

## # MOBILE APP PRIVACY POLICY

The HUBBOX mobile application is owned and operated by HUBBOX, who are the controller of all stored data.

PepperHQ Ltd operate as a processor of data for the HUBBOX App.

This policy, together with our MOBILE APP TERMS OF USE, explain how we may use information we collect about you, as well as your rights over any personal information we hold about you. Please read this policy and our MOBILE TERMS OF USE carefully.

### ## Information we collect about you through the HUBBOX App.

We collect information about you when you:

- register to use the HUBBOX App;
- attempt to check in to one of our stores;
- register your debit or credit card details;
- upload a profile photo, and
- use the payments facility in the HUBBOX App to pay for your purchase.

This information is collected, stored and processed under Article 6(1)(b) of the GDPR, "processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract" i.e. We need this data for you to be able to use the App for its primary purposes.

### ## Using your information

Collecting personal information in the HUBBOX App (name, email address, date of birth) helps us to better understand what you need from us.

We use your information to:

- improve the functionality and performance of the HUBBOX App;
- personalise our services to you;
- tell you about important changes to the HUBBOX App and related services, and
- manage promotions, competitions, customer surveys and questionnaires.

Your personal information is safe with us and will never be released to third party companies for marketing purposes.

The HUBBOX App captures your geographic location when you attempt to "check in" to one of our stores. We do this to identify which store you are in or near to allow you to pay using the HUBBOX App, and to provide an enhanced visitor experience (for example, through digital loyalty cards). We will only capture this information with your consent. The HUBBOX App also captures basic usage metrics to help us identify any problems and to make improvements in the future. These metrics also help us understand how people use the HUBBOX App and how many people use the different functions within the HUBBOX App.

Your contact details and personal information may be used to send direct marketing messages to you via your contact details provided. This is done only with your explicit consent, which can be withdrawn at any time from the 'MyAccount' options within the app. You may refuse consent for marketing messages without detriment to any other areas of functionality within the app.

## # Information We Capture

### ### Geographic location

We provide enhanced store visit experiences when you choose to "check in" to one of our stores and allow you to pay using the HUBBOX App. You may prevent the HUBBOX App from accessing your device's location services, or turn off the location services of your Mobile Device. Doing so will impact the capability of the HUBBOX App and prevent you from enjoying an enhanced experience.

### ### Data you share with us (Including information you give us when signing up, and information which is shared automatically, such as Device ID, and IP address)

We use this data to log you in to the HUBBOX App and it helps us understand our customers better and present you with appropriate offers and promotions Your data is stored in an encrypted database and transferred over a secure network connection. You decide which data you do and do not share with us. If you ask us to, we will update, correct or delete any data which you give to us.

### ### Data you share with us if you log on through Facebook (Including your gender, date of birth, profile photo)

We use this data to log you in to the HUBBOX App, and it helps us understand our customers better and potentially present you with offers and promotions Your data is stored in an encrypted database and transferred over a secure network connection You decide which data you do and do not share with us. If you ask us to, we will update, correct or delete any data which you give to us.

### ### Your Card details

Your card details are not stored on the HUBBOX App and they are only used in accordance with your top-up instructions. Your card details are stored with our payment gateway partner - Judo Pay - who

are a Level 1 certified PCI-DSS Service Provider. You do not have to use the payments facility within the HUBBOX App to pay for your purchase

### ### Your profile photo

Your profile photo is used in store to verify your identity. If you ask us to, we will update, correct or delete your profile photo. However, you must have a profile photo if you wish to use the HUBBOX App to pay for your purchases in-store.

### ### Your purchase history

We use your purchase history to provide personalised offers and analyse which products and rewards are most likely to interest you.

## ## Data storage, protection and your right to access and erasure

Your data is stored in an encrypted database and transferred over secure network connections. We will store your information for as long as your account exists in the HUBBOX App. If your user account is entirely inactive for a period of 12 months or more, we will delete your account. If you ask us to, or if you delete your account, we will delete the information linked to your account which can identify you personally, including your profile photo and personal details.

You may ask us, at any time, to provide to you confirmation that your data is being processed and access to your personal data. This will generally be provided within 7-21 working days.

## ## Marketing and research

If you agree, we may contact you:

- with offers and information about HUBBOX products or services.
- for customer research, e.g. to help improve our service.

You can ask us to stop contacting you for marketing and/or research purposes by following the instructions in any such communication or by emailing us at [info@hubbox.co.uk](mailto:info@hubbox.co.uk).

## ## Disclosing your information

We will never disclose your information to anyone outside of HUBBOX except:

- Where we have your consent
- Where we are required or permitted to do so by law
- To other companies who provide a service to us as a processor under the terms of this privacy policy

- To any successors in title to our business.

If we ever transfer your personal information to countries outside the European Economic Area we will ensure that appropriate security measures are taken.

### ## Accessing your information

To obtain a copy of the information we hold about you, email us at [info@hubbox.co.uk](mailto:info@hubbox.co.uk). Please confirm any details to help us identify and locate your information. If any of the details are incorrect, let us know and we will amend them.

### ## Changes to our policy

This policy replaces all previous versions and is correct as of May 2018. We reserve the right to change the policy at any time.

### ## Contacting us

If you have any queries, please contact us at [info@hubbox.co.uk](mailto:info@hubbox.co.uk)