

# **Privacy Policy**

Effective Date: Aug 6th, 2020

Thanks for visiting Snapshot Property inspection ("Snapshot Property inspection", "we", "us" or "our") respects your privacy. When it comes to your personal information, we believe in transparency, not surprises. That's why we've set out here what personal information we collect, what we do with it and your choices and rights.

By using any of Snapshot Property Inspection Services, you confirm you have agreed to the <u>Terms of Service</u> and read and understood this Privacy Policy and our <u>Cookie Policy</u>.

# 1. Some key terms

In our Privacy Policy, when we refer to "Users", we mean our customers who use our Services, including visitors to our sites. We explain who we are in the "Who is Snapshot Property Inspection?" section below.

The users, visitors and customers of Snapshot Property Inspection are "End Users". Any other capitalized terms not defined in this Privacy Policy have the meanings in our <u>Terms of Service</u>.

2. How does this Privacy Policy apply?

This Privacy Policy describes what we do with personal information that we collect and use for our own purposes (i.e., where we are a controller), such as your account information and information about how you use and interact with our Services, including information you submit to our customer support as well as certain information relating to End Users. This Privacy Policy does not apply to personal information of our employees or job applicants (except to the extent employees or job applicants are Users).

We use cookies and similar technologies. Our <u>Cookie Policy</u> describes what we do in that regard.

We also host and process User Content on behalf of our Users. Our Users tell us what to do with User Content, and we follow their instructions.

3. Personal information we collect

We collect various personal information regarding you or your device. This includes the following:

- Information you provide to create an Account, specifically email address, first name and last name. If you sign up for Paid Services, we receive your payment information from our payment processor (such as the last four digits, the country of issuance and the expiration date of the payment card) the information is stored securely using Stripe payment processing services, and is not accessible by any party for any reason.
- Your marketing preferences.
- The emails and other communications that you send us or otherwise contribute, such as customer support enquiries or posts to our customer message boards or forums. Please be aware that information on public parts of our sites is available to others.
- Information you share with us in connection with surveys, contests or promotions.
- Information from your use of the Services. This includes: IP addresses, preferences, web
  pages you visited prior to coming to our or our Users' sites, information about your
  browser, network or device (such as browser type and version, operating system, internet
  service provider, preference settings, unique device IDs and language and other regional
  settings), information about how you interact with the Services and our Users' sites (such
  as timestamps, clicks, scrolling, browsing times, searches, transactions, referral pages,
  load times, and problems you may encounter, such as loading errors).

- Other information you submit to us directly or through Third Party Services if you use a Third Party Service to provide personal details (based on your privacy settings with such Third Party Service).
- 4. How we collect personal information

We obtain personal information from various sources. We do this in three main ways:

- You provide some of it directly (such as by registering for an Account).
- We record some of it automatically when you use our Services or Users' sites (including with technologies like cookies).
- We receive some of it from third parties via email or application (like when you register for pay for a service or when you make payments to us using our payment processor).

We've described this in more detail below.

a. Personal information you provide

When you use our Services, we collect information from you in a number of ways. For instance, we ask you to provide your name and email address to register and manage your Account. We also maintain your marketing preferences and the emails and other communications that you send us or otherwise contribute, such as customer support enquiries or posts to our customer message boards or forums. You might also provide us with information in other ways, including by responding to surveys, submitting a form or participating in contests or similar promotions.

Sometimes we require you to provide us with information for contractual or legal reasons. For example: (i) when you are making a purchase we collect data relating to your acceptance of the terms and conditions of service, forming an agreement of contractual service under those terms and conditions.

b. Personal information obtained from your use of our Services

When you use our Services, we keep details on file such as name, address, telephone number, email & services purchased, this information is used to engage with you in an on site service provision basis only, it is kept only for the duration of works.

If you are an End User, we also get information about your interactions with our site from Squarespace, our Web host and service provider, though Squarespace use this in anonymous, aggregated or pseudonymized form which does not focus on you individually. We and Squarespace use this data to evaluate, provide, protect or improve their Services (including by developing new products and services).

