privacy Policy have been referred by the Terms and Conditions of the Mobile App.

Givvy qualifies as a Data Controller under the Regulation (EU) 2016/679 of The European Parliament and of The Council of 27 April 2016 (General Data Protection Regulation (the "GDPR")). As such, we aim to comply with all legal obligations which the GDPR implies on Data Controllers.

Givvy strives to offer its visitors and Users the many advantages of Internet technology and to provide an interactive and personalized experience. For these purposes, we, from GIVVY, may use personally identifiable information – like your e-mail address, which is subject to the terms of this Privacy Policy. We, and we suppose you too, do not tolerate spam. We will therefore never sell, barter, or rent your email address to any unauthorized third parties.

1. WHAT INFORMATION DO WE COLLECT FROM OUR USERS?

Givvy may collect and use information of and regarding its Users. We collect only data which is essential to our operations and enables us to provide you with better user experience.

1.1. Information you give us.

You may give us information about you by submitting information such as your name, email address, telephone number or address on the Mobile App, when prompted or when corresponding with a member of the Givvy team.

1.2. Information we collect about you.

We collect two types of information from and about our Users, including information:

- by which you may be personally identified; and/or
- about your internet connection, the equipment you use to access our Services, your IP address and your usage details (i.e. your Internet Service Provider).

1.3. The information we collect on or through our Services may include:

- (i) *Personal information:* Your name, email address, telephone number and/or address. We collect this information in order to allow you benefit from the services offered on the Givvy Mobile App.
- (ii) *Preferences:* Your preferences and settings such as time zone and language. We collect this information in order to provide you with a personalised experience.
- (iii) *Searches and other activities:* The search terms you have looked up, in order to reach the Mobile App. We collect this information in order to monitor our performance and improve our services.
- (iv) *Browsing information:* How long you used our Services. We collect this information in order to monitor assess the performance of our services.
- (v) *Communications:* Between you and GIVVY support staff regarding the Services. We collect this information in order to improve your customer service experience.

The legal basis for the above processing is GDPR art. 6(1)(b), since the processing is necessary in order to enter into a contract and for the performance the contract (i.e. identifying you as a User using the Mobile App and using the Services and/or participating in any giveaways).

2. HOW WE GATHER INFORMATION FROM USERS?

- 2.1. How we collect and store information depends on the pages you are visiting, the activities in which you elect to participate and the services provided. For example, you may be asked to provide information when you register for a User Account.
- 2.2. Like most websites, Givvy also collects information automatically and through the use of electronic tools that may be transparent to our visitors and Users. For example, we may log the name of your Internet Service Provider, your IP address, or use “cookies” technology to recognize you and hold information from your visit. Among other things, the cookies may store your username and password, sparing you from having to re-enter that information each time you visit, or may control the number of times you encounter a particular part of the Mobile App. As we use additional technologies, we may also gather information through other means. In certain cases, you can choose not to provide us with information.

3. WHAT WE DO WITH THE INFORMATION WE COLLECT? HOW LONG DO WE COLLECT IT FOR?

- 3.1. Like other websites, we collect information to enhance your visit and deliver more individualized content. We respect your privacy and do not share your information with anyone, except in cases when that proves necessary.
- 3.2. We will retain the information we collect from you for a period of five years. After the expiry of this period we undertake to delete any information we have collected from you.
- 3.3. Aggregate information and information that does not personally identify you, may be used in many ways. For example, Givvy may combine information about your usage patterns on the Mobile App with similar information obtained from other users to help enhance our site and Services (e.g., to learn what giveaways Users prefer the most). This information does not include any information about you and does not allow anyone to identify you individually.
- 3.4. We may use personally identifiable information, collected on the Mobile App, to communicate with you about your User Account; the Givvy Services and giveaways; our Terms of Service and Privacy Policy; services and products offered by or through the Givvy Mobile App; and other topics we think you might find of interest. Personally identifiable information collected by GIVVY may also be used for other purposes,

including but not limited to Mobile App administration, troubleshooting and other communications with you.

- 3.5. Certain third parties who provide technical support for the operation of our Mobile App – our Web hosting service for example – may have access to such information. We will use your information only as permitted by law. We may also disclose your information in response to a court order, at other times when we believe we are reasonably required to do so by the applicable law, in connection with the collection of amounts you may owe to us, and/or to law enforcement authorities, whenever we deem it appropriate or necessary. Please note we may not provide you with notice prior to disclosure in such cases.

