

# Volume Holdings Limited Privacy Policy

## 1. Introduction

- 1.1 We are committed to safeguarding the privacy of Loop website visitors, app users, individual customers and customer personnel.
- 1.2 This policy applies where we are acting as a data controller with respect to the personal data of such persons; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 Our IOS application incorporates privacy controls which affect how we will process your personal data. By using the privacy controls, you can specify whether you would like your location shared to your close friends, your friends of friends, whether you would like to receive communications and manage the collection, sharing and publication of your personal data. You can access the privacy controls via both the onboarding process as well as through the settings page.
- 1.4 In this policy, "we", "us" and "our" refer to the Volume Holdings Limited Team. For more information about us, see Section 14.

## 3. The personal data that we collect

- 3.1 In this Section 3 we have set out the general categories of personal data that we process and, in the case of personal data that we did not obtain directly from you, information about the source and specific categories of that data.
- 3.2 We may process data enabling us to get in touch with you ("**contact data**"). The contact data may include your name, email address, telephone number social media account identifiers, close friends and/or friends of friends. The source of the contact data is you or someone who has referred you as a close friend. If you log onto our application or website using a social media account, we will obtain elements of the contact data from the relevant social media account provider.
- 3.3 We may process your user account data. ("**account data**"). The account data may include your account identifier, name, email address, location, account creation and modification dates, close friends, friends of friends, the location of your close friends, your contacts list, your email list, application settings and marketing preferences. The primary source of the account data is you, although some elements of the account data may be generated by data submitted by your close friend or our website. If you log into our website using a social media account, we will obtain elements of the account data from the relevant social media account provider.
- 3.4 We may process information contained in or relating to any communication that you send to us or that we send to you ("**communication data**"). The communication data may include the communication content and metadata associated with the communication. Our application will generate the metadata associated with communications made using **MATTEO/HOSSAM**

- 3.5 We may process data about your use of our landing page, IOS application and services ("**usage data**"). The usage data may include your IP address, geographical location, the geographical location of your close friends, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking arm.
- 3.6 We may process *[identify general category of data]*. [ This data may include *[list specific items of data]*.] [ The source of this data is *[identify source]*.]

#### **4. Purposes of processing and legal bases**

- 4.1 In this Section 4, we have set out the purposes for which we may process personal data and the legal bases of the processing.
- 4.2 **Operations** - We may process your personal data for the purposes of operating our application, the processing and fulfillment of user requests , providing our services, growing our product, and executing the service of connecting your with the friends of your friends as well as keeping in touch with your close friends. The legal basis for this processing is our legitimate interests, namely the proper administration of our application, services and business.
- 4.3 **Publications** - We may process account data for the purposes of publishing such data on our application and elsewhere through our services in accordance with your express instructions. The legal basis for this processing is consent OR our legitimate interests, namely the publication of content in the ordinary course of our operations OR under the guarantee of anonymity.
- 4.4 **Relationships and communications** - We may process contact data, account data, transaction data and/or communication data for the purposes of managing our relationships, communicating with you (excluding communicating for the purposes of direct marketing) by email, SMS, post, fax and/or telephone, providing support services and complaint handling. The legal basis for this processing is our legitimate interests, namely *[communications with our visitors, service users, individual customers and customer personnel, the maintenance of relationships, and the proper administration of our application, services and business.*
- 4.5 **Direct marketing** - We may process contact data, account data and/or transaction data for the purposes of creating, targeting and sending direct marketing communications by email, SMS, post and/or fax and making contact by telephone for marketing-related purposes. The legal basis for this processing is consent.
- 4.6 **Research and analysis** - We may process usage , communication, content and account data for the purposes of researching and analysing the use of our application and services, as well as researching and analyzing other potential interactions with our business. The legal basis for this processing is our legitimate interests, namely monitoring, supporting, improving and securing our applications, services and business generally.

- 4.7 **Record keeping** - We may process your personal data for the purposes of creating and maintaining our databases, back-up copies of our databases and our business records generally. The legal basis for this processing is our legitimate interests, namely ensuring that we have access to all the information we need to properly and efficiently run and develop our product in accordance with this policy.
- 4.8 **Security** - We may process your personal data for the purposes of security and the prevention of fraud and other criminal activity. The legal basis of this processing is our legitimate interests, namely the protection of our products, services and business, and the protection of others.
- 4.9 **Risk management** - We may process your personal data where necessary for the purpose of managing risks and/or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.
- 4.10 **Legal claims** - We may process your personal data where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
- 4.11 **Legal compliance and vital interests** - We may also process your personal data where such processing is necessary for compliance with a legal obligation to which we are subject or in order to protect your vital interests or the vital interests of another natural person.