Some of this information is collected automatically using cookies and similar technologies when you use our Services and, 'cookies and similar technologies are used through the site (to properly provide the Services, such as for performance or security related reasons). Some of this information is similarly collected automatically through your browser or from your device.

c. Personal information obtained from other sources

If you sign up for Paid Services directly with us, we obtain limited information about your payment card from our payment processor, such as the last four digits, the country of issuance and the expiration date. Currently, our payment processor is Stripe. Stripe uses and processes your complete payment information in accordance with <u>Stripe's privacy policy</u>. This paragraph is not applicable if you sign up for Paid Services as an in-app purchase via a mobile app store. Please see <u>Google's privacy policy</u> and <u>Apple's privacy policy</u> for information about how they use and process your payment information.

5. How we use your personal information

We use the personal information we obtain about you for the following purposes:

- Provision of the Services. Create and manage your Account, provide and personalise our Services, undertake paid for services, process payments and respond to your enquiries.
- Communicating with you. Communicate with you, including by sending you emails about your transactions and Service-related announcements.
- Surveys and contests. Administer surveys, contests and other promotions.

- Promotion. Promote our Services and send you tailored marketing communications about products, services, offers, programs and promotions of Snapshot Property inspection and our partners and measure the success of those campaigns. For example, we may send different marketing communications to you based on your subscription plan or what we think may interest you based on other information we hold about you.
- Advertising. Analyse your interactions with our Services and third parties' online services so we can tailor our advertising to what we think will interest you. For example, we may decide not to advertise our Services to you on a social media site if you already signed up for Paid Services or we may choose to serve you a particular advertisement based on your subscription plan or one off purchase, or what we think may interest you based on other information we hold about you.
- Improving our Services. Analyse and learn about how the Services are accessed and used, evaluate and improve our Services (including by developing new products and services and managing our communications) and monitor and measure the effectiveness of our advertising. We usually do this based on anonymous, pseudonymized or aggregated information which does not focus on you individually. For example, if we learn that most Users of Paid Services use a particular integration or feature, we might wish to expand on that integration or feature.
- Security. Ensure the security and integrity of our Services.
- Third party relationships. Manage our vendor and partner relationships.
- Enforcement. Enforce our <u>Terms of Service</u> and other legal terms and policies.
- Protection. Protect our and others' interests, rights and property.
- Complying with law. Comply with applicable legal requirements, such as tax and other government regulations and industry standards, contracts and legal enforcement requests.

We process your personal information for the above purposes when:

- Consent. You have consented to the use of your personal information in a particular way.
   When you consent, you can change your mind at any time.
- Performance of a contract. We need your personal information to provide you with services and products requested by you, or to respond to your enquiries. In other words, so we can perform our contract with you or take steps at your request before entering into one. For example, we need your telephone number & email address so we can communicate with you for services uptake.

- Legal obligation. We have a legal obligation to use your personal information, such as to comply with applicable tax and other government regulations or to comply with a court order or binding law enforcement request.
- Legitimate interests. We have a legitimate interest in using your personal information. In particular, we have a legitimate interest in the following cases:
  - To operate the Snapshot Property Inspection business and provide you with tailored services and to use photographs obtained from your property in developing and promoting our business
  - To analyse and improve the safety and security of our Services we do this as it is necessary to pursue our legitimate interests in ensuring Snapshot Property Services is secure, such as by implementing and enhancing security measures and protections and protecting against fraud, spam and abuse.
  - To provide and improve the Services, including any personalised services we do this as it is necessary to pursue our legitimate interests of providing an innovative and tailored offering to our Users on a sustained basis.
  - To share your personal information with other Snapshot Property Inspection affiliates that help us provide and improve the Services.
  - To anonymise and subsequently use anonymised information.
- Protecting you and others. To protect your vital interests, or those of others.
- Others' legitimate interests. Where necessary for the purposes of a third party's legitimate interests, such as our partners who have a legitimate interest in delivering tailored advertising to you and monitoring and measuring its effectiveness or our Users who have a legitimate interest in having their sites function properly and securely and analysing the usage of their sites so they can understand trends and improve their services.
- 6. How we share your personal information

We share personal information in the following ways:

