

PRIVACY AND COOKIES POLICY

Bimble Studios Ltd (company number 10870119) (**Bimble / we / our / us**) takes your privacy very seriously and is committed to protecting and respecting it.

If you wish to contact us regarding this privacy and cookies policy, please contact us using the contact details set out **here**. Bimble Studios Ltd is the data controller. Our registered office is at Prama House, 267 Banbury Road, Oxford OX2 7HT.

This privacy and cookies policy (together with the Terms and Conditions, which you can find **here**) sets out the basis on which any personal data we collect from you when you interact with us, or that is provided by you through your use of the Bimble platform via our website (<https://bimblehq.com/>) or mobile application (the **Bimble Platform**), will be processed by us.

This privacy and cookies policy does not apply to websites that you may be able to access via links on the Bimble Platform and/or activities offered by third parties. Please ensure you review any relevant policies on any third party websites before proceeding. We are not responsible for the collection or use of your personal data from third party websites.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

TOPICS COVERED

- DATA WE COLLECT FROM YOU AND SOURCES OF THAT DATA
- PURPOSE AND LEGAL BASIS FOR PROCESSING YOUR DATA
- MARKETING
- DISCLOSURE OF YOUR PERSONAL DATA
- WHERE WE STORE YOUR DATA
- SECURITY
- RETAINING PERSONAL DATA
- YOUR RIGHTS
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This privacy and cookies policy applies to **Consumers** and **Creators** (both as defined in the Terms and Conditions, which you can find **here**).

DATA WE COLLECT FROM YOU OR ABOUT YOU AND OUR SOURCES OF THAT DATA

We will collect the following data about you:

Data you give us. You may give us data about you:

- when you fill out a form via the Bimble Platform;
- when you register or subscribe to become a Creator or Consumer on the Bimble Platform and create a profile;
- when you create a Hit List (as defined in the Terms and Conditions, which you can find **here**) if you are a Creator;

- when you rate or like a Hit List or when you create collections of Hit Lists (for example, you may have a collection that deals with Hit Lists relating to Oxford);
- when you create a link to your or a third party's website, for example, social media platforms;
- if you sign up to receive marketing communications from us about us, the Bimble Platform, Hit Lists and other products or services we offer;
- if you complete a survey, for example, about the Bimble Platform;
- when you report a problem with the Bimble Platform;
- when you provide us with feedback, opinions and / or comments regarding the Bimble Platform;
- when you transmit or upload content including, but not limited to photographs, opinions and reports to the Bimble Platform;
- if you contact or correspond with us (for example, by phone, e-mail or otherwise) for any other reason (for example, to request further services from us); and
- when you use any interactive services on the Bimble Platform.

Data we collect about you. We will automatically collect the following:

- when you use the Bimble Platform, details of your usage (including the date, time, location or duration of the usage);
 - if you visit the Bimble Platform certain technical information, for example, the type of device (and its unique device identifier) you use to access the Bimble Platform, the Internet protocol (IP) address used to connect your device to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system, mobile network information and platform; and
 - information about your visit to the Bimble Platform including the full Uniform Resource Locators (URL), clickstream to, through and from the Bimble Platform (including date and time), pages you viewed, 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.
- **Data we collect or are provided with from third parties.** We may be given or collect personal data about you by or from third parties:
- when a Creator creates a Hit List on the Bimble Platform. We require them to confirm that they have provided you with the appropriate notices and/or obtained the appropriate consents from you to do so.
 - when you create a link to third party websites, for example, social media platforms.

