

Monimove Website “PRIVACY POLICY”

Introduction

Monimove Limited respects and is committed to protecting your personal/business and business data. This privacy policy will inform you as to how we look after your data when you logged in our monimove website or download the monimove mobile app (collectively our “**Website**”) (regardless of where you logged in from), or otherwise provide us with any data and tell you about your privacy rights and how the law protects you.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Please also use the **GLOSSARY** to understand the meaning of some of the terms used in this privacy policy.

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1 IMPORTANT INFORMATION AND WHO WE ARE

1.1 Purpose of this privacy policy

- 1.1.1 This privacy policy aims to give you information on how Monimove Limited protect your personal/business data through your use of the Website.
- 1.1.2 The Website is not intended for children and we do not knowingly collect data relating to children.
- 1.1.3 It is important that you read this privacy policy together with any other privacy policy or fair processing notice we may provide on specific occasions when we are protecting your personal/business data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and is not intended to override them.

1.2 Controller

- 1.2.1 **Monimove Limited** (a company incorporated and registered in England and Wales with company number 10779142) (collectively referred to as the “**Company**”, “**we**”, “**us**” or “**our**” in this privacy policy).
- 1.2.2 If you have any questions about this privacy policy, including any requests to exercise your legal rights, please **contact us** using the details set out below.
Name: Monimove Ltd.
Email address: info@monimove.com

1.2.3 You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

1.3 Changes to our privacy policy and your duty to inform us of changes

1.3.1 We keep our privacy policy under regular review. This version was last updated on [30 March 2020].

1.3.2 It is important that the data we hold about you is accurate and current. Please keep us informed if your data changes during your relationship with us.

1.4 Third-party links

1.4.1 Our Website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our Services, we encourage you to read the privacy policy of every website you visit.

2 THE DATA WE COLLECT ABOUT YOU

2.1 Personal/business data, or personal/business information, means any information relating to an identified or identifiable living individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

2.2 We may collect, use, store and transfer different kinds of personal/business data about you which we have grouped together as follows:

2.2.1 **Identity Data** includes [first name, maiden name, last name, username or similar identifier, title, date of birth, gender, and marital status].

2.2.2 **Contact Data** includes [billing address, delivery address, email address and telephone/mobile numbers].

2.2.3 **Financial Data** includes [bank name, account number, IBAN and SWIFT code details].

2.2.4 **Transaction Data** includes [details about payments to and from you and other details of products or services you have purchased or sell through using our website].

2.2.5 **Technical Data** includes [internet protocol (IP) address, your login data, browser type and version, time zone setting and location, language settings, browser plug-in types and versions, operating system and website and other technology on the devices you use to access the Website].

2.2.6 **Profile Data** includes [username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses].

2.2.7 **Usage Data** includes [information about how you use our Website services].

2.2.8 **Communications Data includes** [Received or sent messages through our website tools].

2.3 We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal/business data but is not considered personal/business data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific Website feature. However, if we combine or connect Aggregated Data with your personal/business data so that it can directly or indirectly identify you, we treat the combined data as personal/business data which will be used in accordance with this privacy policy.

2.4 We do not collect any **Special Categories of Personal/business 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 (where used for ID purposes).

2.5 We do not collect any information about criminal convictions and offences.

2.6 If you fail to provide personal/business data

2.6.1 Where we need to collect personal/business data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In that case, we may have to cancel a service you have with us but we will notify you if that is the case at the time.

3 HOW IS YOUR PERSONAL/BUSINESS DATA COLLECTED?

3.1 We use different methods to collect data from and about you including through:

3.1.1 **Direct interactions.** *You may give us your Identity Data, Contact Data, Financial Data, Profile Data and Communications Data by corresponding with us by post, phone, email, filling in forms on our Website, or otherwise.* [This includes personal/business data you provide when you:

3.1.1.1 apply for our services;

3.1.1.2 create an account on our Website;

3.1.1.3 subscribe to our publications;

3.1.1.4 request orders or Performa invoices information to be sent to other member of our website;

3.1.1.5 confirm to us that you would like to be contacted by a third party who may be able to provide you with services;

3.1.1.6 give us feedback or contact us.

