

## PRIVACY POLICY

### How To Build A Dating App

How To Build A Dating App (**We**) are committed to protecting and respecting your privacy. We are a business division of Never What If Group Limited (**NWIGL**), a limited company incorporated in England with company registration number 09859748. NWIGL is a parent company with several companies within its group operating several businesses.

This policy (together with our terms of use and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. When that happens, we are regulated under the General Data Protection Regulation which applies across the European Union (including in the United Kingdom) and we are responsible as 'controller' of that personal information for the purposes of those laws. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it when you visit [www.howtobuildadatingapp.com](http://www.howtobuildadatingapp.com).

#### OUR WEBSITE

This privacy policy relates to your use of our website, [www.howtobuildadatingapp.com](http://www.howtobuildadatingapp.com) (**our site**) only.

Throughout our website we may link to other websites owned and operated by certain trusted third parties to make additional products and services available to you. These other third party websites may also gather information about you in accordance with their own separate privacy policies. For privacy information relating to these other third party websites, please consult their privacy policies as appropriate.

#### INFORMATION WE MAY COLLECT ABOUT YOU

The personal information we collect about you depends on the particular activities carried out through our website. Such information may include:

- **Information you give us.** You may give us information about you by filling in forms on our site or by corresponding with us by phone, e-mail, social media or otherwise. This includes information you provide when you register to use our site, subscribe to any service offered through our site, search for a product, and when you report a problem with our site.
- **Information we collect about you.** With regard to each of your visits to our site we may automatically collect the following information:
  - technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information,

browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;

- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.
- **Information we receive from other sources.** We may receive information about you if you use any of the other websites we operate or the other services we provide. We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

#### **MONITORING AND RECORDING COMMUNICATIONS**

We may monitor and record communications with you (such as telephone conversations and emails) for the purpose of quality assurance and training.

#### **OUR LEGAL BASIS FOR PROCESSING YOUR PERSONAL INFORMATION**

When we use your personal information, we are required to have a legal basis for doing so. There are various different legal bases upon which we may rely, depending on what personal information we process and why.

The legal bases we may rely on include:

- **consent:** where you have given us clear consent for us to process your personal information for a specific purpose
- **contract:** where our use of your personal information is necessary for a contract, we have with you, or because you have asked us to take specific steps before entering into a contract
- **legal obligation:** where our use of your personal information is necessary for us to comply with the law (not including contractual obligations)
- **legitimate interests:** where our use of your personal information is necessary for our legitimate interests or the legitimate interests of a third party (unless there is a good reason to protect your personal information, which overrides our legitimate interests).

## **COOKIES**

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our [Cookie policy](#).

For further information on cookies generally visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

## **USES MADE OF THE INFORMATION**

We use information held about you in the following ways:

- **Information you give to us.** We will use this information:
  - to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
  - to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
  - to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. If you are an existing customer, we will only contact you by electronic means (e-mail or SMS) with information about services similar to those which were the subject of a previous sale or negotiations of a sale to you. If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please tick the relevant box situated on the form on which we collect your data (the registration form);
  - to notify you about changes to our service;
  - to detect and prevent fraud;
  - to do an identity check (if applicable);
  - to ensure that content from our site is presented in the most effective manner for you and for your computer.
- **Information we collect about you.** We will use this information:

- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
  - to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
  - to allow you to participate in interactive features of our service, when you choose to do so;
  - as part of our efforts to keep our site safe and secure;
  - to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
  - to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.
- **Information we receive from other sources.** We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

#### **DISCLOSURE OF YOUR INFORMATION**

We may disclose your personal information to any member of our group, which means our subsidiaries (meaning any companies of which we own more than 50%), our ultimate holding company (meaning the top company in our corporate structure that controls all the other companies in our group) and its subsidiaries.

We may share your information with selected third parties including:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you.
- Analytics and search engine providers that assist us in the improvement and optimisation of our site.
- Credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.

- If Never What If Group Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data 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 Never What If Group Limited, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

## **MARKETING**

We would like to send you information about products and services, competitions and special offers, which may be of interest to you. Where we have your consent or it is in our legitimate interests to do so, we may do this by post, email, telephone, text message (SMS) or automated call.

We would also like to share your information with selected companies in our group of companies, so that they may send you information about their products and services, depending on what you agree with us.

We will only ask whether you would like us and other companies in our group to send you marketing messages when you tick the relevant boxes when you sign-up for any service for the first time or complete any online order form for the first time.

If you have previously agreed to being contacted in this way, you can unsubscribe at any time by using the 'unsubscribe' link in emails or 'STOP' number in texts.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## **KEEPING YOUR DATA SECURE**

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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.

### **TRANSFERS OF YOUR DATA OUT OF THE EEA**

We may transfer your personal information to the USA in order to host and serve copies of the podcasts and webinars, which is relevant if you have participated in any of our broadcasts. We use a podcast hosting company in the USA, which is registered under the Privacy Shield Framework in the USA - <https://www.privacyshield.gov/welcome>.

The USA does not have the same data protection laws as the United Kingdom and EEA. Whilst the European Commission has not given a formal decision that USA provides an adequate level of data protection similar to those which apply in the United Kingdom and EEA, any transfer of your personal information will be subject to an approved contract (as permitted under Article 46(5) of the General Data Protection Regulation), which is designed to help safeguard your privacy rights and give you remedies in the unlikely event of a misuse of your personal information.

We will not otherwise transfer your personal data outside of the EEA.

### **CHANGES TO OUR PRIVACY POLICY**

Any changes we may make to our privacy policy in the future will be posted on this page. Please check back frequently to see any updates or changes to our privacy policy.

### **CONTACT**

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to [info@howtobuildadatingapp.com](mailto:info@howtobuildadatingapp.com).