

Policy version: 23/05/2024

Our Platform is provided by Mood Inc. Tech Ltd, a company incorporated in the Republic of Cyprus, registered number HE 444893, with its registered address at Nikou Antoniadi 7, 6021 Larnaca, Cyprus (**'we', 'our' or 'us'**). We are the controller of personal data obtained via our Platform, meaning we are the organisation legally responsible for deciding how and for what purposes it is used.

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share any information relating to you (your **personal data**) in connection with your use of our website. It also explains your rights in relation to your personal data and how to contact us or a relevant regulator in the event you have a complaint.

We collect, use and are responsible for certain personal data about you. When we do so we are subject to the EU General Data Protection Regulation (**EU GDPR**) in relation to goods and services we offer to individuals in the European Economic Area (**EEA**) and all local legislation and regulations (Law 125(I)2018, as subsequently amended).

Given the nature of our Platform, we do not expect to collect the personal data of anyone under 18 years old. If you are aware that any personal data of anyone under 18 years old has been shared with us please let us know so that we can delete that data.

This privacy policy is divided into the following sections:

- What this policy applies to
- Personal data we collect about you
- How your personal data is collected
- How and why we use your personal data
- Marketing
- Who we share your personal data with
- How long your personal data will be kept
- Transferring your personal data out of the EEA
- Cookies and other tracking technologies
- Your rights
- Keeping your personal data secure
- How to complain
- Changes to this privacy policy
- How to contact us
- Do you need extra help?

What this policy applies to

This privacy policy relates to your use of our website only.

Throughout our Platform we may link to other websites owned and operated by certain trusted third parties. Those third-party websites may also gather information about you in accordance with their own separate privacy policies. For privacy information relating to those third-party websites, please consult their privacy policies as appropriate.

Personal data we collect about you

The personal data we collect about you depends on the particular activities carried out through our website. We will collect and use the following personal data about you:

- your name, address and contact information, including email address and telephone number[and company details (as may be applicable);
- information to check and verify your identity, eg date of birth;
- your gender, if you choose to give this to us
- location data
- your billing information, transaction and payment card or other payment method information
- details of any information, feedback or other matters you give to us by phone, email or via social media
- your account details, such as username and login details
- your activities on, and use of, our website

You must provide this personal data in order to be able to use our Platform. Any data that is optional will be clearly indicated as such.

Sometimes you can choose if you want to give us your personal data and let us use it. Where this is the case we will tell you and give you the choice before you give the personal data to us. We will also tell you whether declining to share that personal data will have any effect on efficient use of the Platform.

We collect and use this personal data for the purposes described in the section '**How and why we use your personal data**' below.

How your personal data is collected

We collect personal data from you:

- directly, when you enter or send us information, such as when you *register with us, contact us (including via email), send us feedback, purchase services via our website, post material to our Platform and complete customer surveys or participate in competitions via our website*, and
- indirectly, such as your browsing activity while on our website; we will usually collect information indirectly using the technologies explained in the section on '**Cookies and other tracking technologies**' below

We also collect personal data about you from other sources as follows:

- Other users.

How and why we use your personal data

Under data protection law, we can only use your personal data if we have a proper reason and legal basis:

- where you have given consent
- to comply with our legal and regulatory obligations
- for the performance of a contract with you or to take steps at your request before entering into a contract, or
- for our legitimate interests or those of a third party

A legitimate interest is when we have a business or commercial reason to use your personal data, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own. You can obtain details of this assessment by contacting us (see '**How to contact us**' below).

The table below explains what we use your personal data for and why.

What we use your personal data for	Our reasons
Creating and managing your account with us	To perform our contract with you or to take steps at your request before entering into a contract
Providing services to you	To perform our contract with you or to take steps at your request before entering into a contract
Conducting checks to identify you and verify your identity or to help prevent and detect fraud against you or us	To comply with our legal obligations
Enforcing legal rights or defend or undertake legal proceedings	Depending on the circumstances: —to comply with our legal and regulatory obligations —in other cases, for our legitimate interests, i.e. to protect our business, interests and rights

