

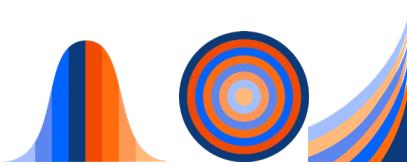
SMARTEST DATA PRIVACY POLICY

Privacy Policy

The legal basis for processing your information.

1. We collect your information for a number of purposes and rely on a number of different legal bases to use your personal information.
2. We collect and use your personal information for a variety of reasons including:
3. If you register to our service
4. To create an account with us
5. To become a subscriber to SMARTEST DATA
6. To facilitate Customer Support
7. To facilitate registration through social networks
8. We may collect publicly available social media profile details when signing up through a social media account such as Facebook, Instagram and Twitter or through an email address. This will only occur if these details are public and include your name and email address. This is for the legitimate interest of understanding the demographics of our users.
9. To place an advertisement
10. We may process your personal information to allow for advertisements that may be within your interests.
11. To deliver marketing, promotions and to conduct research.
12. To receive marketing communications
13. We may send promotional emails about the SMARTEST DATA service and these emails will include a specific option to opt out of future receipt of emails.
14. For competition and promotional purposes
15. We may run competitions or similar promotions. If you choose to enter these, we may use your personal data in line with the specific terms and conditions of these events.
16. To participate in a survey or poll
17. To deliver our content to you
18. To share our content
19. We allow users to share our services through various mediums including by email and through Facebook. If our content is shared with you, we may collect your email address temporarily to fulfil the share option but will not maintain or process this data any further than that.
20. To recommend content
21. We may use data collected to suggest tailored matches on the application in order to ensure that the SMARTEST DATA platform provides the best service possible for its users.
22. To provide an alert service including push and email notifications



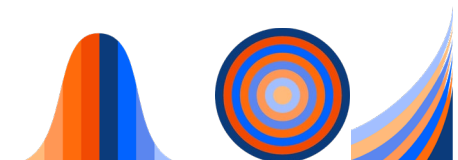


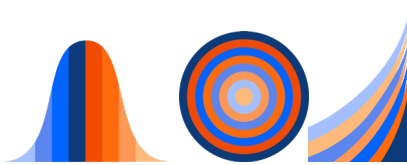
23. To measure the effectiveness of our email communications
24. To support our advertising services from third party vendors
25. Some third-party providers such as Google may provide targeted ads on our website based on data gathered through third party analytics such as Google analytics.
26. To correspond with you
27. If you correspond with us, we will use contact information you provide us to respond to you and only maintain and process this data for that purpose.
28. To manage our everyday business needs
29. We may use your personal information to manage our every business including for auditing, troubleshooting and data analysis. This is for legitimate interests as defined with the description of SMARTTEST DATA's business.

When and how your information is shared.

1. Within our Company
2. We may share your personal information with any member of our Company, which means with third parties.
3. We may share your personal information with third parties for a number of reasons as outlined above and only for a legitimate interest as described above.
4. Third-party service providers
5. We may share your personal information with third-party service providers such as accountants, lawyers, and companies of which we utilise their APIs.
6. Third-party data controllers
7. We may share your personal information with third parties that may receive and process your personal information as a data controller in their own right.
8. Third-party advertisers
9. We disclose non-personally identifiable anonymous information to third-party advertisers to help them reach the relevant audience in the manner described above.
10. Independent auditors
11. We may share your personal data with a third-party auditor to verify collected data which has been processed within the terms of this policy.
12. Social networking sites
13. We may collect data which can be used on social media sites as long as it does not specifically identify you by reference to name, address or any other criteria could potentially identify an individual based on that data alone.
14. Data storage and retention
15. We will retain your personal information as needed to fulfil the purposes for which it was collected. This is only retained for the necessary period of time.
16. International transfers: The Data held and processed by SMARTTEST DATA will be done within the EEA and SMARTTEST DATA will not transfer any data outside of the EEA without prior written consent from the data subject.

Your data rights.





You have data-protection rights in law in relation to your personal information. You have the right, without cost, to:

1. Request a copy of the personal information we hold about you in a structured, commonly used and machine-readable format.
2. Rectify any inaccurate personal information we hold about you.
3. Withdraw your consent where we have relied upon your consent to process your information.
4. Erase the personal information we hold about you subject to certain exceptions.
5. If technically feasible, have your personal information transmitted to another data controller in a machine-readable format at your request.
6. Restrict processing of your personal information in certain circumstances
7. Object to our use of your personal information for our legitimate interests, for profiling and for direct marketing purposes
8. Not be subject to a decision which is based solely on automated processing where that decision produces a legal effect on you or otherwise significantly affects you. We do not make automated decisions of this nature.
9. Lodge a complaint with the appropriate data-protection authority if you have concerns about how we process your personal data.

Please contact us at ww@smartest-data.com in order to allow us to facilitate you in exercising this right. We will endeavour to respond to you within 30 days and may extend this to 60 days if we provide clear reasons as to why an extension is necessary. We will endeavour to respond to your request within a month. If we are unable to deal with your request within a month, we may extend this period by a further two months and we will contact you and explain why.

