

# Privacy Policy

## Introduction

Last modified [18 May 2025]

This privacy notice describes how we will collect, use, share and otherwise process your personal data in connection with your use of:

- [CONTENDO v1.0.1] (which was last updated on [DATE]) mobile application software (**App**).
- Any of our services that are accessible through the App (**Services**)

This App is not intended for those under 13 and we do not knowingly collect data relating to children.

Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

This notice is provided in a layered format so you can click through to the specific areas set out below.

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## Important information and who we are

CONTENDO LTD is the controller and is responsible for your personal data (**COMPANY, we, us** or **our** in this notice).

## Contact details

Our full details are:

- Full name of legal entity: Contendo Ltd
- Email address: admin@contendo.co.uk
- Postal address: 75 Totterdown Street, London, SW17 8TB

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues.

## Changes to the privacy notice and your duty to inform us of changes

We keep our privacy notice under regular review.

This version was last updated on [DATE]. It may change and, if it does, those changes will be posted on this page and notified to you [by email]. You may be required to read and acknowledge the changes to continue your use of the App or the Services.

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 our relationship with you. Please visit the [Settings] section of your [Profile] to update your details.

## Third party links and sites

Our App and Services may, from time to time, contain links to and from the websites of third parties. Please note that these websites (and any services accessible through them) are controlled by those third parties and are not covered by this privacy notice. You should review their own privacy notices to understand how they use your personal data before you submit any personal data to these websites or use these services.

## The data we collect about you

We collect, use, store and transfer different kinds of personal data about you. To make it easier for you to use this privacy notice, we group these into the following categories. Each of these categories is described in more detail at [Description of categories of personal data](#).

- Identity Data.
- Contact Data.
- Profile Data.

- Transaction Data.
- Device Data.
- Content Data.
- Usage Data.
- Security Data.
- Marketing and Communications Data.
- Location Data.
- Social Media Data.
- Feedback Data.

We do not intentionally 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).

We will collect data relating to criminal offences through the measures we take to secure and protect our App and users. Further details can be found at [Criminal offence data and special category data](#).

## How is your personal data collected?

We collect your personal data in the following way:

- **Registration.** We collect your Identity Data and Contact Data when you register your account with us.
- **Communications.** When you communicate with us via email, telephone, one of our online forms or chat we collect your Contact Data. If the communication relates to an error or problem you are having with the App or one of our Services, we will also collect Usage Data for diagnosis and improvement.
- **Information you generate when using our App and Services.** Each time you access and use our App and Services we collect Content, Device and Usage Data. We collect Content Data where you upload it to the App or interact with the content available on the App.
- **Information we collect through monitoring the use of our App, Sites and Services.** Each time you access and use our App and Services we collect information about that access and use, being Device, Content and Usage Data.

- **Additional information we otherwise collect through our App, Sites and Services where we have your consent to do so.** Where you provide your consent, we collect your Location Data on an ongoing basis while you have the App installed on your device.
- **Direct Marketing.** We collect and record Direct Marketing Data when we add you to our marketing database, you request to change your direct marketing preferences, or you interact with our direct marketing communications.
- **Social Media Data.** We collect Social Media Data when you choose to connect your social media account to your account.
- **Information we receive from third parties.** We will receive personal data about you from the third parties set out below:
  - Device Data from the following parties:
    1. analytics providers being Google and/or Apple
- **Unique application numbers.** When you want to install or uninstall a Service containing a unique application number or when such a Service searches for automatic updates, that number and information about your installation, for example, the type of operating system, may be sent to us.

## How we use your personal data

We will only use your personal data when we have a lawful basis to do so. Our lawful basis for each purpose for which we use your personal data is specified below. Most commonly we will use your personal data in the following circumstances:

- **Consent.** Where you have freely consented before the processing in a specific, informed and unambiguous indication of what you want. You can withdraw your consent at any time by contacting us (see [Your legal rights](#) below).
- **Performance of a contract.** Where we need to process your personal data to perform a contract with you or where you ask us to take steps before we enter into a contract with you. Where we rely on performance of a contract and you do not provide the necessary information, we will be unable to perform your contract.
- **Legitimate interests.** 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. 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. 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.

