

# Togeva Limited

## Privacy and Cookies Policy

Togeva Limited ("we", "our", "us") is committed to protecting and respecting your privacy.

In this privacy policy we explain how we use any personal information we collect about you. By submitting your personal information to us you consent to the use of that information as set out in this policy.

For the purpose of the Data Protection Act 1998 (the Act), the data controller is Togeva Limited, a company registered in England under number 07701172 with its registered office at Enterprise House, 56-58 Main Street, High Bentham, Lancaster, LA2 7HY.

We are registered under the Data Protection Act 1998 and registered with the Information Commissioner's Office, registration reference number: ZA085879.

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### How we collect your information

We collect information about you:

- when you sign up to, participate in, or access any of our games, competitions, activities, services or online content on our website, mobile site or mobile apps (each a "Site" and together the "Sites");
- when you connect with your account with Twitter, Facebook or other social networking site;
- the nature of the device you are using, for example, whether you are accessing the Site from a personal computer or from a mobile device;
- if you contact us, we may keep a record of that correspondence;
- when you visit a Site (see also under Cookies below).

Where you access our Sites through a third party social networking site, such as Facebook or Twitter, we may receive your information (such as your name and email address) direct from the account that you have with them. The information that we receive may depend on the privacy settings you have with the third party site. For their privacy policies, please see for example <https://www.facebook.com/about/privacy> and <https://twitter.com/privacy>.

By using a Site you are giving us permission to use your personal information in the ways set out in this Privacy Policy.

### How we use your information

We use your information to provide our games, competitions, activities, services or online content to you and to support your relationship with us. We use your information collected from a Site to personalise your repeat visits to that Site.

If you are a Facebook or Twitter user, we may also use your information to suggest or connect you to other Facebook or Twitter users or to allow you to post direct to your Facebook or Twitter accounts. Please remember that any item that you share with Facebook will appear on your Facebook timeline and in your Facebook friends' newsfeeds.

Unless you elect to opt-in (e.g. sign up to a specific competition) we will not share your information for marketing purposes with any third party.

We may also use aggregate information and statistics for the purposes of monitoring usage of our Sites in order to help us to develop our Sites. We may also provide such aggregate information to third parties but this will not include any information that could be used to identify you.

We may disclose your personal information to third parties if:

- we sell or buy any business or assets, in which case we may disclose your personal information to the prospective seller or buyer of such business or assets;
- Togeve Limited or substantially all of its assets are acquired by a third party, in which case personal information held by it about its users and customers will be one of the transferred assets;
- we are under a duty to disclose or share your personal information in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of Togeve Limited, our clients, or others.

## **Marketing**

We may contact you by email or text you with information about news, promotions, competitions, offers, events and other information we think may be of interest to you.

You can at any time ask us not to use your personal information for marketing purposes. You can exercise the right at any time by contacting our Privacy Controller at [privacy@togeve.com](mailto:privacy@togeve.com).

## **Security**

Where we have given you a password which enables you to access certain areas of a Site you are responsible for keeping that password confidential and the password should not be shared with anyone.

All personal information you provide to us is stored on secure servers. Some of the data processors we engage to process personal data may be located outside of the European Economic Area (EEA). We will ensure that any transfer outside the EEA is subject to contractual provisions and administrative, technical and physical security measures to protect it from authorised access and use. Please note, however, that whilst we will use all reasonable efforts to safeguard your personal information, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal information which is transferred over the internet.

## **Cookies**

In order to improve the Sites, we may use small files commonly known as "cookies". A cookie is a small amount of data which often includes a unique identifier that is sent to your computer, tablet or mobile phone (referred to in this Privacy Policy as a 'device') from each Site and is stored on your device's hard drive.

A cookie records on your device information relating to your internet activity (such as whether you have visited that Site before). The cookies we use on the Sites won't collect personally identifiable information about you and we won't disclose information stored in cookies that we place on your device to third parties.

How can you control the use of cookies from the Sites?

If you don't want us to use cookies when you use a Site, you can adjust your internet browser settings not to accept cookies. Your web browser's help function should tell you how to do this. Alternatively, you can find information about how to do this for all the commonly used internet browsers on the website: <http://www.aboutcookies.org/default.aspx> This website will also explain how you can delete cookies which are already stored on your device.

We currently set the following cookies:

#### Google Analytics

We use Google Analytics – the web analytics service provided by Google Inc. - in order to understand how visitors to each Site use that Site. The Google Analytics cookies remember you from one page request to the next, for example to differentiate between 'new' and 'returning' visitors. We receive reports from Google Inc. about website usage (such as the number of visitors to each Site or the number of unique page views). Google Analytics cookies do not collect personal information about you.

For more information see:

<http://code.google.com/apis/analytics/docs/concepts/gaConceptsCookies.html>

#### **Links to other websites**

Our Sites may contain links to other websites. This privacy policy only applies to our Sites so when you link to other websites you should read their privacy policies.

#### **Access to information**

The Data Protection Act gives you rights to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £10 to meet our costs in providing you with the details of the information we hold about you.

#### **Changes to this privacy policy**

We reserve the right to change this privacy policy from time to time. Any changes we may make will be posted on this page and, where appropriate, notified to you by email. This privacy policy was last updated on 13 November 2014.

#### **Contact us**

If you have any questions regarding this Privacy Policy, please contact our Privacy Controller at [privacy@togeva.com](mailto:privacy@togeva.com) or write to us at: Togeva, c/o Privacy Controller, Enterprise House, 56-58 Main Street, High Bentham, Lancaster LA2 7HY, United Kingdom.