

# Privacy Policy

BeBox Limited (“we/us”) built the OPO (“App”) to be provided as a free app and we respect your privacy through the provision of the App and our Website. Our services are therefore provided on an ‘as is’ basis.

This Privacy Policy (together with our Terms and Conditions and any other documents or terms incorporated by reference) describes the type of information that we collect from our visitors or customers (“you/your”) through the use of our services available to you (“Services”), or the use of our website found at the domain [www.OPOmoments.world](http://www.OPOmoments.world), [www.OPO.world](http://www.OPO.world) and [www.be-box.com](http://www.be-box.com) (“Website”), and how that information may be used or disclosed by us and the safeguards we use to protect it.. The Personal Information that we collect is used for providing and improving the Services. We will not use or share your information with anyone except as described in this Privacy Policy.

We have drafted this Privacy Policy to be as clear and concise as possible. Please read it carefully to understand our policies regarding your information and how we will treat it. By downloading our App, using or accessing our Website or the Services, you agree to the collection, use and disclosure of information in accordance with this Privacy Policy. This Privacy Policy may change from time to time and your continued use of the Website, App or the Services is deemed to be acceptance of such changes, so please check periodically for updates.

The App is not intended for children and we do not knowingly collect data relating to children. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

## Who are we?

We will only process personal information you in accordance with the Data Protection Legislation which for the purposes of this Privacy Policy shall mean: (i) unless and until the GDPR is no longer directly applicable in the UK, the General Data Protection Regulation ((EU) 2016/679) and any national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK and then (ii) any successor legislation to the GDPR or the Data Protection Act 1998 and other applicable privacy laws. Here are the details that Data Protection Legislation says we have to give you as a ‘data controller’:

- Our site address is [www.OPOmoments.world](http://www.OPOmoments.world), [www.OPO.world](http://www.OPO.world) and [www.be-box.com](http://www.be-box.com)
- Our company name is BeBox Limited
- Our registered address 21 Ganton Street, London, England, W1F 9BN.
- Our company number is 09660479
- Our nominated data compliance representative is Elliot Cox and they can be contacted at [support@OPO.world](mailto:support@OPO.world)

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues or other competent supervisory authority of an EU member state if the App is downloaded outside the UK.

## The Website and App

When you use or contact our App and/or Website, you do so at your own discretion and provide any such personal details requested at your own risk. Your personal information is kept private and stored securely until a time it is no longer required or has no use, as detailed below. Every effort has been made to ensure a safe and secure form to email submission process, but we advise users using such form to email processes that you do so at your own risk.

## What information do we collect?

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, username or similar identifier.
- **Contact Data** includes contact address, email address and telephone numbers.
- **Financial Data** that may include bank account and payment card details if you purchase anything from us. However, we always use secure third party payment providers.
- **Transaction Data** that may include details about payments to and from you if relevant, as well as other details of products and services.
- **Technical Log Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access the App and our Website.
- **Profile Data** includes your username and password, purchases or orders made by you (if applicable), your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our Website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Interaction Data** includes any information that you might provide to any discussion forums on the Website or the App.
- **Location Data** includes specific GPS information to enhance the functionality of the App and it is necessary for the performance of the App.
- **Cookies Data** like many websites, we may use some "cookies" to enhance your experience and gather information about visitors and visits to our websites. Please refer

to the “Do we use ‘cookies?’” section below for information about cookies and how we use them and what kind.

- **Third Parties and 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. In this case we will have informed you when we collected that data that it may be shared internally and combined with data collected on our Website. We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, affiliates, analytics providers and search information providers etc) and may receive information about you from them.
- **Analytics** includes third-party analytics services (such as Google Analytics) to evaluate your use of the App and Website, compile reports on activity, collect demographic data, analyse performance metrics, and collect and evaluate other information relating to our Website and internet usage. These third parties use cookies and other technologies to help analyse and provide us the data. By accessing and using the Website, you consent to the processing of data about you by these analytics providers in the manner and for the purposes set out in this Privacy Policy.

