

Privacy Policy in full

MyWifi Solutions and the service developer/provider (**We**) are committed to protecting and respecting your privacy.

Scope of Policy

This policy (together with our end-user licence agreement as set out through the link in our log in page (**EULA**)) and any additional terms of use incorporated by reference into the EULA, together **Our Terms of Use** applies to your access and use of the MyWifi Solutions WiFi wireless service (the **Service**).

This policy sets out the basis on which any personal data We collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how We will treat it.

For the purpose of the Data Protection Act 1998, the data controllers are MyWifi Solutions and the Service developer/provider.

1. Information we may collect from you

We will collect and process the following data about you:

- i. **Submitted Information:** the log in information which you provide and/or information from your social media account through which you access the Service (e.g. Twitter, Facebook etc). This information will be taken from your social media account and will be subject to your privacy settings or from the input data provided as part of your access process. We may also ask you for information when you enter a competition or promotion and when you report a problem with any of our Service.
- ii. **Additional information:**
 - If you contact us, We may keep a record of that correspondence;
 - We may also ask you to complete surveys that We use for research purposes, although you do not have to respond to them;
 - Details of transactions you carry out through our Service;
 - Details of your use of our Service including, but not limited to, location data, weblogs and other communication data and the resources that you access.
- iii. **Device information:** We may collect information about the mobile telephone, smart phone, hand held device, laptop, computer or any other device used to access and use the Services (**Device**), including, where available, the Device's unique Device identifiers, operating system, browser type and mobile network information as well as the Device's telephone number if applicable, for system

administration and to report aggregate information to our advertisers. We may associate Device information with Submitted Information and will treat the combined information as personal data in accordance with this policy for as long as it is combined.

- iv. **Location information:** We may collect and process information about your actual location. In some locations we may collect data for WiFi-enabled devices present at the location. This data collected as relative signal strength from WiFi access points from with an X/Y coordinate is calculated. This data is linked to the user using the device to access the WiFi and shared with the venue owner and WiFi service provider to help analyse how people move around the location. A device's MAC address is masked to prevent linking this data to other sources.

To learn about use of customer location and your choices visit www.smartstoreprivacy.com

You can opt out of location services by visiting www.smart-places.org

- v. **Log information:** when you use the Service, We may automatically collect and store certain information in server logs, including but not limited to internet protocol (IP) addresses, internet service provider (ISP), clickstream data, browser type and language, viewed and exit pages and date or time stamps.

2. Cookies

Our Services use cookies to distinguish you from other users of our Services. This helps us to provide you with a good experience when you use the Service and also allows us to improve the Service. For detailed information on the cookies We use and the purposes for which We use them, see our cookie policy through the link on the log in page.

3. Storage and retention of your personal data

The data that We collect from you is located and stored on secure regional specific servers however it may be transferred to, and stored at, a destination outside the region as required. It may also be processed by staff operating outside the region who work for us or for one of our suppliers. These staff may be engaged in the fulfilment of the Service or the provision of support services. By joining and using the Service, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on secure servers.

Unfortunately, the transmission of information via the internet is not completely secure. Although We will do our best to protect your personal data, We cannot guarantee the security of your data transmitted via our Service; any transmission is at your own risk. Once We have received your information, We will use strict procedures and security features to try to prevent unauthorised access. As access to the Service is through your chosen social

media platform you should ensure when using these features that you do not submit any personal data that you do not want to be seen, collected or used by other users.

We retain your data for a period of 24 months. After 24 months the data is anonymised and all personal identifying elements are destroyed.

4. Uses made of the information

We use information held about you in the following ways:

- To provide you with information regarding the venue in which you are using the Service including information relating to their goods and services;
- To provide it to the venue owner or sponsor to enable them to see how the venue is being used and by whom and to communicate directly with you
- To report aggregate information to our advertisers or selected third parties for consumer analysis

We may also use your data, or permit selected third parties to use your data, to provide you with information about goods and services that may be of interest to you.

We will only contact you by electronic means (e-mail or SMS) with information about goods and services.

Where We permit selected third parties to use your data, We (or they) will only contact you by electronic means.

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 then you should not use our Service. We provide access to the Service always in accordance with our Terms of Use and this Privacy Policy therefore if you do not accept them then we will cease to provide the Services to you until and unless you do accept them.

We do not disclose information about identifiable individuals to our advertisers, but We may provide them with aggregate information about our users (for example, We may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in SW1). We may make use of the personal data We have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience.

1. Disclosure of your 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 Companies Act 2006.

We may disclose your personal information to third parties:

- To our customers who operate and own the venue where you access the Services.
- To the sponsors of the venue where you access the Services
- To the selected third parties detailed at point 4 above
- 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 MyWifi Solutions 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 or regulatory obligation or request.
- In order to:
 - Enforce or apply the EULA, , terms and other agreements or to investigate potential breaches; or
 - Protect the rights, property or safety of MyWifi Solutions, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

1. Third party sites

Our Services may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates (including, but not limited to, websites on which the Services are advertised). If you follow a link to any of these websites, please note that these websites and any services that may be accessible through them have their own privacy policies and that We do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites or services, such as contact and location data. Please check these policies before you submit any personal data to these websites or use these services.

2. Access to information

The Data Protection Act 1998 gives you the right to access information held about you. Your right of access can be exercised in accordance with that Act. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information We hold about you.

3. Changes to privacy policy

Any changes We may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by SMS or e-mail or notifying you of a change when log onto one of the Services Sites. The new terms may be displayed on-screen and you may be required to read and accept them to continue your use of the Services.

4. Future of privacy forum

We are committed to the need for transparent privacy policies in the field of mobile location analytics and are committed to the Future of Privacy Mobile Location Analytics Code of Conduct.

5. Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to MyWifi Solutions, The Old Police Station, 22 Hind Hill Street, Heywood, OL10 1AQ.