

## **Mazlow Ltd – Mobile Application Privacy Policy**

### **Introduction**

Welcome to Mazlow Ltd's privacy policy.

Mazlow Ltd is a limited company registered in England and Wales, with the company number 11534603 and registered office at 21 Knightsbridge, Belgravia, London, England, SW1X 7LY.

Mazlow Ltd respects your privacy and is committed to protecting your personal data.

This policy, together with Terms and Conditions and Terms of Use, applies to your use of:

- MASLIFE v.1 mobile application software (App) available in the App Store on Google Play Store, once you have downloaded a copy of the App onto your mobile telephone or handheld device (Device).
- Any of the services accessible through the App (Services) that are available on the App Site or other sites of ours (Services Sites), unless the Terms and Conditions states that a separate privacy policy applies to a particular Service, in which case that privacy policy only applies.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. This App is not intended for children 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.

#### **1. IMPORTANT INFORMATION AND WHO WE ARE**

Mazlow Ltd is the controller and is responsible for your personal data (collectively referred to as "Maslife", "we", "us" or "our" in this policy).

We have appointed a data privacy manager. If you have any questions about this privacy policy, please contact them using the details set out below.

#### **Contact details**

If you have any questions about this privacy policy or our privacy practices, please contact our data privacy manager in the following ways:

Full name of legal entity: Mazlow Ltd

Email address: [contact@maslife.com](mailto:contact@maslife.com)

Postal address: 21 Knightsbridge, Belgravia, London, England, SW1X 7LY

Telephone number: 08001694216

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](http://www.ico.org.uk)) or other competent supervisory authority of an EU member state if the App is downloaded outside the UK.

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

We keep our privacy policy under regular review.

This version was last updated on 20/03/2020 It may change and if it does, these changes will be posted on this page and, where appropriate, notified to you by email . The new policy

may be displayed on-screen and you may be required to read and accept 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.

### **Third party links**

Our Sites may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. Please note that these websites and any services that may be accessible through them have their own privacy policies and that we do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites or services, such as Contact and Location Data. Please check these policies before you submit any personal data to these websites or use these services.

## **2. THE DATA WE COLLECT ABOUT YOU**

We may collect, use, store and transfer different kinds of personal data about you as follows:

- Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, gender, proof of address and identity documents.
- Contact Data includes address, email address and telephone numbers.
- Financial Data includes bank account and payment card details.
- Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.
- Device Data includes the type of mobile device you use, a unique device identifier (for example, your Device's IMEI number, the MAC address of the Device's wireless network interface, or the mobile phone number used by the Device), mobile network information, your mobile operating system, the type of mobile browser you use, time zone setting.
- Content Data includes information stored on your Device, including friends' lists, login information, photos, videos or other digital content, check-ins, steps, floors and distance data.
- Profile Data includes your username and password, in-App purchase history, your interests, preferences, feedback and survey responses.
- Usage Data includes details of your use of any of our Apps or your visits to any of Our Sites including, but not limited to, traffic data and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- Location Data includes your current location disclosed by GPS technology.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users

accessing a specific App feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not 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). Nor do we collect any information about criminal convictions and offences.

### 3. HOW IS YOUR PERSONAL DATA COLLECTED?

We will collect and process the following data about you:

- **Information you give us.** This is information (including Identity, Contact, Financial, and Marketing and Communications Data) you consent to giving us about you by filling in forms on the App Site and the Services Sites (together Our Sites), or by corresponding with us (for example, by email or chat). It includes information you provide when you register to use the App Site, download or register an App, subscribe to any of our Services, search for an App or Service, make an in-App purchase, share data via an App's social media functions, enter a competition, promotion or survey, and when you report a problem with an App, our Services, or any of Our Sites. If you contact us, we will keep a record of that correspondence.
- **Information we collect about you and your device.** Each time you visit one of Our Sites or use one of our Apps we will automatically collect personal data including Device, Content and Usage Data. We collect this data using cookies and other similar technologies. Please see our cookie policy <https://maslife.com/maslife-ltd-cookie-policy/> or further details.
- **Location Data.** We also use GPS technology to determine your current location. Some of our location-enabled Services require your personal data for the feature to work. If you wish to use the particular feature, you will be asked to consent to your data being used for this purpose. You can withdraw your consent at any time by disabling Location Data in your settings or contacting us.
- **Information we receive from other sources including third parties and publicly available sources.** We will receive personal data about you from various third parties and public source] as set out below:
  - Device Data from the following parties:
    - analytics providers such as Google based outside the EU;
    - advertising networks ; and
    - search information providers.
  - Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
  - Identity and Contact Data from data brokers or aggregators.
  - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.
- **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.

## **Cookies**

We use cookies to distinguish you from other users of the App, App Site, the distribution platform (App Store or Google Play Store) or Services Sites and to remember your preferences. This helps us to provide you with a good experience when you use the App or browse any of Our Sites and also allows us to improve the App and Our Sites. For detailed information on the cookies we use, the purposes for which we use them and how you can exercise your choices regarding our use of your cookies, see our cookie policy <https://maslife.com/maslife-ltd-cookie-policy/>.

### **4. HOW WE USE YOUR PERSONAL DATA**

We will only use your personal data when the law allows us to do so. We will rely on the following types of lawful basis to process your personal data:

- Where you have consented before the processing. Consent means processing your personal data where you have signified your agreement by a statement or clear opt-in to processing for a specific purpose. Consent will only be valid if it is a freely given, specific, informed and unambiguous indication of what you want. You can withdraw your consent at any time by contacting us.
- Where we need to perform a contract we are about to enter or have entered with you. 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.
- 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. 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 data for our legitimate interests. We do not use your personal 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 contacting us.
- Where we need to comply with a legal or regulatory obligation. Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

We will only send you direct marketing communications by email or text if we have your consent. You have the right to withdraw that consent at any time by contacting us.

