

## Privacy policy for ReelPay app

Innovative PPAS Limited trading as ReelPay and its affiliated companies including Innovative Technology Limited (“ReelPay” or “we”, “us”, or “our”) are committed to protecting your privacy. This Statement of Privacy applies to the ReelPay app and governs data collection and usage. By using the ReelPay app (“the app”) you consent to the data practices described in this statement.

### Collection of your Personal Information

Typically we collect data in order to provide the services that customers purchase or request from us. For example, we may capture identifiable information, such as your e-mail address, name, home address, or telephone number. Via this app the data collected is the information you provide to us when registering.

There is also information about your computer hardware and software that is automatically collected by PPAS. This information can include: your IP address, browser type, domain names and access times. This information is used by ReelPay for the operation of the service, to maintain quality of the service, and to provide general statistics regarding use of the app.

To update or change your personal information held on the app or to opt out for any reason contact us via email: [privacy@innovative-technology.com](mailto:privacy@innovative-technology.com). You can find out what data we hold about you in the same way. If you’ve signed up for email alerts, you can unsubscribe or change your settings at any time by selecting the ‘unsubscribe’ link that appears in every email.

### Use of your Personal Information

ReelPay collects and uses your personal information to operate the app and deliver the services you have requested. Including:

- to enable you to access our app and website;
- process orders that you have submitted for services;
- to carry out our obligations arising from any contracts entered into by you and us;
- to provide and improve customer support;
- To maintain our records and other administrative functions;
- to provide alerts and service communications;
- seek your views or comments on the services we provide;
- notify you of changes to our services;
- send you communications which you have requested and that may be of interest to you. These may include information about campaigns, appeals, other international trade activities, promotions of our associated companies goods and services;

We review our retention periods for personal information on a regular basis. We are legally required to hold some types of information to fulfil our statutory obligations (for example the collection of accounting data). We will hold your personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with us. Your Personal Data may be kept longer if we cannot delete it for technical reasons.

### Legal grounds for handling personal information

Data protection laws require that, where we process your personal data, we must satisfy at least one prescribed condition for processing. These are set out in data protection law and we rely on a number of different conditions for the activities we carry out.

## Necessary for performance of a contract or to comply with law

In most cases, the information described above will be provided to us by you because you want to take services from us or engage with us and our use of your information will be governed by contract terms [www.reel-pay.com/ReelPay\\_TCs.pdf](http://www.reel-pay.com/ReelPay_TCs.pdf). Giving this information to us is therefore your choice. If you choose not to give all or some of it to us, this may affect our ability to provide the services you want, to you. In particular, we may rely on this condition for processing in the following scenarios:-

- To enable you to access our website and use our services.
- To let you know about significant changes to product, terms or privacy policy.
- To confirm your identity and authenticate the information you provide.
- To process payments and collect arrears.
- To provide and improve customer support.
- To provide alerts.
- To send you service communications.

## Consent

Where we collect other information from you such as when we use cookies to collect information about the device you use to access our website, or sometimes third parties collect this on our behalf. You will be asked to consent to this before using our website. If you choose not to give your consent, or you later remove your consent, this may affect our ability to provide the services you want, to you. We may also rely on consent in the following scenarios:-

- Market research – we may send you invitations to participate in market research. If you do so, your feedback is given with your consent.
- Administration of prize draws, competitions, membership offers, surveys and other promotional activities.

## Necessary in our legitimate interests or those of a third party

In the United Kingdom, we can also use personal information where the benefits of doing it are not outweighed by the interests or fundamental rights or freedoms of individuals. The law calls this the “Legitimate Interests” condition for processing. Where we rely on it, the benefits being pursued by us are: -

- Marketing (including electronic marketing);
- Helping to prevent and detect crime such as fraud and money laundering;
- Complying with/supporting compliance with legal and regulatory requirements ;
- Internal training purposes - to enable us to train our staff to better provide services to our customers;
- Reporting and analytical purposes;
- Tracking activity - to help us to improve our services;
- To maintain our records and other administrative purpose;
- Complaint and dispute resolution;
- Email tracking - to improve our communications to our customers.

