

## **PRIVACY POLICY:**

By entering into the Membership Agreement with Webloyalty International SARL ("WL"), you will become a Member of the Shop Appi Webloyalty Programme ("Webloyalty Programme"). As a Member of the Webloyalty Programme WL grants you the right to participate in the Webloyalty Programme, which includes the right to earn cashbacks, and to earn or receive other benefits. Collectively, the grant of the right to participate in the Webloyalty Programme and the right to earn and receive cashbacks and other benefits is referred to as the Webloyalty Membership Service ("Webloyalty Membership Service").

**Please read this Privacy Policy carefully before joining the Webloyalty Programme, using this App or using the [www.shopappi.co.uk](http://www.shopappi.co.uk) website.**

### **Effective Date:**

May 1<sup>st</sup>, 2017

### **Revision Date**

This Privacy Policy was last modified on May 1<sup>st</sup>, 2017.

This is the WL privacy policy (the "Privacy Policy"). which discloses the privacy practices for the Webloyalty Programme, the Webloyalty Membership Service, the Website and Shop Appi Application (the "App") (which may be amended from time to time in accordance with the Changes to this Privacy Policy section below). The Webloyalty Membership Service, App and Website are owned and operated by WL. WL is a limited company registered in Switzerland, with registered number CHE-344.043.246, and its registered office is at 23 route de Crassier (Business Park Terre Bonne, Bâtiment A3), 1262 Eysins, Switzerland. This Privacy Policy applies to access and use of the Website as WL uses the Website to provide general information to Members regarding the App, FAQs and Customer Service information... If you have any questions about this Privacy Policy, please feel free to contact WL at [customerservice@shopappi.co.uk](mailto:customerservice@shopappi.co.uk) or write to WL at 23 route de Crassier (Business Park Terre Bonne, Bâtiment A3), 1262 Eysins, Switzerland.

### **Purpose of this Privacy Policy**

To become a member of the Webloyalty Programme, you must sign up on the App and agree to the [Terms of Service](#). You also must be at least 18 years old and a resident of the United Kingdom. WL recognises the importance of protecting the personally identifiable information such as your full name, telephone number and e-mail and mailing address ("Personal Information") you provide to WL.

This Privacy Policy explains: (a) what sort of Personal Information WL collects; (b) how that Personal Information is used; (c) to whom WL may disclose your Personal Information; (d) how you can correct or change the Personal Information WL holds about you and (e) how you can change your preferences to opt-out of marketing communications (push-notifications).marketing related push notification

This Privacy Policy is incorporated into, and forms part of, the Membership [Terms of Service](#), which govern your participation in the Webloyalty Programme and your use of the Webloyalty Membership Service, the App and the Website.

### **What Information We Collect and How it is Collected Membership**

To become a Member of the Webloyalty Programme, you will be asked to provide a basic profile about yourself by filling out a registration form with your name, mailing address, email address, payment information (including credit and/or debit card number and expiration date) and bank details for the deposit of your cashback benefits). WL processes such information in accordance with this Privacy Policy. The marketing

partners of WL may have different privacy practices and you are encouraged to read their privacy policies.

After joining the Webloyalty Programme, WL may request that you verify your Personal Information previously provided, provide additional contact information (your telephone number, for instance), indicate your communication preferences and create your permanent member identification and password for secure use of the App and Website. You may also be required to select a challenge question and provide the answer so that WL can assist you if you forget your member identification or password. Any data requested helps WL to provide you with your benefits, and to personalise and properly service your Membership.

Depending on the benefits that you elect to use, you may be asked for additional information to properly service your Membership. For those benefits that require you to claim your reimbursements through the completion of a form within the application, depending on the type of claim and the circumstances surrounding the claim, you may be contacted by Customer Services and/or required to provide additional documentation to support your claim.

#### Surveys

From time-to-time WL may provide you as a Member of the Webloyalty Programme the opportunity to participate in contests or surveys made available through the App. If you participate, WL will request certain Personal Information from you. Participation in these surveys or contests is voluntary. The requested information typically includes contact information (such as name, email and/or mailing address) and demographic information. WL may use this information to publish contest winners, to monitor App and/or Website traffic or personalise the Webloyalty Membership Service (in the case of anonymous information collected in surveys). WL may use a third party service provider to conduct these surveys or contests; that company will be prohibited from using your Personal Information for any other purpose. WL will not share the Personal Information that you provide through a contest or survey with any other third parties unless you so consent or as otherwise provided in this Privacy Policy.