PURPOSE AND LEGAL BASIS FOR PROCESSING YOUR DATA

We will process the **personal data** held about you for the purposes stated below:

Purpose of processing	Type of personal data	Legal basis for processing
To enable us to process your registration for access and use of the Bimble Platform as a Creator or a Consumer and create your profile as a Creator or a Consumer	Your name, a username, organisation details (if applicable), email address (if applicable), social media username and login details if you are registering using your Google, Facebook or Twitter account (if applicable)	Performance of our contract with you
To provide additional (non-mandatory) information to your profile as a Creator or Consumer	Home town, online biography, a profile photo, gender, date of birth, information about things you love doing and information about your favourite neighbourhoods	Consent
To enable us to let you know if someone has liked your Hit List	Your name, email address and information out the Hit List	Performance of our contract with you
To enable us to identify you and any accounts you hold with us	Your name, username and email address / social media handle (as applicable)	Performance of our contract with you
To create and share a Hit List	Your username, the content you upload (for example, Hit List descriptions, place descriptions, Hit List routes and photographs of the places referred to in the Hit List), and place searches, which are passed to a third party service provider, but which do not identify you, as well as your IP address and user agent	Performance of our contract with you or consent if the content is a photograph
To provide you with a list of previously (and recently) viewed Hit Lists	Your name, username and email address / social media username and login details (as applicable)	Performance of our contract with you
To monitor your use of the Bimble Platform	Your name, username and email address/ social media username and login details (as applicable)	Legitimate Interest – to allow us to ensure that the Bimble Platform is used in accordance with the

		Terms and Conditions
To provide the Bimble Platform and public Hit Lists to other Consumers and Creators	Your name, username, email address and content (for example, photographs will not only be shown in the Hit List, but also curated on the “places page” for the corresponding place for public Hit Lists)	Performance of our contract with you or consent if the content is a photograph
To deal with any enquiries, correspondence, concerns or complaints you have raised	Your name, information about the issue raised, organisation (if applicable), phone number and email address	Legitimate Interest – to allow us to improve the Bimble Platform
To ensure that the Bimble Platform is presented in the most effective manner for you and for your device	The technical information as mentioned above	Legitimate Interest – to allow us to present the Bimble Platform better
For our internal operations, including data analysis, testing, research, statistical purposes and troubleshooting	The technical information as mentioned above	Legitimate Interest – to better understand Consumers and Creators and continuously improve the Bimble Platform
As part of our efforts to keep the Bimble Platform safe and secure	The technical information as mentioned above	Legitimate Interest – to improve and ensure the safety of the Bimble Platform
To suggest Hit Lists on the Bimble Platform to you may be interested in	Your name, username and email address / social media username, gender, age, information about things you love doing and information about your favourite neighbourhoods and location data and the technical information mentioned above (for example, if we see that you like particular Hit Lists we will suggest related Hit Lists to you)	Performance of our contract with you

To allow Consumers and Creators to use and access the Hit Lists and the Bimble Platform worldwide	Your name, username and email address / social media username and login details (as applicable)	Consent
To provide you with information, products or services that you request from us or which we feel may interest you (including Hit Lists)	Your name, username and email address / social media username and login details (as applicable), gender, age, information about things you love doing and information about your favourite neighbourhoods and location data and the technical information mentioned above (for example, if we see that you like particular Hit Lists we will suggest related Hit Lists to you)	Consent
To provide personalised online content to you (via the Bimble Platform, social media platforms or our online partners)	The technical information mentioned above, your name and email address / social media username and login details (as applicable)	Consent
To notify you about changes to any element of the Terms and Conditions, Bimble Platform, for example, an update or upgrade, or this privacy and cookies policy	Your name, username and email address / social media username and login details	Performance of our contract with you

Where we need to collect personal data by law or as part of a contract we have with you and you fail to provide that data when requested, we may not be able to provide you with the Bimble Platform.

Where we have a legal basis to use your personal data without consent (as we have described above), this policy fulfils our duty to process personal data fairly and lawfully and in a manner that you would expect given the nature of our relationship with you, by giving you appropriate notice and explanation of the way in which your personal data will be used.

Where consent is required for our use of your personal data as described above, we will request your consent. Typically, we would collect your consent by you performing an action such as ticking the appropriate consent box or otherwise communicating your consent to us (for example, by email or by you providing us with non-mandatory information), you consent to our use of that personal data as set out in this policy. For example, we will only process your personal data for marketing purposes if we have your consent to do so.