3.1.2 **Automated technologies or interactions.** As you interact with our Website, we will automatically collect Technical Data about your equipment, browsing

actions and patterns. We collect this personal/business data by using cookies, and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our [cookies policy](#) for further details.

3.1.3 Third parties or publicly available sources. We may receive personal/business data about you from third parties as set out below:

3.1.3.1 Identity Data, Contact Data, Financial Data and Transaction Data from our providers of technical, payment and delivery services.

3.1.3.2 Technical Data from providers of our Website analytics services and advertising networks.

3.1.3.3 Identity Data and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the European Union.

4 HOW WE USE YOUR PERSONAL/BUSINESS DATA

4.1 We will only use your personal/business data when the law allows us to. Most commonly, we will use your personal/business data in the following circumstances:

4.1.1 Where you have consented to our use of your personal/business data. You have the right to withdraw such consent at any time by 1.2.2.

4.1.2 Where we need to perform the contract we are about to enter into or have entered into with you.

4.1.3 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.

4.1.4 Where we need to comply with a legal or regulatory obligation.

4.2 Generally, we do not rely on consent as a legal basis for processing your personal/business data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by [contact us](#) .

4.3 Purposes for which we will use your personal/business data

4.3.1 We have set out below, in a table format, a description of all the ways we plan to use your personal/business data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

4.3.2 Note that we may process your personal/business data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact us](#) if you need details about the specific legal ground we are relying on to process your personal/business data where more than one ground has been set out in the table below.

<i>Purpose/Activity</i>	<i>Type of data</i>	<i>Lawful basis for processing including basis of legitimate interest</i>
To register you as a new customer or member	(a) Identity (b) Contact	(a) Performance of a contract with you

<p>To process and deliver your order including:</p> <ul style="list-style-type: none"> (a) managing payments, fees and charges (b) collecting and recovering money owed to us 	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications 	<ul style="list-style-type: none"> (a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
<p>To manage our relationship with you which will include:</p> <ul style="list-style-type: none"> (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey 	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Marketing and Communications (d) Profile 	<ul style="list-style-type: none"> (a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated; and to study how customers use our products and/or services.
<p>To administer and protect our business and the Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Technical 	<ul style="list-style-type: none"> (a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
<p>To deliver relevant Website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications 	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our Website, marketing, customer relationships and experiences</p>	<ul style="list-style-type: none"> (a) Technical (b) Usage 	<ul style="list-style-type: none"> (a) Necessary for our legitimate interests (to define types of customers for our products and services, to keep our Website updated and relevant, to develop our business and to inform our marketing strategy)
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Technical 	<ul style="list-style-type: none"> (a) Necessary for our legitimate interests (to develop our

(d) Usage	products/services and
(e) Profile	grow our business)
(f) Marketing and Communications	(b) You have provided your consent

4.4 Marketing

4.4.1 We strive to provide you with choices regarding certain personal/business data uses, particularly around marketing and advertising.

4.5 Promotional offers from us

4.5.1 We may use your Identity Data, Contact Data, Technical Data, Usage Data, Profile Data and Marketing and Communications Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

4.5.2 You will receive marketing communications from us if you have requested information or services from us and you have not opted out of receiving that marketing.

4.6 Third-party marketing

4.6.1 We will get your express opt-in consent before we share your personal/business data with any third party for marketing purposes.

4.7 Opting-out

4.7.1 You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by [contact us](#) at any time.

4.7.2 Where you opt out of receiving these marketing messages, this will not apply to personal/business data provided to us as a result of using the Website.

4.8 Cookies

4.8.1 You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of the Website may become inaccessible or not function properly. For more information about the cookies we use, please see our [cookies policy](#).

4.9 Change of purpose

4.9.1 We will only use your personal/business data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact us](#).

4.9.2 If we need to use your personal/business data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

4.9.3 Please note that we may process your personal/business data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5 DISCLOSURES OF YOUR PERSONAL/BUSINESS DATA

5.1 We may have to share your personal/business data with the parties set out below for the purposes set out in the table in paragraph 4.3.2 above.

