



Hazaar App Privacy Policy

Last updated on 02/02/2022

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal information. It also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain personal information about you when you visit our website and use the Hazaar mobile application software (“App”) and any services accessible through the App once you have downloaded or streamed a copy of the App onto your mobile telephone or handheld device. Hazaar Limited is responsible as ‘controller’ of your personal information. The website and App are 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.

Key terms

It would be helpful to start by explaining some key terms used in this policy:

We, us, our

Hazaar Limited

Personal information or personal data

Any information about an individual for which that person can be identified

Special category personal information

- Personal information revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership
- Genetic and biometric data
- Data concerning health, sex life or sexual orientation

Personal information we collect about you

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We may collect and use the following personal information about you:

- your name and contact information, including email address, university
- information to enable us to check and verify your identity, e.g. your university email
- your gender information, if you choose to give this to us
- location data, if you choose to give this to us
- your billing information, transaction and payment card information
- your personal or professional interests
- your personal online presence, e.g. instagram profile
- your username and password, contact history, purchase history, details about payments to and from you, and saved items
- information from accounts you link to us e.g. Instagram
- information to enable us to undertake credit or other financial checks on you
- information about how you use our App, website, IT, communication and other systems
- your responses to surveys, competitions and promotions
- your preferences in receiving marketing from us and third parties and your communication preferences
- [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 our website and App] [the type of mobile device you use,] [a unique device identifier [(for example, your device's IMEI number, the MAC address of the device's wireless network interface, or the mobile phone number used by the device)],] [mobile network information,]

If we need to collect personal information by law, or under the terms of a contract we have with you and you do not provide personal information when we ask for, we may not be able to perform the contract we have or are trying to enter into with you and it may delay or prevent us from providing services to you. In this case, we may have to cancel the service you have with us but we will notify you if this is the case at the time.

How your personal information is collected

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We collect most of this personal information directly from you—via our App. However, we may also collect information:

- from publicly accessible sources, e.g. Companies House or HM Land Registry
- directly from third party service providers, e.g.:some text
 - sanctions screening providers;
 - credit reference agencies;
 - customer due diligence providers;
 - analytics providers;
 - providers of technical, payment and delivery services
- Hazaar uses pixel tags to collect information about how users are interacting with the app. Tags include: Sign up, View Item, Click buy now, Complete payment, Exchange order, Send message, List an item, Sell an item, Like an item, Share an item. The information is used by us for the purposes of providing you with a good experience when you use our App or browse our Site and allowing us to improve the App and our Site. We will only use pixel tags if we have your consent. You have the right to withdraw your consent at any time by contacting us. This information will be held for as long as you have an account with us.

How and why we use your personal information

Under data protection law, we can only use your personal information if we have a proper reason for doing so. Most commonly, we will use your personal information in the following circumstances:

- to comply with our legal and regulatory obligations;
- for the performance of our contract with you or to take steps at your request before entering into a contract;
- 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; or
- where you have given consent.

A legitimate interest is the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for

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our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

The table below explains what we use (process) your personal information for and our reasons for doing so:

What we use your personal information for	Our reasons
To install the App and register you as a new App user	Performance of a contract with you
To provide services to you and process payments to and/or from you via the App and collecting money owed to us	• For the performance of our contract with you • Necessary for our legitimate interests (to recover debts due to us)

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To manage our relationship with you including notifying you of changes to the App or our services

- Performance of a contract with you
- Necessary for our legitimate interests (to keep records updated and to analyse how customers use our services)
- Necessary to comply with legal obligations (to inform you of any changes to our terms and conditions)

To prevent and detect fraud against you or Hazaar Limited

For our legitimate interests or those of a third party (to minimise fraud that could be damaging for us and for you)

To conduct checks to identify our customers and verify their identity and screen customers for financial and other sanctions or embargoes

To comply with our legal and regulatory obligations

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To administer and protect our business and this App including troubleshooting, data analysis and system testing

Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security)

- To deliver content and advertisements to you
- To market our services and those of selected third parties where we have consent to you
- To measure and analyse the effectiveness of the advertising we serve you
- To monitor trends so we can improve the App

Consent

Necessary for our legitimate interests (to develop our products/Services and grow our business)

To check your financial standing by credit reference checks via external credit reference agencies

For our legitimate interests or those of a third party (to ensure our customers are likely to be able to pay for our products and services)



The above table does not apply to special category personal information, which we will only process with your explicit consent.

Promotional communications

We may use your personal information to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing). 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.

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

We will always treat your personal information with the utmost respect and never sell or share it with other organisations outside Hazaar Limited for marketing purposes.

You have the right to opt out of receiving promotional communications at any time by:

- contacting us at hello@justhazaar.com
- using the 'unsubscribe' link in emails
- updating your marketing preferences on our App

We may ask you to confirm or update your marketing preferences if you instruct us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

Who we share your personal information with

We routinely share personal information with:

- third parties we use to help deliver our services to you, eg IT, systems administration, marketing and payment service providers
- professional advisors including lawyers, bankers, auditors, insurers, and insurance brokers who provide consultancy, banking, legal, insurance and accounting services



- third parties approved by you, eg social media sites you choose to link your account to or third party payment providers

We only allow our service providers to handle your personal information if we are satisfied they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers relating to ensure they can only use your personal information to provide services to us and to you. We may also share personal information with external auditors, e.g. in relation to ISO or Investors in People accreditation and the audit of our accounts.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal information with other third parties to whom we may choose to sell, transfer or merge parts of our business or our assets.

Alternatively, we may seek to acquire other businesses or merge with them. . Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

We will not share your personal information with any other third party.

How long your personal information will be kept

We will keep your personal information while you have an account with us or we are providing services to you. Thereafter, we will keep your personal information for as long as is reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.



By law we have to keep basic information about our customers for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see your legal rights below for further information.

When it is no longer necessary to retain your personal information, we will delete or anonymise it.

Transferring your personal information out of the EEA

Many of our external third parties are based outside the UK so their processing of your personal information will involve a transfer of data outside the UK.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

If you would like further information on the specific mechanism used by us when transferring your personal data out of the UK please contact us (see 'How to contact us' below).

Your rights

Under certain circumstances, you have the following rights under data protection laws in relation to your personal information:

Access

The right to be provided with a copy of your personal information (the right of access)

Rectification

The right to require us to correct any mistakes in your personal information

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To be forgotten

The right to require us to delete your personal information – in certain situations

Restriction of processing

The right to require us to restrict processing of your personal information

Data portability

The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party

To object

The right to object:

- to your personal information being processed for direct marketing purposes;
- to our continued processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.

Not to be subject to automated individual decision-making

The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

Withdraw consent

You can withdraw your consent to us processing your personal information at any time although this does not impact the processing up to the point of withdrawal

For further information on each of those rights, including the circumstances in which they apply, please contact us - see below 'How to contact us'.

If you would like to exercise any of those rights, please email, call or write to us – see below: 'How to contact us'.

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



We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Keeping your personal information secure

We have appropriate security measures to prevent personal information from being accidentally lost, or used or accessed unlawfully. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality. We continually test our systems, which means we follow top industry standards for information security.

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

How to complain

We hope that we can resolve any query or concern you may raise about our use of your information.

You have the right to make a complaint at any time to the Information Commissioner's Office ("ICO"), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to this privacy policy

This privacy notice was published last updated on 02/02/2022.



We may change this privacy notice from time to time – when we do we will inform you via our App or other means of contact such as email.

How to contact us

Please contact us by email if you have any questions about this privacy policy or the information we hold about you.

Our contact details are shown below:

- Name: Harriet Noy
- hello@justhazaar.com