What we use your personal data for	Our reasons
<p>Customising our website and its content to your particular preferences based on a record of your selected preferences or on your use of our website</p>	<p>Depending on the circumstances:</p> <p>—your consent as gathered [<i>by the separate cookies tool on our website</i>]<i>— see ‘Cookies and other tracking technologies’ below</i></p> <p>—where we are not required to obtain your consent and do not do so, for our legitimate interests, i.e. to be as efficient as we can so we can deliver the best service to you at the best price</p> <p>If you have provided such a consent, you may withdraw it at any time by notifying us at dpo@groovit.io (this will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn)</p>
<p>Retaining and evaluating information on your recent visits to our website and how you move around different sections of our website for analytics purposes to understand how people use our website so that we can make it more intuitive or to check our website is working as intended</p>	<p>Depending on the circumstances:</p> <p>—your consent as gathered <i>by the separate cookies tool on our website - see ‘Cookies and other technologies’ below</i></p> <p>—where we are not required to obtain your consent and do not do so, for our legitimate interests, i.e. to be as efficient as we can so we can deliver the best service to you at the best price</p> <p>If you have provided such a consent, you may withdraw it at any time by by notifying us at dpo@groovit.io (this will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn)</p>
<p>Shared with the third party providers listed below</p>	<p>Your consent as gathered by the separate cookies tool on our website—see ‘Cookies and other tracking technologies’ below</p> <p>If you have provided such a consent, you may withdraw it at any time by by notifying us at dpo@groovit.io (this will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn)</p>

What we use your personal data for	Our reasons
Communications with you not related to marketing, including about changes to our terms or policies or changes to any products AND/OR services or other important notices	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> —to comply with our legal and regulatory obligations —in other cases, for our legitimate interests, i.e., to be as efficient as we can so we can deliver the best service to you at the best value
Protecting the security of systems and data used to provide the services	<p>To comply with our legal and regulatory obligations</p> <p>We may also use your personal data to ensure the security of systems and data to a standard that goes beyond our legal obligations, and in those cases our reasons are for our legitimate interests, i.e. to protect systems and data and to prevent and detect criminal activity that could be damaging for you and/or us</p>
Statistical analysis to help us understand our customer base	For our legitimate interests, i.e. to be as efficient as we can so we can deliver the best service to you at the best price
Updating and enhancing customer records	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> —to perform our contract with you or to take steps at your request before entering into a contract —to comply with our legal and regulatory obligations —where neither of the above apply, for our legitimate interests, e.g. making sure that we can keep in touch with our customers about new services.
Disclosures and other activities necessary to comply with legal and regulatory obligations that apply to our business, e.g. to record and demonstrate evidence of your consents where relevant	To comply with our legal and regulatory obligations
Marketing our services to existing and former customers	<p>For our legitimate interests, i.e. to promote our business to existing and former customers</p> <p>See 'Marketing' below for further information</p>
The audit of the Platform	Depending on the circumstances:

What we use your personal data for	Our reasons
	<p>—to perform our contract with you or to take steps at your request before entering into a contract</p> <p>—to comply with our legal and regulatory obligations</p> <p>—where neither of the above apply, for our legitimate interests, e.g. making sure that we can keep in touch with our customers about new services</p>

How and why we use your personal data—in more detail

More details about how we use your personal data and why are set out in the table below.

Purpose	Processing operation	Lawful basis relied on under the EU GDPR	Relevant categories of personal data
Communications with you not related to marketing, including about changes to our terms or policies or changes to the products or other important notices	Addressing and sending communications to you as required by data protection laws, i.e.: — regulations and legislation applicable in Cyprus, (Law 125(I)2018, as subsequently amended) — the EU GDPR	Processing is necessary for compliance with a legal obligation to which we are subject	—your name, address and contact information, including email address and telephone number [and company details] —your account details (username)
	Addressing and sending communications to you	Processing is necessary for compliance with a legal obligation to which we are subject	
	Addressing and sending communications to you about changes to our terms or policies or changes to the products or other important notices (other than those addressed above)	Our legitimate interests which is to be as efficient as we can so we can deliver the best service to you	—your name, address and contact information, including email address and telephone number [and company details] —your account details (username)

How and why we use your personal data—sharing

See '**Who we share your personal data with**' for further information on the steps we will take to protect your personal data where we need to share it with others.

Marketing

We will use your personal data to send you updates by email about our services, including exclusive offers, promotions or new services.

We have a legitimate interest in using your personal data for marketing purposes (see above '**How and why we use your personal data**'). This means we do not need your consent to send you marketing information. If we change our marketing approach in the future so that consent is needed, we will ask for this separately and clearly.