#### Cookies and Logfiles

This section of the Privacy Policy sets out how WL uses cookies and similar technologies ("cookies") on and in connection with the Website. Cookies are text files containing small amounts of information which are downloaded by your internet browser and stored on your PC or other device when you visit the Website.

#### How WL uses information WL collects through cookies

WL stores information that WL collects through cookies, log files, clear gifs, and/or third party sources to create a summary of your preferences. WL ties your personally identifiable information, and/or your Membership usage history in order to provide tailored promotions and marketing offers, to improve the content of the App for you and/or to determine your preferences. WL may match information collected from you through different means or at different times, including, for example, information collected online and offline, and use such information along with information obtained from other sources, including third parties. To do this, it is often necessary to share this information with carefully selected vendors and business partners WL works with, such as companies that perform marketing services and other business operations for WL.

#### More information about cookies

WL use session and persistent cookies on the Website. A session ID cookie expires when you close your browser. A persistent cookie remains on your hard drive for an extended period of time.

You can remove persistent cookies and reject persistent and session cookies by following the directions provided in your Internet browser's "help" file or by visiting [www.allaboutcookies.org](http://www.allaboutcookies.org). If you reject persistent or session cookies, you may still use the Website, but you may not be able to access all the Website's functionality or your access may be limited.

#### How WL uses cookies

WL uses cookies to:

(a) remember choices you have made and personalise your use of the App. This includes cookies that:

1. store your password(s) for and keep you logged into the App so that you don't have to enter passwords more than once per visit; and
2. remember and recognise you on subsequent visits to the App,

(b) identify how you use the App, including tracking how you use the App, such as information on where you came from, what content you viewed on the App, and the duration of your visit; and

(c) deliver content and advertising more relevant to you and your interests. This allows WL to serve you more relevant content and advertising when you use the Website and the Webloyalty Membership Service and not to serve you content or offers you may already have opted-out of. This includes cookies used by advertising networks, which may be subject to a separate privacy policy on how the advertising network uses information they collect. Please see the "How WL uses third party cookies for advertising and re-targeting purposes" below for further information. WL links the information obtained from the cookies to any Personal Information that we gather about our Members (see "How WL uses information WL collects through Cookies" above).

#### How WL uses third-party cookies for advertising and re-targeting purposes

WL may also use cookies to enable the use of advertising technology to serve you advertisements that WL feels may be relevant to you when you visit search engines, the Website and/or third party websites upon which WL advertises.

This technology uses information about your previous visits to the Website and the third party websites upon which WL advertises to tailor advertising to you. In the course of serving these advertisements, a unique third-party cookie may be placed or recognised on your browser to enable WL to recognise you. This App and the Website also use Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies to help analyse how visitors use the App. Information about your use of the Website will be transmitted to and stored by Google on servers in the US, and Google will use this information to evaluate your use of the Website, compile reports on Website activity for WL, and provide other services relating to Website activity and internet usage, but will not associate your IP address with any other data held by Google. For more information on the use of Google Analytics, including how to opt out, visit <http://www.google.co.uk/intl/en/analytics/privacyoverview.html>. In addition, the App will use iTunes Analytics which track information regarding application usage within the App. For more information, please visit: <https://itunesconnect.apple.com>. Shop Appi may also use other 3<sup>rd</sup> party tracking tools to track application analytics to evaluate usage.

### Web Beacons

WL uses web beacons, provided by WL's ad serving partner, to help manage the online advertising of WL. These web beacons allow WL and/or its ad serving partner to access individual cookies when a browser visits the Website. This allows WL to identify which advertisements or listings served by its ad serving partner bring users to the Website.

Web beacons are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of the users of the Website. In contrast to cookies, which are stored on a user's computer hard drive, clear gifs are embedded invisibly on the Website and are about the size of the period at the end of this sentence. WL links the information gathered by clear gifs to the Personal Information WL gathers about its Members (see How we use information we collect through Cookies above).

### Logfiles

Like many websites, WL gathers certain information relating to use of the Website automatically and store it in log files. This information includes internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp and clickstream data. WL uses this information, which does not by itself identify individual users, to analyse trends, to administer the Website, to track users' movements around the Website and to gather demographic information about the user base as a whole. After collection, during the processing of the data, WL links this automatically-collected data to the Personal Information that WL holds.

