

vendi Privacy Policy

vendi is committed to protecting and respecting your privacy.

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). This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed, stored and disclosed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting <https://vendiapp.com> (the **Site**), using vendi's mobile application (the **App**), or using any services offered through or associated with our Site or App (the **Services**), you are deemed to have accepted and consented to the practices described in this policy.

Our Site and App are owned and operated by Elysian AI Limited (referred to in this Policy as **vendi, we, us, or our**). We are registered in England and Wales under company number 11417959. Our registered office address is Unit 6 Queens Yard White Post Lane, Homerton, United Kingdom, E9 5EN. vendi processes personal data as a Data Controller, as defined in the Directive and the General Data Protection Regulation (**GDPR**).

The Site or App may contain links to and from the websites of our partner networks, advertisers and affiliates or to websites shared by other users. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

1. Data We Collect About You

We collect and process personal information so we can provide our Services to you. It's important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

The data we collect and process about you is explained in the sections below.

1.1 Data You Give Us

You give us information about you by filling in forms on our Site or App or by corresponding with us by phone, e-mail and ID, as well as a current picture of your face and ID. This includes information you provide when you register to use the App, post a listing, search for a product, place an order, or use our in-App chat function. The information you give us includes your full legal name, email address, delivery address, payment information, purchase history and behavioural data. We will ask for your explicit consent to use and process information collected during the signup process. Information collected to facilitate sales and purchases is necessary for our legitimate interests and for us to fulfill our contractual obligations to our users.

To maintain the security of the platform we may ask for a proof of ID as a seller or as a buyer and run a KYC check. Only once this is successfully accepted by MangoPay will a user be able to buy or sell. We will not store the ID images but will store the information for KYC purposes via our MangoPay account as long as the account is open or if the account holder has not complied with vendi's Terms and Condition. This allows us to verify your name on your account. This information will be kept confidential between vendi and the seller/buyer unless required by authorities in case of fraudulent activities are committed.

1.2 Data We Automatically Collect

Each time you visit or use our Site, we automatically collect the following information:

- **technical information**, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, location, network data, browser plug-in types and versions, languages, operating system and platform;
- **information about your visit**, including the full Uniform Resource Locators (URL) clickstream to, through and from the Site (including date and time); pages you viewed or searched for; 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 and any phone number used to call our customer service number.

We use this information as statistical data about your browsing actions and patterns, for system administration, and to evaluate, provide, protect or improve our Services (including

by developing new products and services). Because we collect, use and share this information in the aggregate, it does not identify any individual.

1.3 Data We Receive From Third Parties

We use third parties such as Facebook (to facilitate our signup and login process) and MangoPay (for payment processing). For more information on how these companies handle your personal data, please refer to their privacy policies.

2. How We Use Your Data

We use your data to carry out our Site, App and Services in the following ways:

- To administer and manage your account, to provide you with information you request from us, and to carry out any other obligations arising from any contracts entered into between you and us.
- To ensure that content from our Site and App is presented in the most effective manner for you and for your device.
- To allow you to participate in interactive features of our Service when you choose to do so.
- To respond to communications from you and to provide you with information about our Services, including notifying you about changes to our Site, App or Services.
- To request a Peyk pickup or drop of if requested during the buying or selling process to facilitate the delivery of the item.
- To connect you with our insurance partner, so-sure, if during the buying or selling you have requested to insure your phone or have requested information regarding insuring your phone.

We also use your data to make our Site, App and Services better in the following ways:

- To administer the Site and App and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
- As part of our efforts to keep the Site and App safe and secure, e.g. by conducting analysis required to detect malicious data and understand how this may affect your IT system.

We will not send you any unsolicited marketing or spam and will take all reasonable steps to ensure that we fully protect your rights and comply with our obligations under applicable data protection laws. If you are an existing customer, we will only contact you by electronic means (e-mail or SMS) with information about services similar to those which were the subject of a previous enquiry by you. If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have expressly consented to this.