You have the right to opt out of receiving marketing communications at any time by:

- contacting us at dpo@groovit.io
- using the 'unsubscribe' link in emails
- updating your marketing preferences via your account profile.

We may ask you to confirm or update your marketing preferences if you ask us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

We will always treat your personal data with the utmost respect and never share it with other organisations **our company** for marketing purposes.

For more information on your right to object at any time to your personal data being used for marketing purposes, see '**Your rights**' below.

Who we share your personal data with

We routinely share personal data with:

- third parties we use to help deliver our services to you, e.g. payment service providers etc.
- other third parties we use to help us run our business, e.g. marketing agencies, website hosts and website analytics providers
- our bank[s], accounting, financial and legal advisers

We only allow those organisations to handle your personal data if we are satisfied that they take appropriate measures to protect your personal data. We also impose contractual obligations on them to ensure they can only use your personal data to provide services to us and to you.

We or the third parties mentioned above occasionally also share personal data with:

- our and their external auditors, e.g. in relation to the audit of our or their accounts, in which case the recipient of the information will be bound by confidentiality obligations

- our and their professional advisors (such as lawyers and other advisors), in which case the recipient of the information will be bound by confidentiality obligations
- law enforcement agencies, courts, tribunals and regulatory bodies to comply with our legal and regulatory obligations
- other parties that have or may acquire control or ownership of our business (and our or their professional advisers) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency—usually, information will be anonymised but this may not always be possible. The recipient of any of your personal data will be bound by confidentiality obligations

Who we share your personal data with—in more detail

More details about who we share your personal data with and why are set out in the table below.

Recipient	Processing operation (use) by recipient	Further information
Google Analytics	Groovit websites use Google Analytics which is a widespread and trusted analytics solution for helping us to understand how you use our Platform and ways that we can improve your experience. These cookies may track things such as how long you spend on the site and the pages that you visit.	Learn more about how Google Analytics safeguard your data
Authentication	We use OAuth2 to sign you in to your Groovit account, which helps us to secure our platform and provide you with tailored content. These cookies may track things such as your unique user id.	
Sentry	We use Sentry to report errors on our Platform. Sentry use cookies to help ensure that errors are captured.	View Sentry's privacy policy.
Google Tag Manager	We use Google Tag Manager to manage the Platform's services in a more efficient and safe way.	Read about how Google complies with data protection laws.
Hotjar	We use Hotjar to collect standard internet log information and details of visitor behaviour patterns. We do this to find out	View Hotjar's privacy policy.

Recipient	Processing operation (use) by recipient	Further information
	things such as the number of visitors to the various parts of the site. We collect this information in a way which does not personally identify anyone.	

We will not share your personal data with any other third party.

Who we share your personal data with—further information

If you would like more information about who we share our data with and why, please contact us (see ‘**How to contact us**’ below).

How long your personal data will be kept

We will not keep your personal data for longer than we need it for the purpose for which it is used.

Different retention periods apply for different types of personal data. Further details on this are available [[URL](#)].

If you stop using your account we will delete or anonymise your account data after six years subject to any special circumstances or conditions.

Following the end of the relevant retention period, we will delete or anonymise your personal data.

Transferring your personal data out of the EEA

Countries outside the EEA have differing data protection laws, some of which may provide lower levels of protection of privacy.

It is sometimes necessary for us to transfer your personal data to countries outside the EEA. In those cases we will comply with applicable EEA laws designed to ensure the privacy of your personal data.

We will transfer your personal data to:

- our service providers located outside the EEA.

Under data protection laws, we can only transfer your personal data to a country outside the EEA where:

- the European Commission has decided that the particular country ensures an adequate level of protection of personal data (known as an ‘**adequacy decision**’) further to Article 45 of the EU GDPR. A list of countries the European Commission has currently made adequacy decisions in relation to is available [here](#).
- there are appropriate safeguards in place, together with enforceable rights and effective legal remedies for you, or
- a specific exception applies under relevant data protection law

Where we transfer your personal data outside the EEA we do so on the basis of an adequacy decision or (where this is not available) *legally-approved standard data protection clauses issued further to Article 46(2) of the EU GDPR*. In the event we cannot or choose not to continue to rely on either of those mechanisms at any time we will not transfer your personal data outside the EEA unless we can do so on the basis of an alternative mechanism or exception provided by applicable data protection law and reflected in an update to this policy.

