

## App Privacy Policy

Last Updated: January 7, 2025

This Privacy Policy outlines how we collect, use, and disclose your information when you use our Service. It also describes your privacy rights and how legal regulations protect you. By using our Service, you consent to the practices described in this Privacy Policy.

## 1. Interpretation and Definitions

### Interpretation

Words with capitalized initials have specific meanings as defined in this section, regardless of singular or plural usage.

### Definitions

- **Account:** A unique account created for you to access our Service or its parts.
- **Affiliate:** An entity that controls, is controlled by, or is under common control with a party, where “control” means ownership of at least 50% of voting rights or other management authority.
- **Application:** Refers to *Swapo*, the software provided by the Company.
- **Company:** *WC2 Limited*, located at 71-75 Shelton Street, Covent Garden, London, WC2H 9JQ, United Kingdom (referred to as “the Company,” “We,” “Us,” or “Our”).
- **Country:** United Kingdom.
- **Data Controller:** Under the GDPR, the legal entity determining how and why personal data is processed (i.e., the Company).
- **Device:** Any device capable of accessing the Service, such as a computer, smartphone, or tablet.
- **GDPR:** The EU General Data Protection Regulation.
- **Personal Data:** Information that identifies or can identify an individual (e.g., name, ID number, location, or online identifier).
- **Service:** Refers to the Application.
- **Service Provider:** Any third-party entity processing data on behalf of the Company (also known as Data Processors under GDPR).
- **Usage Data:** Data automatically collected during your use of the Service (e.g., IP address, browser type, time spent on pages).
- **You:** The individual or entity accessing or using the Service (referred to as the “User” or “Data Subject” under GDPR).

## 2. Collecting and Using Your Personal Data

### Types of Data Collected

#### Personal Data

When you use our Service, we may collect personally identifiable information, such as:

- Email address

- First and last name
- Phone number
- Address, including city, state, and postal code
- Usage Data

### **Usage Data**

Automatically collected data includes:

- Your Device's IP address
- Browser type and version
- Pages visited, time spent, and timestamps
- Mobile-specific details, like unique device IDs or Internet browser type

### **Location Data**

With your permission, we may collect location information to enhance your experience. You can manage or revoke this access through your Device settings.

### **Use of Personal Data**

We use your Personal Data for purposes such as:

- **Service Delivery:** Maintaining and improving our Service.
- **Account Management:** Managing your registration and access.
- **Contractual Obligations:** Processing transactions and fulfilling agreements.
- **Communication:** Sending updates, notifications, and promotional content (subject to your preferences).
- **Business Development:** Mergers, acquisitions, or other corporate activities.
- **Analytics:** Understanding usage trends and improving the Service.

## **3. Sharing Your Data**

We may share your data under the following circumstances:

- **With Service Providers:** To facilitate operations (e.g., payment processing).
- **For Business Transfers:** During mergers or asset sales.
- **With Affiliates:** As part of shared corporate infrastructure.
- **With Your Consent:** For purposes you approve.

## **4. Data Retention and Deletion**

We retain your Personal Data only as long as necessary to:

- Fulfill the purposes outlined in this policy.
- Comply with legal obligations.

You may request to delete your data or update your preferences by contacting us or through your account settings.

## **5. International Data Transfers**

Your data may be processed and stored outside your jurisdiction, including countries with different data protection standards. We take steps to ensure your data is handled securely during such transfers.

## **6. Security of Your Data**

While we employ commercially acceptable measures to protect your Personal Data, no system is entirely secure. We recommend practicing caution while sharing sensitive information online.

## **7. Your GDPR Rights**

If you are in the EU, you have rights under the GDPR, including:

- Access, correction, or deletion of your Personal Data.
- Data portability.
- Objection to processing for specific purposes.
- Withdrawal of consent where processing is based on it.

To exercise your rights, contact us at **it@swapo.co.uk**.

## **8. Children's Privacy**

Our Service is not intended for anyone under 13. If we become aware of any such data collection, it will be promptly removed.

## **9. Links to External Websites**

Our Service may contain links to third-party websites. We are not responsible for their privacy practices.

## **10. Changes to This Policy**

We may update this Privacy Policy periodically. Significant changes will be communicated via email or in-app notifications.

### **Contact Us**

For inquiries regarding this Privacy Policy, contact us:

- By email: **it@swapo.co.uk**
- Through our website: <https://www.swapo.co.uk/app-privacy-policy>