- **Legal obligation.** Where we need to use your personal data to comply with a legal or regulatory obligation. Where we rely on legal obligation and you do not provide the necessary information, we may be unable to fulfil a right you have or comply with our obligations to you, or we may need to take additional steps, such as informing law enforcement or a public authority or applying for a court order.

#### Delivery and improvement of our App and purchases

| Purpose or activity                                                                                                                                                                                       | Type of personal data                                    | Lawful basis for processing                       |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------|---------------------------------------------------|
| To permit you to install the App and register you as a new App user                                                                                                                                       | Identity<br>Contact<br>Financial<br>Device               | Legitimate interests (delivering our App to you)  |
| To take steps towards providing you with services at your request, to process and fulfil in-App purchases and deliver services to you, including managing payments and sending you service communications | Identity<br>Contact<br>Transaction<br>Device<br>Location | Performance of a contract                         |
| To provide you with your subscription benefits                                                                                                                                                            | Identity<br>Contact<br>Transaction                       | Performance of a contract                         |
| Enforce our terms and conditions, including to collect money owed to us                                                                                                                                   | Identity                                                 | Legitimate interests (to recover debts due to us) |

#### Account management and profiling

| Purpose or activity | Type of personal data | Lawful basis for processing |
|---------------------|-----------------------|-----------------------------|
|---------------------|-----------------------|-----------------------------|

|                                                                                       |                             |                                                           |
|---------------------------------------------------------------------------------------|-----------------------------|-----------------------------------------------------------|
| Combining the information we collect about you into a single customer account profile | Contact<br>Direct marketing | Legitimate Interests (to publicise and grow our business) |
|---------------------------------------------------------------------------------------|-----------------------------|-----------------------------------------------------------|

### Direct marketing

| Purpose or activity                                                            | Type of personal data                 | Lawful basis for processing                                                                                                                                        |
|--------------------------------------------------------------------------------|---------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| To send you direct marketing communications via email and/or push notification | Contact<br>Device<br>Direct Marketing | Consent<br><br>Unless we can rely on the soft opt-in and you have not opted out, in which case we rely on Legitimate Interest (to publicise and grow our business) |

### Troubleshooting, improvement and security

| Purpose or activity                                                                                                                | Type of personal data                       | Lawful basis for processing                                                                                                                                                                                                                                 |
|------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| To administer, monitor and improve our business, Services and this App including troubleshooting, data analysis and system testing | Identity<br>Contact<br>Device               | Legitimate interests (for running our business, provision of administration and IT services, network security, maintaining the security of our App and Services, providing a secure service to users and preventing fraudulent and other misuse of our App) |
| Applying security measures to our processing of your personal data, including processing in connection with the App                | All personal data under this privacy notice | Legal obligation (applying appropriate technical and organisational measures under Article 32 of the UK GDPR)                                                                                                                                               |

|                                                                                 |                                    |                                                                                                                                                                                                                                                         |
|---------------------------------------------------------------------------------|------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Otherwise monitoring use of the App and deploying appropriate security measures | Contact<br>Security<br>Transaction | Legitimate interests (running our business, provision of administration and IT services, network security, maintaining the security of our App and services, providing a secure service to users and preventing fraudulent and other misuse of our App) |
|---------------------------------------------------------------------------------|------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

### Rights and obligations

| Purpose or activity                                                                                                                                   | Type of personal data                       | Lawful basis for processing |
|-------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------|-----------------------------|
| To comply with our other legal obligations, including compliance with tax legislation, judicial, law enforcement and government authorities' requests | All personal data under this privacy notice | Legal obligation            |