## Your rights

You have the right to ask us to not process your Personal Information for marketing purposes. We will inform you (before collecting your Personal Information) if we intend to use your Personal Information for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your Personal Information. Alternatively, you can contact us by email at [privacy@innovative-technology.com](mailto:privacy@innovative-technology.com) at any time.

If you have previously given your consent to the use of your Personal Information for marketing purposes, you can choose to stop receiving marketing communications which we send to you from time to time by following the unsubscribe instructions included in such communications. Alternatively, you can opt out of such communications at any time by contacting us by email at [privacy@innovative-technology.com](mailto:privacy@innovative-technology.com)

If you choose not to provide your Personal Data it may prevent us from meeting legal obligations, fulfilling a contract, or performing services required to run your account. Not providing your Personal Data may mean we are unable to provide you with products or services.

### Data storage

We store your data on secure servers in the European Economic Area (EEA). ReelPay is registered with the Information Commissioner's Office.

### Disclosing information

ReelPay does not sell or rent your information to third parties.

ReelPay will not share your information with third parties for marketing purposes. ReelPay will only share information with third parties that you have requested (or permitted).

ReelPay will disclose your personal information, without notice, only if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on ReelPay's site; (b) protect and defend the rights or property of ReelPay; and, (c) act under exigent circumstances to protect the personal safety of users of ReelPay, or the public.

Depending on the products you choose to use we may need to share your Personal Data with the third parties that provide those services. Where your Personal Data are transferred outside of the European Economic Area ("EEA"), we require that appropriate safeguards are in place. We may also disclose personal information to other companies within associated or subsidiary companies and to business partners, or successors in title to our business.

You may contact us by email at [privacy@innovative-technology.com](mailto:privacy@innovative-technology.com) at any time, to request that we:

- update any Personal Information which is out of date or incorrect;
- delete any Personal Information which we are holding about you;
- restrict the way that we process your Personal Information;
- provide your Personal Information to a third-party provider of services; or
- provide you with a copy of any Personal Information which we hold about you.

We will consider all such requests and provide our response within the time period stated by applicable law.

### Use of Cookies

Some parts of our app use cookies, which are small files created when you use our app. ReelPay uses cookies for your convenience to store information, so you do not have to re-enter your data upon each visit. Cookies and other technology are also used to monitor usage of the various features and services of our app, which over time gives us information to improve our site, and to advertise and market our products more effectively.

When you visit our app, cookies will be placed on your device to maximise your experience and to help us understand how we can improve our site. If you prefer not to receive cookies, you can set your browser to either reject all cookies, to allow "trusted" sites to set them, or to accept only those

cookies from those sites you are currently on. However, turning off cookies will hinder your ability to access, use, or navigate portions of the site.

### Security of your Personal Information

ReelPay is committed to taking steps to protect the Information you provide to us, including administrative, technical, and physical measures — to safeguard Information against loss, theft, and misuse, as well as against unauthorised access, disclosure, alteration, and destruction.

Information is accessed only by authorised staff who are instructed to handle Information with confidentiality. It is protected by firewalls and standard industry security measures. We may also transmit sensitive information and transactional data using secure socket layer (SSL) encryption.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect Information, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your Personal Information, we will use strict procedures and security features to try to prevent unauthorised access.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our app or our products and services, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

### Changes to this Statement

We may update our Privacy Statement from time to time. By continuing to use the services and our app, you agree to the latest version of our Privacy Statement. Any changes we make to our Privacy Statement in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our Privacy Statement. If you have any questions regarding this Statement or our use of personally identifiable information on this site, please send us your questions or comments as set forth in the Contact section below.

### Contact Information

If you have any questions in relation to this Statement of Privacy or how we collect, use or store your Personal Information, you can contact us by phone at: +44 (0)161 626 9999, by post at: Innovative Technology Limited, Innovative Business Park, Derker Street, Oldham, OL1 4EQ or by email at: [privacy@innovative-technology.com](mailto:privacy@innovative-technology.com)

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