### Customer experience analytics services

In order to analyse the behaviour of the visitors on our Website, we are likely to use some customer experience analytics service. Through these technology, we do not collect or transfer any personal identifiable information, using them only to record, on a completely anonymous basis, information such as mouse clicks, mouse movements, scrolling activity as well as non-Personally Identifiable Information text you type in the Website.

### How Personally Identifiable Information is Used and Disclosed Usage

WL only processes Personal Information for the purposes described in this Privacy Policy (including as set out in the Cookies and Logfiles section above) for the following purposes:

- to identify you as a Member of the Webloyalty Programme;
- to provide the Webloyalty Membership Service and benefits that you request, and to communicate with you in that regard(including sending you emails related to the Webloyalty Membership Service and for billing purposes);
- to ensure the proper functioning of the App and Website;

- to meet research and product/service development needs and to improve the App, Website and the Webloyalty Membership Service; and
- to personalise your experience, including targeting the App, and the Webloyalty Membership Service to you.

#### Marketing Data from Third Parties

WL may combine the information you submit under your account with other information made available to WL or third parties, including information WL receives from its marketing partners, and/or its benefits suppliers to better target the advertising and to improve the quality of the Webloyalty Membership Service.

#### User Communications

When you communicate with WL (by telephone, email or otherwise), WL may record and/or retain those communications to be able to process enquiries, respond to your requests and improve the Webloyalty Membership Service.

#### Disclosure

WL may disclose your Personal Information:

- to WL's group companies, suppliers and service providers, to enable WL to provide the Webloyalty Membership Service to you, including WL's benefit suppliers, to third parties who process payments to or from you on behalf of WL, hosting companies, content providers and software and/or hardware vendors who may have access to WL's databases.
- to the marketing partner that provided you with details of WL's offer to enable them to track the offer that you accepted from WL, and to enable them to undertake market research and data analysis in relation to, but not limited to, your shopping trends and behaviours. Data shared with the marketing partner may include name, address, email address, details on purchasing patterns and/or the status of your Membership, and will not be used for promotional or marketing purposes, and will not be disclosed by them to third parties, other than for the purposes stated above, who have undertaken in a binding agreement to process and maintain the confidentiality of your data in line with applicable law.

WL requires that its marketing partners and suppliers agree to process your Personal Information in accordance with instructions from WL, this Privacy Policy and any other appropriate confidentiality and security measures. These types of third parties are not permitted to use your information for any secondary purposes.

WL may also disclose your Personal Information to government, regulatory and law enforcement agencies to the extent disclosure is required or authorised by law and otherwise as WL believes is necessary or appropriate to satisfy any law, regulation or other governmental request, to operate the App and/or Website properly, or to protect or defend the rights of WL or the rights or well-being of WL's employees, users or others and/or if you are involved (or are suspected of being involved) in any illegal activity (even without a subpoena, warrant or court order).

WL may transfer your information to third parties as a result of or in connection with a sale, merger, consolidation, transfer of assets, reorganisation or liquidation, and WL shall notify you of any such activity if your Personal Information becomes subject to a different privacy policy.

WL may disclose certain information about you such as first name, first initial of last name and city/town of residence publicly as an example of representative savings and/or to identify you as a Member of the Webloyalty Programme.

As part of the Service, we may use the services of financial institutions or bank's subcontractors, subject to legal reporting requirements. In such circumstances these financial institutions or bank's subcontractors may carry out identity checks before any financial transaction is processed. Any information, which is processed by way of transfer to said financial institutions or bank's subcontractors, is intended for their use only and for this specified purpose only.

As a result, we may ask you to provide us with a copy of your proof of identity (ID/passport) as well as some additional information such as date and place of birth, address and phone number.

We inform you that your failure or refusal to provide the information requested will prevent us from providing the benefits of the membership and may result in the termination of your membership. There may also be some delay to us commencing delivering of your benefits to you as a result of these checks.

#### Choice

##### Opting Out

You can make choices about how your Personal Information may be shared by WL with third parties for marketing purposes and/or how your Personal Information may be used by WL for purposes not related to your Membership. WL & the Apple Store enable Members to opt out of receiving marketing notifications on their mobile device. If you opt out of receiving WL marketing communications you will no longer receive these from us. If you elect to opt out, such election will not apply to communications that are directly related to your Membership, the Webloyalty Membership Service and the benefits and/or the fulfilment of a specific transaction you have requested (for example, a claim submitted for a specific benefit and/or emails describing the benefits of the Webloyalty Membership Service or special Member offers; (b) shall not preclude WL, including its employees, contractors, agents and other representatives, from accessing and viewing your Personal Information to provide benefits, to provide support and for any other purpose relating to your Membership of the Webloyalty Programme and (c) shall not preclude WL from disclosing your Personal Information as described in this Privacy Policy for purposes other than sending you promotional and marketing materials not related to your Membership. While you may opt out of push-notifications, you may still periodically receive in-app promotional messages within the application about special promotions or events.