### Other communications

| Purpose or activity                                                                                              | Type of personal data       | Lawful basis for processing                                                                                                                           |
|------------------------------------------------------------------------------------------------------------------|-----------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|
| To notify you of changes to the App, Services, your purchases and our terms and conditions for ongoing contracts | Contact                     | For ongoing or prospective contracts, Performance of a contract<br><br>Otherwise, Legitimate interests (in servicing our users and prospective users) |
| To notify you of updates to this privacy notice                                                                  | Contact<br>Transaction      | Legal obligation (to inform you of our processing under Articles 13 and 14 of the UK GDPR)                                                            |
| To respond to your requests to exercise your rights under this notice                                            | As relevant to your request | Legal obligation (complying with data subject requests under Chapter 3 of the UK GDPR)                                                                |

|                                                                                                                           |                                        |                                                                                                                                                                                               |
|---------------------------------------------------------------------------------------------------------------------------|----------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| To ask you to complete a survey and process your response (where applicable, please also see the separate privacy notice) | Contact                                | Legitimate interests (to analyse how users use our products or Services and to develop them and grow our business)<br><br>Unless you have previously opted out, where we will rely on Consent |
| To otherwise respond to your enquiries, fulfil your requests and to contact you where necessary                           | As relevant to your enquiry or request | Legitimate interests (service our users and prospective users)                                                                                                                                |

### Business contacts

| Purpose or activity                                                                                                    | Type of personal data | Lawful basis for processing                                                                                                          |
|------------------------------------------------------------------------------------------------------------------------|-----------------------|--------------------------------------------------------------------------------------------------------------------------------------|
| Process personal data relating to staff members of our business contacts, including suppliers, customers and prospects | Contact               | Legitimate interests (servicing and receiving products or services, to or from our business contacts and carry out our B2B business) |

### Automated decision making and profiling

We do not make decisions based solely on automated processing or profiling that produce legal effects concerning you (or have similarly significant effects).

### Criminal offence data and special category data

We do not intentionally collect criminal offence data about you. However we may process data relating to criminal offences in monitoring the use of our App for security purposes, where we suspect you may have committed a crime, such as attempting to make a fraudulent purchase or claim or circumvent the security of the App or Services. In such circumstances we will provide that information to law enforcement and/or use it to establish, exercise or defend a legal claim. In those circumstances, according to the type of activity and purpose, we will rely on legitimate interests (protecting our business, employees and other users) and legal obligation (where required by legal, judicial or law enforcement to disclose or process that information). UK law authorises that processing under the Data Protection Act 2018 and although the appropriate authorisation will depend on a case-by-case basis, monitoring for criminal behaviour through the use of our App is in the Substantial public interest (preventing or detecting unlawful acts) and



processing information related to suspected criminal activity for legal claims is permitted under the additional condition of authorised under applicable national law.

### Special categories of personal data

We process the following special categories of personal data about you.

| Purpose or activity | Type of personal data | Lawful basis for processing | Processing condition |
|---------------------|-----------------------|-----------------------------|----------------------|
| N/A                 | N/A                   | N/A                         | N/A                  |

## Disclosures of your personal data

We may share your personal data with the following third parties:

- **External third parties.**
  - Your Appstore Provider and mobile network operator to allow you to install the App.
  - Service providers acting as processors based in the UK who provide IT and system administration services, hosting services for our App, delivery and logistics services, payment processing, fraud and identity verification providers, customer service support, email delivery and administration, and data storage and analysis.
  - Our professional advisors acting as controllers based in the UK including lawyers, auditors, insurers and consultants who provide legal, accounting, insurance and consulting services.
  - Your service providers that you have appointed and we need to contact to fulfil your requests, such as your banking or payment card provider to process your transactions.
  - Marketing and promotional partners and co-operatives acting as processors or controllers or joint controllers based in the UK with whom we share data to enhance our offerings and identify prospective customers.
  - 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.

- HM Revenue and Customs, regulators, law enforcement, public authorities or other third parties acting as controllers based in the UK where necessary to exercise our rights or comply with a legal obligation.

## International transfers

We do not transfer your personal data outside the UK.

## Data security

All information you provide to us is located in the UK. Where we have given you (or where you have chosen) a password that enables you to access certain parts of our App or Services, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Once we have received your information, we will use strict procedures and security features to protect your personal data from loss, unauthorised use or access.

