

**1. Introduction**

- 1.1 This Privacy Policy details how we, WeShamper Limited, company registration number 10326485, registered office 138 Quantock Road, Weston-Super-Mare, England BS23 4DP collect, use and process personal data provided to us. This Privacy Policy affects your legal rights and obligations so please read it carefully. It applies to personal data you provide to us whether you are an Owner, Adventurer or other user of our website. If you do not agree to be bound by this Privacy Policy, do not use our website and do not provide us with any personal data. If you have any questions, you can contact us at [hello@weshamper.com](mailto:hello@weshamper.com).
- 1.2 We reserve the right to update this Privacy Policy from time to time at our discretion. If we do so, and the changes substantially affect your rights or obligations, we shall notify you if we have your email address. Otherwise, you are responsible for regularly reviewing this Privacy Policy so that you are aware of any changes to it.
- 1.3 We are the controller of your personal data for the purposes of applicable data protection legislation. By personal data we mean identifiable information about you, such as your name, email address, gender, mobile and home telephone number and your IP address.

**2. Collecting Your Data**

- 2.1 If you register on the website as an Owner or an Adventurer you must provide us with certain information. We shall notify you at the time of collection any information that is mandatory.
- 2.2 As part of our verification of your compliance with our Terms of Use, and/or as part of your profile on WeShamper, you may provide additional personal data to us.
- 2.3 All personal data that you provide to us must be true, complete and accurate, and you must notify us of any changes to such personal data. If you provide us with inaccurate or false data, and we suspect or identify fraud, we will record this. You must not register under someone else's name.
- 2.4 When you contact us by email or post, we may keep a record of the correspondence and we may also record any telephone call we have with you.
- 2.5 We may also receive personal data about you from other users of WeShamper. In particular, Owners may share with us information about Adventurers, and likewise, Adventurers may share with us information about Owners.
- 2.6 We may also receive personal data about you from third parties, such as from payment providers, insurers and security providers.

**3. Data we automatically collect**

- 3.1 When you use our website, we, or third parties on our behalf, automatically collect and store information about your device and your activities. This information could include (a) your computer or other device's unique ID number; (b) technical information about your device such as type of device, web browser or operating system; (c) your preferences and settings such as time zone and language; (d) geolocation data; and (e) statistical data about your browsing actions and patterns. We collect this information using cookies in accordance with our Cookie Policy and we use the information we collect on an anonymous basis to improve our website

and the services we provide, and for analytical and research purposes. However, we may share geolocation data with an Owner or Adventurer with whom you have agreed terms.

#### **4. Lawful use of your personal data**

- 4.1 We will only use your personal data where we have a lawful basis to do so. The lawful purposes that we rely on under this Privacy Policy are: consent (where you choose to provide it), performance of our contract with you; compliance with legal requirements; and legitimate interests. When we refer to legitimate interests we mean our legitimate business interests in the normal running of our business which do not materially impact your rights, freedom or interests.
- 4.2 The main reason that we use your personal data is to allow you to use the WeShamper platform in accordance with our Terms of Use. [\[link\]](#)
- 4.2 We may also use your personal data for our legitimate interests, including dealing with any customer services you require, enforcing our Terms of Use, for regulatory and legal purposes (for example anti-money laundering and fraud prevention purposes), for audit purposes and to contact you about changes to this Privacy Policy.
- 4.3 You understand that your personal data may be visible to an Owner or Adventurer with whom you have agreed terms in accordance with our Terms of Use.

#### **5. Who do we share your data with?**

- 5.1 For our legitimate interests, we may share your personal data with any service providers, sub-contractors and agents that we may appoint to perform functions on our behalf and in accordance with our instructions, including payment providers, IT service providers, accountants, auditors and lawyers. We shall provide our service providers, sub-contractors and agents only with such of your personal data as they need to provide the service for us and if we stop using their services, we shall request that they delete your personal data or make it anonymous within their systems.
- 5.2 In order to comply with our legal obligations, under certain circumstances we may have to disclose your personal data under applicable laws and/or regulations or in response to a court order including to protect a third party's rights, property, or safety.
- 5.3 For our legitimate interests, we may also share your personal data in connection with, or during negotiations of, any merger, sale of assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or into another company.