In addition, WL & the Apple Store enable Members to opt out of geo-fencing that will provide notifications when the Member is close to a participating retailer with which the Member could potentially use their in-store cashback rewards. There is no obligation on the part of the Member to opt into this service & is completely at the discretion of the Member and in accordance with Apple Store policies.

#### Links to Third Party Sites

The App may contain links or references to third party websites and the privacy policies of these websites may differ from this Privacy Policy. Please be aware that WL has no control over such websites (other than those controlled by WL's group companies) and this Privacy Policy does not apply to such websites. We encourage you to read the privacy policies of such websites.

#### How WL Protects the Security of Personal Information

The security of your Personal Information is an important concern to WL. WL takes appropriate measures to protect against unauthorised access to or loss, misuse, disclosure, alteration or destruction of Personal Information. WL implements generally accepted standards of technology security including firewalls and Secure Socket Layer (SSL) encryption when storing sensitive Personal Information and billing information. In addition, for any Personal Information you submit to WL through the App and/or Website, such Personal Information shall be transmitted to WL using SSL encryption.

Unfortunately, "perfect security" does not exist on the Internet, and no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while WL strives to protect your information, it cannot be guaranteed that any information stored on WL's servers, or transmitted to or from a user, will be free from unauthorised access and you agree not to hold WL responsible for any breach of security except as set out in the Membership Terms of Service. In addition, unencrypted e-mail is not a "secure" means of communicating with WL, since e-mail may be intercepted by a third party in the course of its delivery.

You are responsible for maintaining the strict confidentiality of your Membership password, and you shall be responsible for any access to or use of the App and Website or the Webloyalty Membership Service by you or any person or entity using a password provided to you, whether or not such access or use has been authorised by or on behalf of you, and whether or not such person or entity is your employee, relative or agent. You agree to (a) immediately notify WL of any unauthorised use of your password, membership number, or any other breach of security, and (b) ensure that you exit from your account at the end of each session. It is your sole responsibility to control the dissemination and use of your password, control access to and use of your account and membership number, and notify WL when you desire to cancel your Membership.

#### Children's privacy

Protecting the privacy of children is very important to WL. Membership of the Webloyalty Programme is not open to anyone under 18 years of age. WL does not collect or maintain Personal Information from people whom WL knows are under 18 years of age. To prevent the collection of information from people under 18 years of age, WL requires valid credit card information to sign up to the Webloyalty Programme.

#### How to update your Personal Information

WL takes reasonable steps to ensure that the Personal Information it collects and processes is accurate, complete and current, but WL depends on its Members to correct or keep up to date their Personal Information. When returning to your Account section within the App, you can review and update your Personal Information. You may also change your password, but you will need to confirm your identity first. Any change to your "Member Profile" on the App will be recapped in an e-mail that is automatically sent out by WL to the e-mail address on file and as a notification in the App. .

#### Compliance Issues

WL has appointed a representative responsible for privacy matters. If you believe your Personal Information has been used in a way that is not consistent with this Privacy Policy or your specified preferences, or if you have further questions related to this policy, please contact the General Counsel by email at [privacy@webloyalty.co.uk](mailto:privacy@webloyalty.co.uk). Written inquiries may be addressed to General Counsel, Webloyalty.com, Inc., **Charter Court, 50 Windsor Road, Slough, Berkshire SL1 2EJ**. We will respond to your inquiry within thirty days.

#### Changes to this Privacy Policy

WL reserves the right to modify this Privacy Policy at any time, so please review it frequently on the App or Website. If WL makes any changes, you will either be notified by email or WL will send you a notification on the App. WL encourage you to read any revised Privacy Policy.

If WL is going to use your personal information in a manner different from that stated at the time of collection, you will be notified via email, and you will have a choice as to whether or not WL uses your personal information in this different manner.

#### Your Acceptance of this Privacy Policy

By using the App and/or Website and/or using the Webloyalty Membership Service, you signify your acceptance of this Privacy Policy.