Any changes to the destinations to which we send personal data or in the transfer mechanisms we rely on to transfer personal data internationally will be notified to you in accordance with the section on **'Changes to this privacy policy'** below.

Transferring your personal data out of the EEA—further information

If you would like further information about data transferred outside the EEA, please contact our Data Protection Officer (see **'How to contact us'** below).

Cookies [and other tracking technologies]

A cookie is a small text file which is placed onto your device (for example computer, smartphone or other electronic device) when you use our website. We use cookies and the above-mentioned technologies (in the section *Who we share your personal data with—in more detail*) on our website. These *help us recognise you and your device and store some information about your preferences or past actions*.

For further information on cookies and *of any similar technologies*, our use of *'cookies' and/or relevant similar technologies*, when we will request your consent before placing them and how to disable them, please see our <https://www.groovit.io/cookies-policy>.

Your rights

You generally have the following rights, which you can usually exercise free of charge:

Access to a copy of your personal data	The right to be provided with a copy of your personal data A more detailed explanation of this right law is available here
Correction (also known as rectification)	The right to require us to correct any mistakes in your personal data A more detailed explanation of this right is available here
Erasure (also known as the right to be forgotten)	The right to require us to delete your personal data—in certain situations A more detailed explanation of this right is available here

Restriction of use	<p>The right to require us to restrict use of your personal data in certain circumstances, i.e. if you contest the accuracy of the data</p> <p>A more detailed explanation of this right is available here</p>
Data portability	<p>The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations</p> <p>A more detailed explanation of this right is available here</p>
To object to use	<p>The right to object:</p> <ul style="list-style-type: none"> —at any time to your personal data being used for direct marketing (including profiling) —in certain other situations to our continued use of your personal data, i.e. where we use your personal data for our legitimate interests unless there are compelling legitimate grounds for the processing to continue or the processing is required for the establishment, exercise or defence of legal claims <p>A more detailed explanation of this right is available here</p>
Not to be subject to decisions without human involvement	<p>The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you</p> <p>We do not make any such decisions based on data collected by our website</p> <p>A more detailed explanation of this right is available here</p>
The right to withdraw consents	<p>If you have provided us with a consent to use your personal data you have a right to withdraw that consent easily at any time</p> <p>You may withdraw consents by contacting us at dpo@groovit.io</p>

	Withdrawing a consent will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn
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For further information on each of those rights, including the circumstances in which they do and do not apply, please contact us (see ‘**How to contact us**’ below).

If you would like to exercise any of those rights, please email, call or write to us—see below: ‘**How to contact us**’. When contacting us please:

- provide enough information to identify yourself *full name, address and subscriber or matter reference number*) and any additional identity information we may reasonably request from you,
- complete the relevant form that will be provided to you; and
- let us know which right(s) you want to exercise and the information to which your request relates to

Keeping your personal data secure

We have appropriate security measures to prevent personal data from being accidentally lost or used or accessed unlawfully. We limit access to your personal data to those who have a genuine need to access it.

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

How to complain

Please contact us if you have any queries or concerns about our use of your personal data (see below ‘**How to contact us**’). We hope we will be able to resolve any issues you may have.

You also have the right to lodge a complaint with:

- the Commissioner for the Protection of Personal Data in Cyprus
- The **Commissioner** for the Protection of Personal Data in Cyprus may be contacted using the details https://www.dataprotection.gov.cy/dataprotection/dataprotection.nsf/contact_en/contact_en?opendocument

Changes to this privacy policy

We may change this privacy policy from time to time—when we make significant changes we will take steps to inform you, for example by including a prominent link to a description of those changes on our website for a reasonable period or by other means, such as email.

How to contact us

You can contact us by email or telephone if you have any questions about this privacy policy or the information we hold about you, to exercise a right under data protection law or to make a complaint.

Our contact details are shown below:

Our contact details	Our Data Protection Officer's contact details
Mood Inc. Tech Ltd HE 444893, Nikou Antoniadu 7, 6021 Larnaca, Cyprus	Constantinos Toumbas dpo@groovit.io

Do you need extra help?

If you would like this policy in another format (for example audio, large print, braille) please contact us (see 'How to contact us' above).