## **5. Providing your personal data to others**

- 5.1 We may disclose your personal data to other users of the app and professional advisers insofar as we have been provided with your consent or it is reasonably necessary for the purposes of managing risks, obtaining professional advice.
- 5.2 Your personal data will be stored on the servers of our hosting service provider firebase
- 5.3 We may disclose your personal data, anonymized, to potential investors insofar as reasonably necessary for their personal valuations and decisions about the application.
- 5.5 In addition to the specific disclosures of personal data set out in this Section 5, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise, or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

## **6. International transfers of your personal data**

- 6.1 In this Section 6, we provide information about the circumstances in which your personal data may be transferred to countries outside the United Kingdom and the European Economic Area (EEA).
- 6.2 The hosting facilities for our website are situated in the United States. The competent data protection authorities have made an "adequacy decision" with respect to [the data protection laws of each of these countries. Transfers to each of these countries will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the competent data protection authorities.
- 6.3 You acknowledge that personal data that you submit for publication through our website or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

## **7. Retaining and deleting personal data**

- 7.1 This Section 7 sets out our data retention policies and procedures, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 7.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 7.3 We will retain your personal data as follows:
  - (a) contact data will be retained for a minimum period of 3 months following the date of the most recent contact between you and us, and for a maximum period of 1 year following that date;
  - (b) account data will be retained for a minimum period of 3 months following the date of closure of the relevant account, and for a maximum period of 1 year following that date;
  - (c) transaction data will be retained for a minimum period of 3 months following the date of the transaction, and for a maximum period of *1 year* following that date;
  - (d) communication data will be retained for a minimum period of 3 months following the date of the communication in question, and for a maximum period of 1 year following that date;
  - (e) usage data will be retained for 6 months following the date of collection]; and
- 7.4 Notwithstanding the other provisions of this Section 7, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

## **8. Your rights**

- 8.1 In this Section 8, we have listed the rights that you have under data protection law.

8.2 Your principal rights under data protection law are:

- (a) **the right to access** - you can ask for copies of your personal data;
- (b) **the right to rectification** - you can ask us to rectify inaccurate personal data and to complete incomplete personal data;
- (c) **the right to erasure** - you can ask us to erase your personal data;
- (d) **the right to restrict processing** - you can ask us to restrict the processing of your personal data;
- (e) **the right to object to processing** - you can object to the processing of your personal data;
- (f) **the right to data portability** - you can ask that we transfer your personal data to another organisation or to you;
- (g) **the right to complain to a supervisory authority** - you can complain about our processing of your personal data; and
- (h) **the right to withdraw consent** - to the extent that the legal basis of our processing of your personal data is consent, you can withdraw that consent.

8.3 These rights are subject to certain limitations and exceptions. You can learn more about the rights of data subjects by visiting <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>.

8.4 You may exercise any of your rights in relation to your personal data [by written notice to us, using the contact details set out below].

### **13. Amendments**

13.1 We may update this policy from time to time by publishing a new version on our website.

13.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

13.3 We may notify you of significant changes to this policy by email.

### **14. Our details**

14.1 This Application is owned and operated by Volume Holdings Limited.

14.2 We are registered in England and Wales under registration number *[number]*, and our registered office is at 152 Grosvenor Road, SW1V 3JL, Pimlico, Greater London, United Kingdom.

14.3 Our principal place of business is at 152 Grosvenor Road, SW1V 3JL, Pimlico, Greater London, United Kingdom.

14.4 You can contact us:

- (a) by post, to the postal address given above;
- (b) using our website or application contact form;
- (c) by Whatsapp, on +994 77777733; or
- (d) by email, using [namik@loopnetwork.app](mailto:namik@loopnetwork.app) or the email provided on our website and application.

**15. Data protection officer**

- 15.1 Our data protection officer's contact details are: Namik Muduroglu, Co-Founder, [namik@loopnetwork.app](mailto:namik@loopnetwork.app) , SW1V 3JL.