Certain Services include social networking, chat room or forum features. Ensure when using these features that you do not submit any personal data that you do not want to be seen, collected or used by other users.

We have put in place procedures to detect and respond to personal data breaches and notify you and any applicable regulator when we are legally required to do so.

## Data retention

In some circumstances you can ask us to delete your data: see [Your legal rights](#) below for further information.

Once we no longer have a legal right to hold your personal data, we will delete or, in some circumstances, we will 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.

If you do not use the App for a period of **[7 years]** then we will treat the account as expired and will delete your personal data.

## Your legal rights

You have the following rights under data protection laws in relation to your personal data.

- **Access.** Request access to and/or a copy of the personal data we process about you (commonly known as a data subject access request). This enables you to check that we are lawfully processing it.
- **Correction.** Request correction of any incomplete or inaccurate data we hold about you (we may need to verify the accuracy of the new data you provide to us.)
- **Deletion.** Request us to delete or remove personal data where there is no good reason for us continuing to process it. You also can ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we have processed your information unlawfully or where we need to erase your personal data to comply with law (in some cases, we may need to continue to retain some of your personal data where required by law. If these apply, we will notify you at the time of our response.)
- **Objection.** Object to us processing your personal data where (a) we are relying on legitimate interests as the lawful basis and you feel the processing impacts on your fundamental rights and freedoms, or (b) the processing is for direct marketing purposes. In some cases, we may refuse your objection if we can demonstrate that we have compelling legitimate grounds to continue processing your information which override your rights and freedoms.
- **Restriction.** Request that we restrict or suspend our processing of your personal data:
  - if you want us to establish the data's accuracy;
  - where our use of the data is unlawful, but you do not want us to erase it;
  - where we no longer require it, but you need us to hold onto it to establish, exercise or defend legal claims; or
  - you have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.
- **Data portability.** Request we transfer certain of your personal data to you or your chosen third party in a structured, commonly used, machine-readable format. This right only applies to information processed by automated means that we process on the lawful bases of consent or performance of a contract.
- **Withdraw consent.** Withdraw your consent at any time where we are relying on consent to process your personal data. Please know that this does not affect the lawfulness of any processing carried out before you withdraw your consent, and after withdrawal, 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.

- **Complain to the UK data protection regulator.** If you are unhappy with how we process your personal data, we ask that you contact us first using the details below so that we have the chance to put it right. However, you also have the right to make a complaint to the ICO at any time.

You can exercise any of these rights at any time by contacting us at [admin@contendo.co.uk](mailto:admin@contendo.co.uk)

## Description of categories of personal data

- **Identity Data:** first name, last name, title, sex, postcode, date of birth and Profile Data.
- **Contact Data:** first name, last name, contact address, email address and telephone numbers, your communication preferences and copies of the communications between you and us.
- **Profile Data:** your email address, username and password.
- **Transaction Data:** billing and delivery addresses, payment card details, history of your payments, purchases, deliveries, returns and refunds and the applicable terms and conditions of your purchases.
- **Device Data:** the type of device you use, your unique device identifier, mobile network information, your mobile operating system, the type of mobile browser you use, IP address and time zone setting.
- **Content Data:** information that you store in the App, being photos, videos and associated metadata, check-ins, posts and messages.
- **Usage Data:** logs and detail of your use of our Apps and Services, being the dates and times on which you download, access and update the App and our Services, any error or debugging information, and the actions we and you take in relation to them.
- **Security Data:** information we collect about your use of the App, our Services and our Sites in order to ensure your and our other users' safety and security, being Usage Data and the information provided to us by our payment processing provider.
- **Direct Marketing Data:** your direct marketing preferences, consents for receiving direct marketing from us and/or our third parties and the history of the direct marketing communications we have sent to you.

- **Location Data:** your current location as disclosed by GPS technology WiFi connections, your IP address for the time period where you have permitted us to collect it.
- **Social Media Data:** your social media account information.
- **Feedback Data:** your feedback and survey responses.