You can always change your mind about our processing of your personal data. If you change your mind you can update your account settings within the Bimble Platform, or contact us by email at legal@bimblehq.com, or in respect of marketing messages you can unsubscribe by using the unsubscribe link at the bottom of our marketing messages.

MARKETING

We would like to provide you with information by email about us, the Bimble Platform, Hit Lists and other products and services which may be of interest to you. We will only provide you with marketing communications if you would like us to. You can tell us by ticking the relevant boxes when you first access the Bimble Platform or by updating your account settings at any time.

If you no longer wish to receive marketing communications from us, please contact us using the contact details set out **below**.

You can also manage your preferences by updating / changing the privacy settings of your account.

DISCLOSURE OF YOUR PERSONAL DATA

We may share your personal data with selected third parties in accordance with this policy, including:

- any member of our group of companies, including our subsidiaries and ultimate holding company;
- service providers (for example, IT services), business partners, suppliers and sub-contractors for the performance of any contract we enter into with you, but also when providing you with marketing communications;
- analytics and search engine providers that assist us in the improvement and optimisation of the Bimble Platform;
- government or other law enforcement agencies, in connection with the investigation of unlawful activities or for other legal reasons (this may include your location information);
- in the event that we sell any business or assets or receive investment into our business, in which case we may disclose your personal data to the prospective buyer or investor;
- professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services;
- if Bimble's or substantially all of its assets are acquired by a third party, in which case personal data held by us, including your personal data, will be one of the transferred assets; and
- 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 the Terms and Conditions for the

Bimble Platform or any other contract between you and us; or to protect the rights, property or safety of us, Consumers, Creators and others.

WHERE WE STORE YOUR PERSONAL DATA

Your personal data will be transferred to, processed and stored at destinations outside the European Economic Area (**EEA**) such as the US.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. To find out which countries are covered by this, please see **here**.
- Where there is no adequacy decision by the European Commission in respect of these countries (to the extent that they are outside the EEA), which means they are not deemed to provide an adequate level of protection to your personal data, we ensure that your personal data receives an adequate level of protection. We have therefore put in place the following measures to ensure that your personal data is treated by those third parties in a way that is consistent with EU and UK laws on data protection:
 - EU-US Privacy Shield; and/or
 - EU standard contractual clauses.

If you would like to find out more about these safeguards in respect of processing of your personal data, please contact us at legal@bimblehq.com.

The Bimble Platform can also be accessed and used worldwide, which means your data may be processed outside the EEA. Please note that the country from which you are accessing personal data may not provide an adequate level of protection for your personal data.

SECURITY

All information you provide to us is stored on secure servers. We will use appropriate technical and organisational measures to safeguard your personal data.

If you are a Creator or a Consumer and we have given you (or you have chosen) a password which enables you to access the Bimble Platform, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

We maintain, and ensure that anyone we share your personal data with maintains, appropriate technical and organisational measures to ensure that an appropriate level of security in respect of all personal data we process. 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 the Bimble Platform; any transmission is at your own risk. Once we have received your personal data,

we will use strict procedures and security features to try to prevent unauthorised access or inadvertent disclosure.

RETAINING PERSONAL DATA

We will retain the personal data we receive or collect about you for the period reasonably required for us to use it in accordance with this privacy and cookies policy or in accordance with our legal rights and obligations. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Unless we inform you otherwise (or you request that we erase your personal data), we will retain your personal data on record:

- for as long as you continue to use the Bimble Platform. However, if you do not use the Bimble Platform for 12 months then we may contact you to inform you that your data / account will be deleted within 12 months unless you access your account to stop this process.
- for the duration of your use of the Bimble Platform as a Consumer (this data is collected on a session per session basis).

Even if you request that we erase your data, we may still need to keep it (please see below) or may keep it in a form that does not identify you.