- Affiliates. We share personal information with our affiliates when it is reasonably necessary
  or desirable, such as to help provide services to you or analyse and improve the services
  we or they provide.
- Business partners. We may share personal information with business partners. For example, we may share your personal information when our Services are integrated with their Third Party Services, but only when you have been informed or would otherwise expect such sharing.
- Third Party Plugins and Social Networks. We may share personal information with website plugins, social media platforms or similar Third Party Services to improve your experience, at your direction, or when you intentionally interact with the plug-in. For example, when you use a Third Party Service to create or log in to your Account, we may share your personal information with that Third Party Service.
- Service providers. We share personal information with our service providers that perform services on our behalf. For example, we may use third parties to help us provide customer support, manage our advertisements on other sites, send marketing and other communications on our behalf or assist with data storage.
- Process payments. We transmit your personal information via an encrypted connection to our payment processor.
- Following the law or protecting rights and interests. We disclose your personal information
  if we determine that such disclosure is reasonably necessary to comply with the law,
  protect our or others' rights, property or interests (such as enforcing our <u>Terms of Service</u>)
  or prevent fraud or abuse of Snapshot Property Inspection or our Users. In particular, we
  may disclose your personal information in response to lawful requests by public
  authorities, such as to meet national security or law enforcement requirements.
- Advertising. We share personal information with third parties so they and we can provide you with tailored advertising and measure and monitor its effectiveness. For example, we may share your pseudonymised email address with a third party social media platform on
- Business transfers. If we're involved in a reorganisation, merger, acquisition or sale of some or all of our assets, your personal information may be transferred as part of that deal or the negotiation of contemplated deals.
- 7. Your rights and choices

Where applicable law requires (and subject to any relevant exceptions under law), you may have the right to access, update, change or delete personal information.

You can access, update, change or delete personal information either directly in your Account or by contacting us at <u>Contact@snapshotpi.co.uk</u> to request the required changes. You can exercise your other rights (including deleting your details) by contacting us at the same email address. Please note that we may need to verify your identity in connection with your requests, and such verification process may, require you to provide us with additional information (e.g., government identification). Even if you have access to your Account, we may request additional information if we believe it's necessary to verify your identity. If we are unable to verify your identity or request, we may not, in accordance with applicable law, be able to fulfil your request.

You can also elect not to receive marketing communications by changing your preferences in your Account or by following the unsubscribe instructions in such communications.

Please note that, for technical reasons, there is likely to be a delay in deleting your personal information from our systems when you ask us to delete it. We also will retain personal information in order to comply with the law, protect our and others' rights, resolve disputes or enforce our legal terms or policies, to the extent permitted under applicable law.

You may have the right to restrict or object to the processing of your personal information or to exercise a right to data portability under applicable law. You also may have the right to lodge a complaint with a competent supervisory authority, subject to applicable law. If you are subject to EU data protection laws, we suggest you lodge any such complaints with our lead supervisory authority:

## ICO Scotland contact details

The Information Commissioner's Office - Scotland 45 Melville Street Edinburgh EH3 7HL

Telephone: 0303 123 1115

Email: Scotland@ico.org.uk

Additionally, if we rely on consent for the processing of your personal information, you have the right to withdraw it at any time and free of charge. When you do so, this will not affect the lawfulness of the processing before your consent withdrawal. Our <u>Cookie Policy</u> explains how you can manage cookies and similar technologies.

## 8. How we protect your personal information

While no service is completely secure, our Web host Squarespace has a security team dedicated to keeping personal information safe. Squarespace maintain administrative, technical and physical safeguards that are intended to appropriately protect against accidental or unlawful destruction, accidental loss, unauthorised alteration, unauthorised disclosure or access, misuse and any other unlawful form of processing, of the personal information in our possession. Our Host & Service Provider "Squarespace" employ security measures such as using firewalls to protect against intruders, building redundancies throughout their network (so that if one server goes down, another can cover for it) and testing for and protecting against network vulnerabilities.

#### 9. How we retain your personal information

We retain personal information regarding you or your use of the Services for as long as your Account is active or for as long as needed to provide you with the Services. We also retain personal information for as long as necessary to achieve the purposes described in this Privacy Policy, for example, to comply with our legal obligations, to protect us in the event of disputes and to enforce our agreements and to protect our and others' interests.

The precise periods for which we keep your personal information vary depending on the nature of the information and why we need it. Factors we consider in determining these periods include the minimum required retention period prescribed by law or recommended as best practice, the period during which a claim can be made with respect to an agreement or other matter, whether the personal information has been aggregated or pseudonymised, and other relevant criteria. For example, the period we keep your email address is connected to how long your Account is active, while the period for which we keep a support message is based on how long has passed since the last submission in the thread.