5.1.1 Internal Third Parties as set out in the Glossary.

5.1.2 External Third Parties as set out in the Glossary.

5.1.3 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/business data in the same way as set out in this privacy policy.

5.2 We require all third parties to respect the security of your personal/business data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal/business data for their own purposes and only permit them to process your personal/business data for specified purposes and in accordance with our instructions.

6 INTERNATIONAL TRANSFERS

6.1 Some of our External Third Parties are based or process data outside your location so the processing of your personal/business data will involve a transfer of data outside your location.

6.2 Whenever we transfer your personal/business data out of your location, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

6.2.1 We will only transfer your personal/business data to a country that has been deemed to provide an adequate level of protection for personal/business data.

6.2.2 Where we use a service provider, we may use specific contracts which give your personal/business data the same protection.

6.2.3 If we use a service provider based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal/business data shared between Europe and the US.]

6.3 Please **contact us** if you want further information on the specific mechanism used by us when transferring your personal/business data out of your location.

7 DATA SECURITY

7.1 We have put in place appropriate security measures to prevent your personal/business data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal/business data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal/business data on our instructions and they are subject to a duty of confidentiality.

7.2 We have put in place procedures to deal with any suspected personal/business data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8 DATA RETENTION

8.1 How long will you use my personal/business data for?

- 8.1.1 We will only retain your personal/business data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting, or reporting requirements. We may retain your personal/business data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you
- 8.1.2 To determine the appropriate retention period for personal/business data, we consider the amount, nature and sensitivity of the personal/business data, the potential risk of harm from unauthorised use or disclosure of your personal/business data, the purposes for which we process your personal/business data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.
- 8.1.3 By law we have to keep basic information about our customers (including Contact Data, Identity Data, Financial Data and Transaction Data) for six years after they cease being customers for tax purposes.
- 8.1.4 In some circumstances you can ask us to delete your data: see [Request erasure](#) below for further information.
- 8.1.5 In some circumstances we will anonymise your personal/business 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.

9 YOUR LEGAL RIGHTS

- 9.1 Under certain circumstances, you have rights under data protection laws in relation to your personal/business data as set out below:
 - 9.1.1 **Request access** to your personal/business data (commonly known as a "data subject access request"). This enables you to (i) receive a copy of the personal/business data we hold about you; (ii) understand how and why we are using the personal/business data; and (iii) check that we are lawfully processing it.
 - 9.1.2 **Request correction** of the personal/business data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
 - 9.1.3 **Request erasure** of your personal/business data. This enables you to ask us to delete or remove personal/business data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal/business data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal/business data to comply with the law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
 - 9.1.4 Object to processing of your personal/business data where we are relying on a legitimate interest (or those of a third party) and there is something about

your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal/business data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

9.1.5 Request restriction of processing of your personal/business data. This enables you to ask us to suspend the processing of your personal/business data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

9.1.6 Request the transfer of your personal/business data to you or to a third party. We will provide to you, or a third party you have chosen, your personal/business data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

9.1.7 Withdraw consent at any time where we are relying on consent to process your personal/business data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, 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.

9.2 If you wish to exercise any of the rights set out above, please **contact us** .

9.3 No fee usually required

9.3.1 You will not have to pay a fee to access your personal/business data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

9.4 What we may need from you

9.4.1 We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal/business data (or to exercise any of your other rights). This is a security measure to ensure that personal/business data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

9.5 Time limit to respond

9.5.1 We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10 GLOSSARY

10.1 Comply with a legal obligation means processing your personal/business data where it is necessary for compliance with a legal obligation that we are subject to.

10.2 Internal Third Parties means other companies in our corporate group.

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- 10.3 External Third Parties means:
- 10.3.1 Service providers acting as data processors who provide us with cloud computing, analytics, payment, project management, marketing, and hosting services.
 - 10.3.2 Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
 - 10.3.3 Customs and other authorities who require reporting of processing activities in certain circumstances.
- 10.4 **Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal/business data for our legitimate interests. We do not use your personal/business data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [contact us](#).
- 10.5 **Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