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

### **Purposes for which we will use your personal data**

<b>Purpose/activity</b>	<b>Type of data</b>	<b>Lawful basis for processing</b>	<b>Specific Third Parties we will share your Personal Data with</b>
To install the App and register you as a new App user	(a) Identity (b) Contact (c) Financial (d) Device	(a) Your consent (b) Performance of a contract with you (c) Necessary for our legitimate interests (to verify your ID for money laundering or other anti-crime purposes)	(a) Onfido Ltd (b) Prepaid Financial Services Ltd (c) Twilio Inc
To process in-App purchases and deliver Services including:  (a) Verifying your Identity Data  (b) Deliver your prepaid Card and set up your Account/ E-Wallet  (c) Manage your Account/E-Wallet including payments, fees, charges and currency exchange  (d) Collect and recover money owed to us  (e) Deliver webinars to you  (f) Sign you up to the Mazlow community	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Device (f) Marketing and Communications (g) Location	(a) Your consent (b) Performance of a contract with you (c) Necessary for our legitimate interests (to verify your ID for money laundering or other anti-crime purposes and recover debts due to us)	(a) The Currency Cloud Ltd (b) Onfido Ltd (c) Prepaid Financial Services Ltd

<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Notifying you about charges you are responsible for</p> <p>(c) Asking you to leave a review or take a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Financial</p> <p>(d) Profile</p> <p>(e) Marketing and Communications</p>	<p>(a) Your consent</p> <p>(b) Performance of a contract with you</p> <p>(c) Necessary for our legitimate interests (to keep records updated and to analyse how customers use our products/ Services)</p> <p>(d) Necessary to comply with legal obligations (to inform you of any changes to our terms and conditions)</p>	<p>(a) The Currency Cloud Ltd</p> <p>(b) Prepaid Financial Services Ltd</p> <p>(c) Intercom Software UK Limited</p>
<p>To enable you to participate in a prize draw, competition or complete a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Device</p> <p>(d) Profile</p> <p>(e) Marketing and Communications</p>	<p>(a) Your consent</p> <p>(b) Performance of a contract with you</p> <p>(c) Necessary for our legitimate interests (to analyse how customers use our products/Services and to develop them and grow our business)</p>	
<p>To administer and protect our business and this website (including anti-money laundering requirements, troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Device</p>	<p>(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)</p> <p>(b) Necessary to comply with a legal obligation</p>	<p>(a) Onfido Ltd</p>

<p>To deliver content and advertisements to you</p> <p>To make recommendations to you about goods or services which may interest you</p> <p>To measure and analyse the effectiveness of the advertising we serve you</p> <p>To monitor trends so we can improve the App</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Device</p> <p>(d) Content</p> <p>(e) Profile</p> <p>(f) Usage</p> <p>(g) Marketing and Communications</p> <p>(h) Location</p>	<p>(a) Consent</p> <p>(b) Necessary for our legitimate interests (to develop our products/Services and grow our business)</p>	
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## 5. DISCLOSURES OF YOUR PERSONAL DATA

When you consent to providing us with your personal data, we will also ask you for your consent to share your personal data with the third parties set out below for the purposes set out in the table *Purposes for which we will use your personal data*:

### External Third Parties:

- Service providers based in the EEA who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers based in the EEA who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.

**Specific Third Parties.** These third parties are listed in the table *Purposes for which we will use your personal data* above and their Privacy Policies can be found in the links below:

- The Currency Cloud Limited: <https://www.currencycloud.com/legal/privacy/>
- Onfido Ltd: <https://onfido.com/privacy/>
- Prepaid Financial Services Ltd: <https://prepaidfinancialservices.com/en/privacy-policy>
- Intercom Software UK Limited: <https://www.intercom.com/terms-and-policies#privacy>

- Twilio Inc: <https://www.twilio.com/legal/privacy>

**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 policy.

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

## **6. INTERNATIONAL TRANSFERS**

We do not transfer your personal data outside the European Economic Area (EEA).

## **7. DATA SECURITY**

All information you provide to us is stored on our secure servers. Any payment transactions carried out by us or our chosen third-party provider of payment processing services will be encrypted using Secured Sockets Layer technology. Where we have given you (or where you have chosen) a password that enables you to access certain parts of Our Sites, 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 try to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way.

We will collect and store personal data on your Device using application data caches and browser web storage (including HTML5) and other technology.

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 deal with any suspected personal data breach and will notify you and any applicable regulator when we are legally required to do so.

## **8. DATA RETENTION**

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see *Your legal rights* below for further information.

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.

In the event that you do not use the App for a period of 3 years then we will treat the account as expired and your personal data may be deleted.

## **9. YOUR LEGAL RIGHTS**

Under certain circumstances you have the following rights under data protection laws in relation to your personal data. You have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal 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.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal 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 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 data to comply with local 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.
- **Object to processing** of your personal 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 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.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
  - 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 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
  - you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal 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.
- **Withdraw consent at any time** where we are relying on consent to process your personal 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.

You also have the right to ask us not to continue to process your personal data for marketing purposes.

You can exercise any of these rights at any time by contacting us at [contact@maslife.com](mailto:contact@maslife.com).