You may delete your information by contacting us at <u>Contact@SnapshotPl.co.uk</u> and Snapshot Property Services will delete the personal information it holds about you (unless we need to retain it for the purposes set out in this Privacy Policy). Please note that in the course of providing the Services, we collect and maintain aggregated, anonymized or de-personalized information which we may retain indefinitely.

## 10. Data transfers

Personal information that you submit through the Services may be transferred to countries other than where you live, such as, for example, to third party host provider servers in the U.S. We also store personal information locally on the devices you use to access the Services.

Your personal information may be transferred to countries that do not have the same data protection laws as the country in which you initially provided the information.

We rely upon a number of means to transfer personal information which is subject to the European General Data Protection Regulation ("GDPR") in accordance with Chapter V of the GDPR. These include:

- Privacy Shield. We transfer, in accordance with Article 45 of the GDPR, personal information to companies that have certified their compliance with the EU-U.S. or Swiss-U.S. Privacy Shield Frameworks (each individually and jointly, the "Privacy Shield"), including our host & service provider Squarespace, Inc.
- Standard data protection clauses. We may, in accordance with Article 46 of the GDPR, transfer personal information to recipients that have entered into the European Commission approved contract for the transfer of personal data outside the European Economic Area.
- Other means. We may, in accordance with Articles 45 and 46 of the GDPR, transfer personal information to recipients that are in a country the European Commission or a European data protection supervisory authority has confirmed, by decision, offers an adequate level of data protection, pursuant to an approved certification mechanism or code of conduct, together with binding enforcement commitments from the recipient to apply the appropriate safeguards, including as regards data subjects' rights, or to processors which have committed to comply with binding corporate rules.

You can find out more information about these transfer mechanisms here.

11. Privacy Shield

Our host & internet service provider Squarespace, Inc. has certified its compliance to the Privacy Shield.

Our Host & Internet provider Squarespace is committed to treating personal information received from the European Economic Area, Switzerland and the United Kingdom pursuant to the Privacy Shield Frameworks in accordance with the applicable Principles. you can learn more about the Frameworks and Principles by visiting <u>https://www.privacyshield.gov/</u>.

Our accountability for personal information we receive under the Privacy Shield and subsequently transfer to a third party is described in the Privacy Shield Principles. In particular, we may use third parties to process data on our behalf as described in this Privacy Policy, and we remain liable if they do so in a manner inconsistent with the Privacy Shield Principles, unless we prove that we are not responsible for the event giving rise to the damage.

If you have a question or complaint you believe to be within the scope of our Privacy Shield certification, please contact us first at Contact@snapshotpi.co.uk, or using the contact details in the "About Us" section of the website. We'll respond within 45 days. For any complaints that we can't resolve directly, you should contact the information commissioner on the details provided above.

If your concern still isn't addressed by the ICO you may be entitled to a binding arbitration under the Privacy Shield Principles. For purposes of enforcing compliance with the Privacy Shield, Snapshot Property Inspection, is subject to the investigatory and enforcement authority of the UK ICO Commissioner.

## 12. End Users' personal information

Our customers data forwarded to us when we collect information from you such as address, email address and payment information so that you can complete orders. we also use cookies and similar technologies to analyse usage and other trends.

We comply with relevant laws and regulations that apply to your collection and use of your information, including personal information collected about our users from our host and service Provider "Squarespace" or cookies or similar technologies.

# 13. Updates to this Privacy Policy

We'll update this Privacy Policy from time to time to reflect changes in technology, law, our business operations or any other reason we determine is necessary or appropriate. When we make changes, we'll update the "Effective Date" at the top of the Privacy Policy and post it on our site. If we make material changes to it or the ways we process personal information, we'll notify you (by, for example, prominently posting a notice of the changes on our site before they take effect or directly sending you a notification where you are subscribed to services).

We encourage you to check back periodically to review this Privacy Policy for any changes since your last visit. This will help ensure you better understand your relationship with us, including the ways we process your personal information.

15. Who is Snapshot Property Inspection

When we say "Snapshot Property Inspection" (or "we", "us" or "our"), we mean: (a) Snapshot Property Inspection.

16. How to contact us

If you have questions, comments or complaints about this Privacy Policy or our privacy practices or if you would like to exercise your rights and choices, please email us at <u>Contact@SnapshotPl.co.uk</u>, or write to us at the addresses below:

If you are a resident of or have your principal place of business anywhere other than the US:

Snapshot Property Inspection Ltd

272 Bath Street

Glasgow

G2 4JR