## How is your personal data used?

We (or third party data processors, agents and sub-contractors acting on our behalf) may collect, store and use your personal information by way of different methods to collect data from and about you including through:

**Direct interactions.** This is information (including Identity, Contact, Financial, and Marketing and Communications Data) you consent to giving us about you by filling in forms on the App site and the Website (together “Our Sites”), or by corresponding with us (for example, by email or chat). It includes information you provide when you register to use the App, download or register an App, subscribe to any of our Services, search for an App, make an in-App purchase, share data via an App’s social media functions, enter a competition, promotion or survey, use the Website when you create an account with us or request marketing to be sent to you and when you report a problem with an App, our Services, or our Website. If you contact us, we will keep a record of that correspondence.

**Information we collect about you and your device either automated or otherwise.** Each time you visit one of our Sites or use our App we will automatically collect personal data including Technical Log Data. We collect this data using cookies and other similar technologies including server logs. We may also receive technical data about you if you visit other websites employing our cookies.

**Location Data.** We also use GPS technology to determine your current location. Some of our location-enabled Services require your personal data for the feature to work. If you wish to use the particular feature, you consent to your data being used for this purpose. You can withdraw your consent at any time by disabling Location Data in your settings.

**Marketing Data.** If you have opted-in to receive any e-mail newsletters or marketing services, we may send you periodic e-mails. If you would no longer like to receive promotional e-mail from us, please refer to the “How can you opt-out, remove or modify information you have provided to us?” section below.

**Information we receive from other sources including third parties and publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below (the list is not exhaustive and will vary);

- **Device Data** from the following parties: analytics providers such as Google Firebase based outside the EU; advertising networks including Facebook, Twitter and Google based outside the EU;
- **Contact, Financial and Transaction Data** from providers of technical, payment and delivery services including Apple Store and Play Store based outside the EU;
- **Identity and Contact Data** from data brokers or aggregators;
- **IT and Software** – we will use professional support services when appropriate to do so. We currently use Webpurify to prevent inappropriate images or text;
- **Professional advisors** – we may also share your personal information with our professional advisors (including lawyers and accountants) to take advice etc;
- **Marketing data** including Mailchimp for email marketing based outside the EU;
- **Location data** including Mapbox, Graphhopper and Google Maps Places API; based inside and outside the EU; and
- **Identity and Contact Data** from publicly available sources such as Companies House and the electoral register based inside the EU.

We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

If you are already our customer, we will only contact you electronically about things similar to those previously sold to you or downloaded by you.

If you are a new customer, you will only be contacted if you agree to it.

We may keep a record of those links which are used the most to enable us to provide the most helpful information, but we agree to keep such information confidential and you will not be identified from this information.

## **Cookies**

Cookies are files with a small amount of data that are commonly used as anonymous unique identifiers. These are sent to your browser from the websites that you visit and are stored on your device’s internal memory.

The Services do not use these “cookies” explicitly. However, the App may use third party code and libraries that use “cookies” to collect information and improve their services. You have the option to either accept or refuse these cookies and know when a cookie is being sent to your device. If you choose to refuse our cookies, you may not be able to use some portions of the Services.

We may contract with third-party service providers to assist us in better understanding our Website visitors. These service providers are not permitted to use the information collected on our behalf except to help Us conduct and improve our business as authorised by us.

All Cookies used by and on our Website and App are used in accordance with current English and EU Cookie Law.

The Website and App uses cookies or similar technology to collect information about your access to the Website and App. Cookies are pieces of information that include a unique reference code that a website transfers to your device to store and sometimes track information about you.

A few of the 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 the Website and will last for longer.

**All cookies used on our Website and App are set by us.**

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. You can prevent the setting of cookies by adjusting the settings on your browser. Please note however, that by blocking or deleting cookies you may not be able to take full advantage of the Website or App.

**Our cookies will be used for:**

**Essential session management**

- creating a specific log-in session for a user of the site in order that the Website and App remembers that a user is logged in and that their page requests are delivered in an effective, secure and consistent manner;
- recognising when a user of the Website and App has visited before allowing us to identify the number of unique users we receive to the Website and make sure we have enough capacity for the number of users that we get;
- recognising if a visitor to the Website and App is registered with us in any way;
- We may also log information from your computer including the existence of cookies, your IP address and information about your browser program in order to allow us to diagnose problems, administer and track your usage of our Website.

**Functionality**

- customising elements of the promotional layout and/or content of the pages of the Website and App.

### **Performance and measurement**

- collecting statistical information about how our users use the Website and App so that we can improve their functionalities and learn which parts are most popular to users.