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time. 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, please notify us using the contact information below.

3. How We Secure Your Data

All of your personal information is protected and we have put in place appropriate physical, electronic, and management procedures to safeguard and secure the data we collect. Your information is stored on secure cloud databases, internal servers, and on third party softwares. Your information is only accessible by employees who have authorised access rights to such information. All of your payment information is encrypted using SSL technology.

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

4. How Long We Store Your Data

We only keep your personal information for as long as it's necessary for our original legitimate purpose for collecting the information and for as long as we have your permission to keep it. We will delete your personal information when you delete your account by emailing us at contact@vendiapp.com to request account deletion.

5. Disclosure to Third Parties

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. As we mentioned above, we use the following third parties, who have access to the data we share with their platforms:

- We use **Facebook** to facilitate our signup and login process. If you use Facebook to sign up or log in, certain account, usage and behavioural information is sent to Facebook.
- We use **MangPay** for payment processing. If you buy or sell a phone through vendi, the relevant payment information will be sent to MangoPay.
- If you request a **Peyk** driver for a phone delivery, the relevant delivery information will be sent to Peyk.
- If you request to insure your phone or request information regarding insuring your phone, we refer the relevant account and purchase information to our insurance partner, **so-sure**.

The **only** other circumstances under which we would share your personal data are:

- If the third party is a member of our group (which means any subsidiaries or ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006).
- 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 the Company or substantially all of its assets are acquired by a third party, in which case personal data will be one of the transferred assets and the purchaser will be permitted to use the data for the purposes for which it was originally collected by us.
- If we're under a duty to disclose or share your personal data in order to comply with any legal obligation, enforce or apply our Terms & Conditions and other agreements, or to protect the rights, property, or safety of the Company, our customers, or others (including exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction).

6. International Transfers

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (**EEA**). By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated as securely as it would be within the EEA and under the GDPR. Such steps may include our entering into contracts with any third parties we engage and the use of Commission-approved Model Contractual Clauses. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

You can obtain more details of the protection given to your personal data when it is transferred outside Europe (including a copy of the standard data protection clauses which we have entered into with recipients of your personal data) by contacting us as described in the Contact paragraph below.

7. Your Rights

7.1 Lawful Bases

We will ensure that your personal data is processed lawfully, fairly, and transparently and that it will only be processed if at least one of the following bases applies:

- You have given your clear consent to the processing of your personal data for a specific purpose.
- Processing is necessary for the performance of a contract to which you are a party (or for us to take steps at your request prior to entering into a contract with you).
- Processing is necessary for our compliance with the law.
- Processing is necessary to protect someone's life.
- Processing is necessary for us to perform a task in the public interest or in the exercise of official authority and the task/function has a clear basis in law.
- Processing is necessary for our legitimate interests or the legitimate interests of a third party, except where there is a good reason to protect your personal data which overrides those legitimate interests, such as allowing us to effectively and efficiently manage and administer the operation of our business, maintaining compliance with internal policies and procedures, monitoring the use of our copyrighted materials, offering optimal, up-to-date security and obtaining further

knowledge of current threats to network security in order to update our security.

7.2 Data Subject Rights

Under the GDPR, you have the right to:

- Withdraw your consent to the processing of your personal data at any time. Please note, however, that we may still be entitled to process your personal data if we have another legitimate reason for doing so (such as to comply with a legal obligation).
- Be informed of what data we hold and the purpose for processing the data, as a whole or in parts.
- Be forgotten and, in some circumstances, have your data erased by ourselves and our affiliates (although this is not an absolute right and there may be circumstances where you ask us to erase your personal data but we are legally entitled to retain it).
- Correct or supplement any information we hold about you that is incorrect or incomplete.
- Restrict processing of the information we hold about you (for example, so that inaccuracies may be corrected—but again, there may be circumstances where you ask us to restrict processing of your personal data but we are legally entitled to refuse that request).
- Object to the processing of your data.
- Obtain your data in a portable manner and reuse the information we hold about you.
- Challenge any data we use for the purposes of automated decision-making and profiling (in certain circumstances—as above, there may be circumstances where you ask us to restrict our processing of your personal data but we are legally entitled to refuse that request).
- Complain to a supervisory authority (e.g. the Information Commissioner's Office (ICO) in the UK) if you think any of your rights have been infringed by us. (We would, however, appreciate the chance to address your concerns, so please contact us prior to taking this step).