#### **6. Marketing**

- 6.1 When you register with us, you will be offered the opportunity to consent to receive news and promotional offers from us. We record your consent. You can choose to no longer receive marketing emails from us by contacting us at [hello@weshamper.com](mailto:hello@weshamper.com) or by clicking unsubscribe from a marketing email. If you do unsubscribe to marketing communications, it may take up to 5 business days for your new preferences to take effect.

- 6.2 If you ask us to remove you from our marketing list, we shall keep a record of your name and email address to ensure that we do not send to you marketing information.

## 7. **Where we hold and process your personal data**

- 7.1 Some or all of your personal data may be stored or transferred outside of the European Economic Area (the EEA) for any reason, including for example, if our email server is located in a country outside the EEA or if any of our service providers are based outside of the EEA
- 7.2 Where your personal data is transferred outside the EEA, it will only be transferred to countries that have been identified as providing adequate protection for personal data or to a third party where we have approved transfer mechanisms in place to protect your personal data – i.e., by entering into the European Commission’s Standard Contractual Clauses, or by ensuring the entity is Privacy Shield certified (for transfers to US-based third parties).

## 8. **Security**

- 8.1 We shall process your personal data in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures. All information you provide to us is stored on our secure servers.
- 8.2 Where we have given, or you have chosen a password, you are responsible for keeping this password confidential.
- 8.3 However, you acknowledge that no system can be completely secure. Therefore, although we take these steps to secure your personal data, we do not promise that your personal data will always remain completely secure.

## 9. **Your rights**

- 9.1 You have a number of rights under applicable data protection legislation. Some of these rights are complex, and not all of the details have been included below. Further information can be found [here](#)

- Right of access: You have the right to obtain from us a copy of the personal data that we hold for you.
- Right to rectification: You can require us to correct errors in the personal data that we process for you if it is inaccurate, incomplete or out of date.
- Right to portability: You can request that we transfer your personal data to another provider.
- Right to restriction of processing: In certain circumstances, you have the right to

require that we restrict the processing of your personal information.

- Right to be forgotten: You also have the right at any time to require that we delete the personal data that we hold for you, where it is no longer necessary for us to hold it. However, whilst we respect your right to be forgotten, we may still retain your personal data in accordance with applicable laws.
- Right to stop receiving marketing information: You can ask us to stop sending you information about our services, but please note we shall continue to contact you in relation to any matters relating to your account on WeShamper.

9.2 Please note, we reserve the right to charge an administrative fee if your request in relation to your rights is manifestly unfounded or excessive.

9.3 If you have any complaints in relation to this Privacy Policy or otherwise in relation to our processing of your personal data, please tell us. We shall review and investigate your complaint and try to get back to you within a reasonable time. You can also contact the Information Commissioner, see [www.ico.org.uk](http://www.ico.org.uk) or if you are based outside of the United Kingdom, please contact your local regulatory authority

## 10. Retention of personal data

10.1 We retain your personal data in accordance with applicable laws. Therefore, if you register with us, we shall retain your personal data until you close your account except where we are required to retain your personal data for longer to comply with accounting and taxation requirements. If you receive marketing communications from us, we shall retain your personal data until you opt out of receiving such communications. If you have otherwise contacted us with a question or comment, we shall retain your personal data for 6 months following such contact to respond to any further queries you might have.

## 11. General

11.1 If any provision of this Privacy Policy is held by a court of competent jurisdiction to be invalid or unenforceable, then such provision shall be construed, as nearly as possible, to reflect the intentions of the parties and all other provisions shall remain in full force and effect.

11.2 This Privacy Policy shall be governed by and construed in accordance with the law of England and Wales, and you agree to submit to the exclusive jurisdiction of the English Courts.

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