If you wish to change you cookie settings, you may do so but each browser is a little different, so look at your browser Help menu to learn the correct way to modify your cookies. If you turn cookies off, you won't have access to many features that make your Website experience more efficient and some of our services will not function properly. However you can still contact us directly.

### **Purpose for which we will use your personal data**

We will only use your personal data when the law allows us to do so. Most commonly we will use your personal data in the following circumstances:

- Where you have consented before the processing.
- Where we need to perform a contract we are about to enter or have entered with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

We will only send you direct marketing communications by email or text if we have your consent. You have the right to withdraw that consent at any time by contacting us at [support@OPO.world.com](mailto:support@OPO.world.com).

We have set out below, in a table format, a description of the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. Please note this list is not exhaustive of the forms of data that we may collect.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>

<p>To install the App and register you as a new App user</p>	<p>Identity</p> <p>Contact</p> <p>Financial</p> <p>Device</p>	<p>Your consent</p>
<p>To process in-App purchases and deliver Services including managing payments and collecting money owed to us</p>	<p>Identity</p> <p>Contact</p> <p>Financial</p> <p>Transaction</p> <p>Device</p> <p>Marketing and Communications</p> <p>Location</p>	<p>Your consent</p> <p>Performance of a contract with you</p> <p>Necessary for our legitimate interests (to recover debts due to us)</p>
<p>Receiving details on our website, to register new customers, including completing registration forms or to submit an enquiry with us by phone, email or via our website.</p>	<p>(a) Identity</p> <p>(b) Contact</p>	<p>(a) Necessary for our legitimate interests (to complete new business)</p> <p>(b) Performance of a contract</p>
<p>Information to carry out our services with our customers including:</p> <p>(a) accounting services</p> <p>(b) invoicing</p> <p>(c) Manage payments, fees and charges</p> <p>(d) Collect and recover money owed to us</p> <p>(e) Process purchases</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Financial</p> <p>(d) Transaction</p> <p>(e) Marketing and Communications</p>	<p>(a) Performance of a contract</p> <p>(b) Necessary for our legitimate interests (to recover debts due to us)</p>

(f) Undertake customer reviews		
Information to manage our relationship with our customers, or prospective customers which will include: (a) Notifying about changes to our terms  (b) Asking to leave a review or take a survey  (c) Correspondence  (d) For internal administrative purposes	(a) Identity  (b) Contact  (c) Profile  (d) Usage  (e) Marketing and Communications	(a) Performance of a contract  (b) Necessary to comply with a legal obligation  (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable customers and prospective customers to partake in a prize draw, loyalty membership, competition or complete a survey	(a) Identity  (b) Contact  (c) Technical  (d) Cookies	(a) Performance of a contract  (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity  (b) Contact  (c) Profile  (d) Usage  (e) Marketing and Communications  (f) Technical  (g) Cookies	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)  (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisement and promotional activity to	(a) Technical  (b) Usage	Necessary for our legitimate interests (to study how customers use our

measure or understand the effectiveness of the advertising we are providing	(c) Cookies	products/services, to develop them, to grow our business and to inform our marketing strategy)
To recruit, support and manage staff for operational reasons	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to operate the business)

## How do we store your data and security?

We will keep personal data for as long as is necessary which is usually the life of our relationship and up to a period of six years after our relationship have ended. We may however be required to retain personal data for a longer period of time to ensure we comply with our legislative and regulatory requirements. We review our data retention obligations to ensure we are not retaining data for longer than we are legally obliged to.

We may transfer your collected data to storage outside the European Economic Area (EEA). If we do store or transfer data outside the EEA, we will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the EEA and under the GDPR. Where such processing takes place, appropriate controls, such as the adoption of agreements containing appropriate standard clauses are in place to ensure that your information is protected to the same standard as if it were in the UK. We will do what we reasonably can to keep your data secure, and up to date and in accordance with this Privacy Policy. Your acceptance of this Privacy Policy shall be your consent permitting us to store or transfer data outside the EEA if it is necessary for us to do so.

Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see the [European Commission: EU-US Privacy Shield](#).

Data security is of great importance to us, and to protect your data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure data collected through our Website and our App.

We have implemented security measures such as a firewall to protect any data and maintain a high level of security.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Notwithstanding the security measures that we take, it is important to remember that the transmission of data via the internet may not be completely secure and that you are advised to take suitable precautions when transmitting to us data via the internet and you take the risk that any sending of that data turns out to be not secure despite our efforts.