You will not have to pay a fee to access your personal data (or to exercise any of the other rights) unless your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

You have the right to ask us not to process your personal data for marketing purposes. We will get your express opt-in consent before we use your data for such purposes or share your personal data with any third parties for such purposes, but you can exercise your right to prevent such processing by contacting us using the contact information below or by unsubscribing using the links contained in the marketing emails.

You may revoke your consent for us to use your personal data as described in this Privacy Policy at any time and we will delete your data from our systems. To enforce any of the above rights, please contact us using the contact information below.

We will notify you and any applicable regulator of a breach of your personal data when we are legally required to do so.

8. Cookies

A cookie is a small file of letters and numbers that we store on your browser. Cookies contain information that is transferred to your computer's hard drive (or the hard drive of another relevant device). We use cookies to distinguish you from other users on the Site, to tailor your experience to your preferences, and to help us improve the Site.

Some of the cookies we use are essential for the Site to operate. If you use your browser settings to block all cookies (including essential cookies), you may not be able to access all or parts of our Site.

Before any non-essential cookies are placed on your device, you will be shown a pop-up message requesting your consent to setting those cookies. By default, most internet browsers accept cookies, but you can choose to enable or disable some or all cookies via the settings on your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third party cookies. For further details, please consult the help menu in your internet browser.

We use the following cookies:

- **Strictly necessary cookies.** These cookies are required to save your session and to carry out other activities that are strictly necessary for the operation of the Site. They include, by way of general example, cookies that enable you to log into secure areas of the Site, use a shopping cart, or make use of e-billing services. These

cookies are session cookies, which means they're temporary and will expire when you close your browser.

- **Analytical/performance cookies.** These cookies allow us to recognise and count the number of visitors and to see how visitors move around the Site when they're using it. These cookies help us improve the way the Site works by, for example, ensuring that users are finding what they're looking for easily.
- **Functionality cookies.** These cookies are used to recognise you when you return to the Site. They enable us to personalise our content for you, greet you by name and remember your preferences.
- **Targeting cookies.** These cookies record your visit to the Site, the pages you visit, and the links you follow. We use this information to make the Site and the advertising displayed on it more relevant to your interests. We also share this information with third parties for the same purpose.
- **Social Media cookies.** These cookies work together with social media plug-ins. For example, when we embed photos, video and other content from social media websites, the embedded pages contain cookies from these websites. Similarly, if you choose to share our content on social media, a cookie may be set by the service you have chosen to share content through.
- **Third Party cookies.** We use third party cookies on the Site from Google Analytics and Mixpanel to help us analyse your interactions with our Site. Please note that we do not control cookies placed by third parties and our Site does not block them. Please check the relevant third-party website for more information about these cookies.

You have the right to opt out of social media cookies and third-party cookies and to object to automated profiling. To enforce either of these rights please contact us.

[Changes To Our Privacy & Cookie Policies](#)

Any changes we may make to our Privacy & Cookie Policies in the future will be posted on this page and, where appropriate, notified to you by email. You will be deemed to have

accepted the terms of the updated Privacy & Cookie Policies on your first use of the Site or App following the alterations. Please check back frequently to see any updates or changes to our Privacy & Cookie Policies.

Contact

Questions, comments and requests regarding this Privacy & Cookie Policy are welcomed and should be addressed to our Company Address or to our email at contact@vendiapp.com.

Last updated: 14 June 2019