YOUR RIGHTS

You have the following rights with regard to your personal data:

- **Access.** You have the right to access data we hold about you. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Rectification or erasure.** You have the right to request that we rectify or delete any personal data that we hold about you (unless we have the legal right to retain it). If you request that we erase any personal data that we require in order to provide the Bimble Platform to you, you may no longer be able to use it. This right does not extend to non-personal data. It is likely to be necessary for us to retain your personal data to enable us to carry out our contract with you and your rights under applicable law to request erasure may be limited accordingly.
- **Data portability.** You have the right to obtain personal data we hold about you, in a structured, electronic format, and to transmit such data to another data controller if the legal basis for processing such personal data is consent or performance of a contract.
- **Restriction.** You also have the right to restrict us from processing your personal data if the data is inaccurate, the processing is unlawful or we no longer need to your personal data for the purposes for which we hold it.

- **Object / Change of preferences.** You have a right to request that we stop processing your personal data where we are relying on a legitimate interest (or those of a third party). You also have the right to object where we are processing your personal data for direct marketing purposes. For example, if you have given your consent to receive updates from us about new Hit Lists, but have changed your mind, you have the ability to opt out from receiving such communications going forward by contacting us using the details provided below or clicking the relevant link in any communications you receive.
- **Complaints.** If for any reason you are not happy with the way that we have handled your personal data, please contact us. If you are still not happy, you have the right to make a complaint to the Information Commissioner's Office.
- **Automated decision making.** We may carry out decisions based solely on automated processing, including profiling. However, these decisions have no legal or similarly significant effects on you. If they do then you may have the right to object.

Please note that if you ask us to stop processing your personal data in a certain way or erase your personal data, and this type of processing or data is needed to facilitate your use of any of the Bimble Platform you may not be able to use the Bimble Platform as you did before, or at all. This does not include your right to object to direct marketing, which can be exercised at any time without restriction. Please allow at least 10 working days for your request to be actioned.

Please note that the rights mentioned above do not extend to **non-personal data**. Please also note that it is likely to be necessary to retain your personal data for the purposes of assessing and verifying data that is submitted and/or held on the Bimble Platform and to manage the Bimble Platform, so therefore your rights under applicable law to request erasure may be limited accordingly.

If you would like to exercise any of the rights mentioned above, please contact us at using the details set out **below**.

COOKIES

We use cookies, which are small files of letters and numbers that we store on your browser or the hard drive of your computer or mobile device if you agree. Cookies contain information that is transferred to your computer's or mobile device's hard drive.

We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of the Bimble Platform. They include, for example, cookies that enable you (if you are a Creator or a Consumer) to log into the Bimble Platform.
- **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around the Bimble Platform when they are using it. They also enable us to see how users use the Bimble Platform. This helps us to improve the way the Bimble Platform works.

- **Functionality cookies.** These are used to recognise you when you return to the Bimble Platform. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Targeting cookies.** These cookies record your visit to the Bimble Platform, the pages you have visited and the links you have followed. We will use this information to make the website and the advertising displayed on it more relevant to your interests.

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Cookie	Purpose
bimble_auth	Storing authentication state

By clicking “accept” on the cookie consent box when you first access the Bimble Platform and by continuing to access and use the Bimble Platform you accept our use of the cookies.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of the Bimble Platform.

For more detailed information about cookies and how they can be managed and deleted, please visit www.allaboutcookies.org.

CHANGES TO THE PRIVACY AND COOKIES POLICY

Any changes we make to our privacy and cookies policy in the future will be posted on [Privacy Policy](#) and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy and cookies policy. Continued use of the Bimble Platform will signify that you agree to such changes.

HOW TO CONTACT US

Questions, comments and requests regarding the privacy and cookies policy are welcomed and should be addressed to Bimble Studios Ltd at Prama House, 267 Banbury Road, Oxford, OX2 7HT or by email at legal@bimblehq.com.

Please also contact us if you would like to know more about our data processing activities, to update or amend any of your personal data which you have provided to us or if you believe our records relating to your personal data are incorrect.

This privacy and cookies policy was last updated on 27/11/2018