If we give you a password upon registration on our Website or the App, you must keep it confidential. Please don't share it.

## **How do we protect visitor information?**

We implement a variety of security measures to protect and maintain the safety of your personal information including encrypted software. Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems, and are required to keep the information confidential.

## **Disclosure of information to other parties?**

As already indicated above, to enable us to provide our Services to you, we will contract with third parties to supply services to you on our behalf. Other third parties providers may include payment processing, software providers, delivery of solutions or additional services, search engine facilities, advertising and marketing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, we will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, our obligations, and the obligations of the third party under the law.

However, non-personally identifiable visitor information may be provided to other parties for marketing, advertising, or other uses.

We are also allowed to disclose your information in the following cases:

- If we want to sell our business, or our company, we can disclose it to the potential buyer
- We can disclose it to other businesses in our group
- We can disclose it if we have a legal obligation to do so, or in order to protect other people's property, safety or rights;
- in connection with legal proceedings (including prospective proceedings);
- in order to establish or defend our legal rights; and
- we can exchange information with others to protect against fraud or credit risks.

Where any of your data is required for such a purpose, we will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, our obligations, and the obligations of the third party under GDPR and the law.

## **Change of Purpose**

We will only use your personal data for the purposes for which we collect it and to enable us to carry out our business with you, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **Links to Other Sites**

Our Website and App may contain links to other websites. If you click on a third-party link, you will be directed to that site. Note that these external sites are not operated by us. Therefore, we strongly advise you to review the Privacy Policy of these websites. We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

## **Children's Privacy**

These Services do not address anyone under the age of 16. We do not knowingly collect personally identifiable information from children under 16. In the case we discover that a child under 16 has provided us with personal information, we immediately delete this from our servers. If you are a parent or guardian and you are aware that your child has provided us with personal information, please contact us so that we will be able to do necessary actions.

## **Your Rights**

When you submit information to us, you may be given options to restrict our use of your data. We aim to give you strong controls on our use of your data (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails and at the point of providing your details).

Under the GDPR, you have the right to:

- request access to, deletion of or correction of, your personal data held by us at no cost to you;
- request that your personal data be transferred to another person (data portability);
- be informed of what data processing is taking place;

- restrict processing;
- to object to processing of your personal data; and
- complain to a supervisory authority.

You also have rights with respect to automated decision-making and profiling.

To enforce any of the foregoing rights or if you have any other questions about our App, Website or this Privacy Policy, please contact us at support@OPO.world.

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes.

## **Social Media**

Communication, engagement and actions taken through external social media platforms that this Website, App and us participate on are custom to the terms and conditions applicable by the social media supplier as well as the privacy policies held with each social media platform respectively.

You are advised to use social media platforms wisely and communicate / engage upon them with due care and caution in regard to your own privacy and personal details. This Website nor its owners will never ask for personal or sensitive information through social media platforms and encourage users wishing to discuss sensitive details to contact them through primary communication channels such as by email.

This Website may use social sharing buttons which help share web content directly from web pages to the social media platform in question. You are advised before using such social sharing buttons, that you do so at your own discretion and note that the social media platform may track and save your request to share a web page respectively through your social media platform account.

We may share web links through our social media platform accounts to relevant web pages. By default some social media platforms shorten lengthy urls.

You are advised to take caution and good judgement before clicking any shortened urls published on social media platforms by this Website. Despite the best efforts to ensure only genuine urls are published, many social media platforms are prone to spam and hacking and therefore we cannot be held liable for any damages or implications caused by visiting any shortened links.

## **Changes to This Privacy Policy**

We may update our Privacy Policy from time to time. Thus, you are advised to review this page periodically for any changes. We will notify you of any changes by posting the new

Privacy Policy on this page. These changes are effective immediately after they are posted on this page.

## **Contact Us**

If you have any questions or suggestions about our Privacy Policy, do not hesitate to contact us.

## **Your Consent**

By using our Website and/or App and by way of acknowledgment, you consent to our Privacy Policy.

## **Dispute Resolution**

The Parties will use their best efforts to negotiate in good faith and settle any dispute that may arise out of or relate to this Privacy Policy or any breach of it.

If any such dispute cannot be settled amicably through ordinary negotiations between the parties, or either or both is or are unwilling to engage in this process, either party may propose to the other in writing that structured negotiations be entered into with the assistance of a fully accredited mediator before resorting to litigation.