

Privacy Policy

1. Our Commitment to Privacy

As we work with you to build better relationships, we are committed to protecting your privacy. For any personal data we collect as part of your journey with us, this Privacy Policy (“Policy”) explains why we collect the data, what we do with the data, and your rights and choices when it comes to your personal data.

When you use our mobile application (“App”), access our website at www.paired.com (“Website”), or interact and communicate with us via our online or social media channels, this Policy will apply to you. For this policy, we will refer to all these touchpoints with you as our services (“Services”).

So we can remain transparent about how we use your personal data, when there are significant updates to the Policy we will notify you. This Policy was last updated on 8th November 2022.

2. Who is collecting your data

You know us as Paired, but as a legal entity we are Better Half Limited, a company registered in England and Wales (“we”, “our”, “us”) and are the data controller. We decide what personal data is collected from you and how this data will be used.

Our Services may contain links to sites run by our experts and other websites such as Twitter, Facebook, and Instagram. These experts and third-party organisations will have their own privacy policies, which you should read carefully before providing any of your personal data to them, as we do not accept any responsibility or liability for them.

3. How we collect and use your personal data

Identity Information

When you use the App, we collect: your name and a unique user code we supply you with to allow you and your partner to pair your Apps; your device id so that we are able to identify you as one of our users. We may also collect your email address to allow you to create an account with us.

Personal Information (username, profile photo, etc.)

You may decide to submit a cover photo, profile photo, username, couple anniversary date, and other relationship information in order to personalise your own profile.

We may use this data to improve the level of personalisation of the App and relevance of content for you and your partner. This information is not required in order to use the app.

Activity Information

When you use the App, we collect: your responses to our conversations so that we may share these answers and your progress with you, and your partner where you have chosen to pair your App; information about when you pair with your partner; your course and tip completion so that we may share your progress with you.

We never read or see any of the answers you provide to questions or partner notes that you input into any text fields, these are only ever seen by you or your partner where you have paired your App.

Only after we have anonymised your activity information (so it can never be used to identify you or anyone else), we may use it in the research we engage in with our academic partners to further scientific understanding of how Paired can help relationships. We explain this more in our section on Sharing with our Academic Partners.

Demographic Information

We may present the option for you to provide demographic information so we can provide you with relevant recommendations and tailor the content we provide in the App. Where we do so, we collect: information such as age, gender, preferences, interests, lifestyle information, and where we have your explicit consent information about your sex life and sexual orientation.

Only after we have anonymised your demographic information (so it can never be used to identify you or anyone else), we may use it in the research we engage in with our academic partners to further scientific understanding of how Paired can help relationships. We explain this more in our section on Sharing with our Academic Partners.

Usage Information

When you use the Services, we collect: your responses to surveys so that we may improve the Services we offer; information about the time you spend and the activities you engage with in the App in order to better understand your needs and preferences and improve the user journey and experience; your IP address in order to know your general location so that we can manage the security of our platforms; and your device ID and email address so that we may communicate with you (via email or push notifications) about the activities you undertake as part of Services.

Support Information

When you use the Services, we collect: your email address when you contact us for support so that we are able to respond to you; your device information so that we can understand and fix technical issues that may occur with our platforms, and other personal data you provide about yourself anytime you contact us for support or general queries.

Subscription and Registration Information

When you subscribe to Paired Premium or register for an account, we collect: the details of your applicable subscription, registration information associated with setting up your account which includes an email address and password. We use your registration information to set up your account and to allow you to backup and restore your activity information.

Marketing Information

When you use the Services, we collect your email address so that we can deliver offers and promotions that may be of interest to you. We may use personal data to market our own products and services, which includes sending you information about Paired updates and features, our newsletter, and discounts on Paired Premium. We may combine your data with data we receive from our advertising partners to send you personalised marketing communications based on criteria, including your interactions with our content, items you view in the app, information you give us about yourself in your profile.

Technology Information

When you use our Services, we collect and store certain information via the use of technologies such as device identifiers, pixels and cookies (as further explained in our [Cookie Policy](#)). These technologies track information about you and enable us to: (i) remember you when using your computer or device so that we can personalise your user journey and (ii) advertise our Services to you and other relevant audiences. Where we require your consent for these activities, soliciting your consent will be included as part of the information provided in our cookie banner or notice that is displayed when you first access our Services or when we first engage in these activities.

4. Our lawful bases for the use of your personal data

Our references to “lawful bases” are explained below, and we set out the lawful bases for each category of information that we collect from you.

In addition to the lawful bases explained, when we need to process your sensitive personal data to provide our Services, such as information about your sex life or sexual orientation, we will seek your consent. You will always be able to withdraw your consent at any time and we will promptly stop using any personal data that requires your consent.

Performance of a Contract with you

When we refer to performance of a contract with you as a legal basis, we refer to those circumstances where we need to use your personal data to comply with our contractual obligations to deliver the services you have engaged us to provide.

Legitimate Interest

When we refer to legitimate interest as a legal basis, we refer to those interests we have in running our business, developing our products and services, delivering and improving our products and services, and ensuring an excellent customer experience in a way which may reasonably be expected and don't infringe on your rights and freedoms.