4. DISCLOSURE

- 4.1. Givvy LTD. won't transfer information about you to third parties for the purpose of providing or facilitating third-party advertising to you. We won't sell information about you.
- 4.2. We may share your account information with third parties in some circumstances, including: (1) with your consent; (2) to a service provider or partner who meets our data protection standards; (3) when we have a good faith belief it is required by law, such as pursuant to a subpoena or other legal process; (4) when we have a good faith belief that doing so will help prevent imminent harm to someone.
- 4.3. If we are going to share your information in response to legal process, we'll give you notice so you can challenge it (for example by seeking court intervention), unless we're prohibited by law or believe doing so may endanger others. We will object to requests for information about users of our services that we believe are improper.
- 4.4. As noted above, certain third parties who provide technical support for the operation of our Mobile App for example – may have access to such information.
- 4.5. If your personal data is transferred outside the EU/EEA, we will enter into EU standard contractual clauses approved by the European Commission prior to such transfer to ensure the required level of protection for the transferred personal data. If you require additional information and/or wish to obtain a copy of the standard contractual clauses (including relevant safeguards put in place), you can request this by contacting us as set out in section 10.

5. YOUR RIGHTS

5.1. Right to withdraw your consent

You may withdraw your consent for collecting your personal information at any time. To do so, please contact us at givvy.project@gmail.com.

5.2. Right to change or review your information

If you would like to review, change or delete personal data we have collected from you or you had submitted or permanently delete your account, please contact us. For more information regarding the termination or deletion of your information, please refer to Section 7: Termination of this Privacy Policy.

6. ACCESSING & CORRECTING YOUR PERSONAL INFORMATION.

6.1. We take reasonable steps to accurately record the personal information that you provide to us, as well as any subsequent updates.

6.2. We encourage you to review, update, and correct the personal information that we maintain about you. You may request that we delete personal data about you that is inaccurate, incomplete, irrelevant for legitimate purposes, or are being processed in a way which infringes any applicable legal requirements.

7. TERMINATION

7.1. As mentioned above, you may at any time review or change the personal information we maintain about you by contacting Givvy. Upon your request, we will delete your contact information and personal data from our active databases.

7.2. This Privacy Policy is effective until terminated by either party. If you no longer agree to be bound by this Privacy Policy, you must cease the use of Mobile App and your participation in the Givvy giveaways. If you are dissatisfied with Givvy Mobile App, its' content, or any of these terms, conditions, and policies, your sole legal remedy is to discontinue using the Mobile App. GIVVY reserves the right to terminate or suspend your access to and use of the Mobile App, or parts of it, without notice, if we believe, in our sole discretion that such use is in violation of any applicable law, or harmful to our interests or the interests of another person or entity, or where Givvy has reasons to believe that their use is in violation of this Privacy Policy or the Terms of Use.

8. CHILDREN'S PRIVACY

GIVVY does not knowingly collect personal information from children under the age of 18. If we learn that we have personal information on a child under the age of 18, we will delete that information from our servers. GIVVY encourages parents to go online with their kids.

9. OTHER PROVISIONS

9.1. Changes to This Policy

Givvy reserves the rights to change this Privacy Policy at any time. Please check this page periodically for changes. Your use of the services after any such amendment or change in the Privacy Policy shall be deemed as your express acceptance to such amended/changed Privacy Policy and an assent to be bound by such changed/amended Privacy Policy. Information collected prior to the time any change is posted will be used according to the rules and laws that applied at the time the information was collected.

9.2. Governing Law

This Privacy Policy and the use of the Mobile App are governed the laws of the Republic of Bulgaria. The parties undertake to first try to resolve the dispute with by negotiation. If the parties fail to reach an amicable resolution through negotiation, the parties hereby to submit the dispute to the competent Court of the Republic of Bulgaria.

10. MISCELLANEOUS

10.1. Givvy is controlled, operated and administered entirely within the Republic of Bulgaria.

10.2. If you are accessing Givvy Mobile App from another jurisdiction, please be advised that you are transferring your personal information to Givvy in the Republic of Bulgaria and, by using the Mobile App, you consent to that transfer and to abide by the applicable laws concerning your use of the Mobile App and your agreements with us.

10.3. This statement and the policies outlined in this Privacy Policy are not intended to and do not create any contractual or other legal rights in or on behalf of any party.

10.4. Givvy may provide a translation of the English version of the Privacy Policy into other languages. You understand and agree that any translation of the Privacy Policy into other languages is only for your convenience and that the English version shall govern your rights and responsibilities. In case there are any inconsistencies between the English version of the Privacy Policy and its translated versions, the English version of the Privacy Policy shall prevail.

11. CONTACT

If you believe GIVVY does not adhere to this Privacy Policy, in order to address a question, to resolve a complaint regarding the Mobile App or GIVVY Services, or to receive further information regarding the Services, please contact GIVVY using one of the following methods:

Address: ul. "Prof. Hristo Danov" 11, 1700 Studentski Kompleks, Sofia

e-mail: givvy.project@gmail.com

Telephone: +359 883 449 874