

PRIVACY POLICY

This is the Privacy Policy of Thumbr, a trade name of IDNA B.V. (hereinafter to be referred to as: "we"). This Privacy Policy describes how we process your personal data if you have registered with us, use our services or websites or have asked us a question.

Personal data that we collect

The personal data that we process may include the following categories of data:

- Your name and sur name
- Your mobile telephone number / MSISDN (mobile station integrated services digital network number)
- Your address details
- Your email address
- The text messages and other messages you send us and receive from us
- The financial data you submitted to us which are necessary for the payment for our services, such as credit card numbers and information about your bank account numbers and the payment provider
- Your mobile network provider
- Data with regard to the start, end and the duration of your use of our services
- The brand and type of your mobile telephone, the type of browser and operating system that you use, web browsing patterns and your IP address
- Any other personal data that you have provided us with

In addition to this, we use cookies when you visit our websites. For more information about this, see the "Cookies" section in this Privacy Policy.

Purposes of processing personal data

We use the personal data described above insofar as is necessary for the following purposes:

- To be able to provide our services to you and to conclude and execute the agreement(s) entered into with you for delivering our services
- To process and collect your payments for our services
- To answer a question you have raised
- For statistical analysis and to improve our services and the user experience
- To send newsletters to you, if you have subscribed to these
- To inform you about our (other) services and promotions, unless you have indicated that you no longer wish to receive this information or if the legislation in your country requires that you have given permission for this, unless you have not given permission for this
- To fulfill our obligations by virtue of law and any applicable codes of conduct
- To protect and defend our rights and to detect and investigate fraud

The reasons for processing your personal data are, depending on the situation, any consent given by you for certain processing operations for your data, the need to process your data to enter into an agreement with you and the performance of this agreement and/or our legitimate interests in processing your personal data for the other purposes listed above.

Providing personal data to third parties

In order to provide our services and to process personal data, we may deploy third parties, so-called processors. These processors work for us and will only process your personal data on behalf of and for us.

We may also transfer your personal data to your mobile network provider, your gateway service provider and/or payment provider insofar as this is necessary for processing and collecting payments and any refunds, for executing the agreement with you and to fulfill our obligations by virtue of law and any applicable codes of conduct.

If we are sold to, taken over by or are involved in a merger with another party or if another party takes over our service in part or in full, for example after bankruptcy, we are entitled to transfer your personal data to this third party, subject to the condition that this party complies with all provisions and limitations included in this Privacy Policy.

Finally, we may provide your personal data to third parties if we believe in good faith that it will be necessary because of the law or a court ruling or to protect or defend our rights.

Parental consent

With regard to persons younger than 16 years we require the parents or legal representatives to have given their consent before personal data are submitted to us. Should personal data nevertheless have been submitted to us without such consent, we will remove the pertinent personal data as soon as possible after becoming aware that this is the case.

Special categories of personal data

We do not collect special categories of personal data (for example data about race, religion or health) If you share special personal data with us, we will remove these as soon as possible after becoming aware that this is the case.

Transfer of personal data outside the EEA or your own country

You agree that we may also transfer your personal data to third parties in other countries for centralizing the files and/or for processing (operations) described in this Privacy Policy. Some of these countries may not be part of the European Economic Area (EEA). We will only transfer your personal data to countries outside the EEA insofar as this is permitted according to the General Data Protection Regulation and subject to the conditions laid down in that Regulation to guarantee that your rights are protected in the same way as they would be within the EEA. In addition to this, if you use our services while you are outside the EEA, your data may be transferred outside the EEA in order for us to provide those services. By agreeing to this Privacy Policy, you agree to the transfer of your personal data to another country, possibly outside the EEA, for the purposes described above. At your request, we will give you a list of the countries involved.

Retention period

We do not retain your data any longer than is necessary for the purposes described in this Privacy Policy.

Access, rectify or delete personal data

You have the right to access your personal data and to request from us that we correct, delete or restrict these. Moreover, you have the right to withdraw your consent for processing the data, the right to object to the processing of your personal data and the right to data portability. In order to exercise these rights, you can send an email to: Info.za@thumbr.com.

Furthermore, you have the right to file a complaint with a supervisory authority.

Security

We will treat all your data as confidential and will take all reasonable technical and organizational measures to protect your personal data. Unfortunately, we cannot give assurance that the data transfer via the Internet and mobile communications network is safe. Therefore, we cannot guarantee the safety of this data transfer and you accept the inherent safety risks of using Internet and mobile networks for sending information.

Cookies

To improve your experience with our website(s), we may use cookies. A cookie is a small text file that is placed in the browser of your computer, tablet or smart phone during a visit to our website(s). Cookies enable us to recognize you at a subsequent visit to our website(s) and to provide your computer with certain characteristics. We do not obtain personal data about you from cookies.

We use cookies for the following purposes:

- Functional purposes, particularly to ensure that the websites work properly, to remember your preferred settings and to make the websites work well and to be able to optimize these.
- Analytical purposes. To this end, we use Google Analytics under a data processor agreement with Google Inc. We use settings that ensure that only anonymized IP addresses are processed (of which the last byte has been masked), we have not given Google permission to use the data for their own purposes and we do not use any other Google services in combination with the Google Analytics cookies. If you want to disable these cookies, you can do so by using the Google Analytics Opt-out Browser Add-on.

You can stop the placement of cookies by changing the settings of your Internet browser so that it no longer stores any cookies. Additionally, you can also remove all the information that was stored previously by changing the settings of your browser. Refer to the "Help"-feature of your browser. We draw your attention to the fact that some web pages of our websites are only accessible when cookies are enabled, and please be aware that blocking cookies may result in you being denied access to some of our content or services.

Amendments to the Privacy Policy

This Privacy Policy came into effect on 20th of March 2019. We reserve the right to amend or adapt this Privacy Policy. If any material changes are made to this Policy, we will publish these changes on our website(s).

CONTACT

If you have any questions about this Privacy Policy, you can contact:

Copyright Thumbr • IDNA B.V. Stadhouderskade 85 1073 AT Amsterdam The Netherlands or send an email to Info.za@thumbr.com.