Identity Information

Legitimate interest

Personal Information (username, profile photo, etc.)

Legitimate interest

Activity Information

Legitimate interest

Demographic Information

Consent in relation to data about your sex life or sexual orientation

Usage Information

Legitimate interest

Support Information

Legitimate interest

Subscription and Registration Information

(a) Performance of a contract with you where you have paid for certain services and/or signed up for an account

(b) Legitimate interest

Marketing Information

Legitimate interest

Technology Information

Legitimate interest

5. Information sharing you control

When your App is paired

We do not share your personal data with your partner but provide you with the ability to initiate this sharing. When you pair your instance of the App with your partner's instance of the App, you will be exercising your control to share your name and conversations with your partner. While your App is paired, all your conversations will be available for your partner to view until you choose to end the pairing or by deleting your account.

6. Sharing personal data with Service Providers and other Organisations

We never disclose your personal data to advertisers or other third parties for any compensation. However, we share the personal data we collect about you in order to provide our services in the ways described below.

Service Providers

We work with Service Providers that carry out certain functions on our behalf. These include, for example, companies that help us with network and technology services, payment processing, storing data, analysing data, managing mailing campaigns, running our support desk, and managing subscriptions. We only share personal data that enable our Service Providers to provide their services.

Sharing personal data with other Organisations

We may share personal data with other organisations in the following circumstances:

- if the law or a public authority says we must share the personal data;
- if we need to share personal data in order to establish, exercise or defend our legal rights (this includes providing personal data to our professional advisors); or
- to an organisation we sell or transfer (or enter into negotiations to sell or transfer) any of our businesses or any of our rights or obligations under any agreement we may have with you. If the transfer or sale goes ahead, the organisation receiving your personal data can use your personal data in the same way as us.

7. Sharing with our Academic Partners

We partner with academic institutions such as universities to further scientific understanding of how Paired can help relationships. To do this, we generate anonymised information (so you or anyone else can never be identified) from your use of the App, and we share this information with our academic partners so they may analyse it and publish academic papers on how using Paired impacts relationships.

8. How we Protect Your Information and Where we Store it

Paired has physical, electronic, and procedural safeguards that comply with regulations to protect personal information about you. We also ensure that all of our Service Providers have in place industry recognised safeguards. However, data transmissions over the internet cannot be guaranteed to be 100% secure. Consequently, Paired cannot ensure or warrant the security of information you over the internet to us.

The personal data we collect may be stored and processed on computers situated outside the United Kingdom or the European Economic Area ("EEA"). If such a transfer or storage outside of the UK or EEA was to happen, this would only be done subject to the implementation of adequate contractual safeguards (e.g., the EU's Standard Contractual Clauses)..

Paired limits access to personal information about you to employees who Paired reasonably believes need to come into contact with that information, to provide products or the Service to you, or in order to do their jobs.

9. How long we use personal data for

Your personal data won't be kept longer than necessary, giving due regard to: initial purpose of collection; age of data; any legal/regulatory reason for us to keep it; and whether needed

to protect you or us. If requested, we will readily make information available about our data retention policy.

10. Your Data Protection Rights

Below, we set out the rights you have under the GDPR in relation to your personal data. Should you wish to exercise any of these rights, please write to us using the information provided under the “How to contact us” section of this Policy.

Subject Access Rights -- You have a right to see the personal data we hold about you and the circumstances of our processing activities.

Right to have inaccurate information corrected -- if you believe we hold inaccurate or missing information, please let us know and we will correct it.

Right to object to our use of your personal data -- We will consider your objection to our use of your personal data. If on balance, your rights outweigh our interests in using your personal data, then we will at your request either restrict our use of it or delete it.

Right to object to direct marketing – where we engage in direct marketing activities (after getting your consent), if you make such an objection, we will stop using your personal data for direct marketing purposes.

Right to restrict our use of your personal data -- you can restrict our use of your personal data, if you have successfully made a general objection, you are challenging the accuracy of the personal data we hold, or we have used your personal data unlawfully -- but you do not want us to delete it.

Right to have your personal data deleted -- you can have us delete your personal data when: we no longer need to keep your personal data; you have successfully made a general objection; you have withdrawn your consent to us using your personal data (where we have relied on consent as the lawful basis for doing so); or we have unlawfully processed your personal data

Right to complain to the data protection regulator -- We'd like the chance to resolve any complaints you have, however you also have the right to complain to the data protection regulator in the UK or EEA country where you receive our product about our use of your personal data. In the UK, the data protection regulator is the ICO and their website is at <https://ico.org.uk>.

11. Children's data

Paired does not knowingly collect Personal Data from children. Should we become aware that we are processing the personal data of any children, we will delete such personal data as soon as possible.

12. International Privacy Laws

This Policy complements and does not replace national data protection laws. Any applicable national data protection law will supersede this Policy where such law imposes stronger requirements and this policy shall apply where there are no national data protection laws.

13. How to contact us

If you have any questions about how we collect, store and use personal data or to exercise any of your rights set out above, please email us at luvapp69@gmail.com.