

## **WILLOWS – PRIVACY POLICY**

Lincoln Enterprises Ltd TA Willows (hereafter referred to as Willows) mobile application (“App”) is provided by Willows. (‘we’, ‘us’ or ‘our’). We are committed to protecting and respecting the privacy of users of the App (‘you’ or ‘your’). This privacy policy (‘Privacy Policy’) sets out the basis on which the personal data collected from you, or that you provide to us, will be processed by us. Please read the following carefully to understand how we will use your personal data.

For the purpose of data protection legislation in the UK, the data controller is Lincoln Enterprises LTD TA WILLOWS, company registration no. 15214603, registered office 37 Church Street, Basingstoke, Hampshire, England. RG21 7QQ  
Information we may collect and process from you.

We may collect and process the following information from you in accordance with data protection legislation in the UK:

Registration details including name & email.

Information about your use of the app including redemptions and other information that you give us.

Your information may from time to time be analysed to see how much you use the app, to understand your on-app behaviour, and to send you information and offers for the products or services which we feel are most relevant to you about Willows.

We are required to comply with certain legal and regulatory requirements and may process your personal data for compliance with such legal or regulatory obligation, to which we or regulators or law enforcement agencies are subject.

Note that if any of your personal details change during your use of the App, we request that you update them by accessing the relevant section of the App, or by contacting us at [willows.basingstoke@gmail.com](mailto:willows.basingstoke@gmail.com)

### **Retention of your Personal Data**

Willows will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy and will delete data when your profile is deleted. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

Willows will also retain Usage Data for internal analysis purposes only. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

## Security of Data

The security of your data is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

## Use of data

Willows uses the collected data for various purposes:

- To provide and maintain our service and app.
- To notify you about changes to our service
- To allow you to participate in interactive features of our Service when you choose to do so.
- To provide customer support
- To gather analysis or valuable information so that we can improve our service.
- To monitor the usage of our service
- To detect, prevent and address technical issues.

## Cookies and similar technology

Our App and services use cookies or similar technology to collect information about your access to the App and services.

Cookies are pieces of information that include a unique reference code that an app or a website transfers to your device to store and sometimes track information about you. A number of cookies we use last only for the duration of your web session and expire when you close your browser. Other cookies are used to remember you when you return to use our App and services and will last for longer.

We use the following categories of cookies on the App and in the provision of services to you, for the purposes set out below:

### Essential session management cookies

These cookies are essential in order to enable you to use our App and use its features. Without these cookies, services you have asked for, cannot be provided to you. We use these cookies for ensuring you receive information relating to your use of the app.

### Functionality cookies

These cookies allow our App to remember choices or selections you make around functionality features (such as your name or city) and provide enhanced, more personal features. We also use these cookies to remember changes you make to other parts of our App which you may be able to customise from time to time. The information we collect via

these cookies may be anonymised and these cookies cannot track your browsing activity on other websites. We use these cookies for:

Customising elements of the promotional layout and/or content of the pages of the App for example by storing a location and/or country code and providing users with content relevant to their location and/or country.

#### Performance and measurement cookies

These cookies collect information about how visitors use our App and if they get error messages when using the App. These cookies do not collect information that identifies a visitor. All information these cookies collect is aggregated and therefore anonymous. It is only used to improve how our App and services work. We use performance and measurement cookies in the following ways:

Collecting statistical information about how our users use the App so that we can improve the App and services.

Some of the cookies used on our App are set by us and some are set by third parties who are delivering services on our behalf.

Most computer and some mobile web browsers automatically accept cookies but, if you prefer, you can change your browser to prevent that or to notify you each time a cookie is set. Please note however, that by blocking or deleting cookies you may not be able to take full advantage of our App or services.

#### Disclosure of Information

We may disclose your personal information to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006 (where applicable).

We may disclose your personal information to third parties:

- To comply with a legal obligation
- To protect and defend the rights or property of Willows.
- To prevent or investigate possible wrongdoing in connection with the service.
- To protect the personal safety of users of the service or the public • To protect against legal liability

if we or substantially all of our assets are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets.

As a result of us collecting and processing your information, you have the following legal rights:

- to access personal data held about you.
- to request us to make any changes to your personal data if it is inaccurate or incomplete.
- to request your personal data is erased where we do not have a compelling reason to continue to process such data in certain circumstances.
- to receive your personal data provided to us as a data controller in a structured, commonly used and machine-readable format where our processing of the data is based on: (i) your consent; (ii) our necessity for performance of a contract to which you are a party to; or (iii) steps taken at your request prior to entering into a contract with us and the processing is carried out by automated means.
- to object to, or restrict, our processing of your personal data in certain circumstances.
- to object to, and not be subject to a decision which is based solely on, automated processing (including profiling), which produces legal effects or could significantly affect you.
- to lodge a complaint with a data protection supervisory body, which at present, is the Information Commissioner's Office.

To exercise any of your rights as set out above, including to withdraw your consent where we have stated we are processing your personal data based on your consent, please contact us at [willows.basingstoke@gmail.com](mailto:willows.basingstoke@gmail.com)

### Service Providers

We may employ third party companies and individuals to facilitate our Service ("Service Providers"), to provide the Service on our behalf, to perform Service-related services or to assist us in analysing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

### Children's Privacy

Our Service does not address anyone under the age of 18 ("Children").

We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your Children has provided us with Personal Data, please contact [willows.basingstoke@gmail.com](mailto:willows.basingstoke@gmail.com). If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

### Changes to Our Privacy Policy

We reserve the right to modify this Privacy Policy at any time. Any changes we may make to this Privacy Policy will be notified and made available to you using the App, where appropriate. By continuing to use the App, you are accepting any changes made to this

Privacy Policy. Please check back regularly to keep informed of updates or changes to this Privacy Policy.

#### Contact

All questions, comments and requests regarding this Privacy Policy should be addressed to [willows.basingstoke@gmail.com](mailto:willows.basingstoke@gmail.com).