

PRIVACY AND COOKIES POLICY

Version number: [1.0]

Effective date: [02/07/2020]

1. Who are we?

1.1 We are Jonathan and Chiang Limited trading as “Toke”. For privacy queries, you can contact us at admin@toke.world. Other contact details are on our website.

2. What’s the point of this policy?

2.1 It tells you what to expect when we collect your personal information via our website or app. Please only use our service if you are completely happy with this policy.

2.2 Generally, the policy covers only information provided to us. If you give personal information to other people, such as payment providers or other websites, please check their privacy policies.

3. Might the policy change?

3.1 Yes. We will post any new version on our website (please check whenever you visit the site) and also notify you by email, SMS, in-app message or otherwise. We will assume you agree to the new version of the policy if you use our site or app after its effective date.

4. What do we collect?

4.1 Information which you upload to our service or otherwise give us such as:

4.2 your name and contact details;

4.3 details about your transactions on our service;

4.4 information included in your listings or reviews or which you otherwise display on our service or which you include in messages sent via our service and/or communications with us; and

4.5 contact or other information which you give or allow us to use for newsletters or other marketing.

4.2 Automated information about your use of our service such as: the internet protocol (IP) address used to connect your device to the internet, connection information such as browser type and version, information about your device including device-type and device identifier, operating system and platform, mobile network data, a unique reference number linked to the data you enter on our system, login details, the site from which you arrived at our service, details of your activity with date / time stamps including pages you visited and your searches / transactions.

4.3 If you use the location-related services in the app: Information about your geo-location You consent to your data being used for this purpose.

4.4 The following information about you may be provided to us by other people:

- Limited billing information sent to us by our payment provider or the relevant app store for verification purposes e.g., your name, email address and billing / delivery addresses.

5. What's our reason / legal basis for collecting the information?

- 5.1 Because it's necessary to take steps at your request to enter into a contract with you and/or to perform such a contract, e.g., send service messages, process payments and fulfil orders. This applies to initial enquiries and to contact and transaction details as well as to location information, listings and reviews.
- 5.2 Because it's in our "legitimate interests", e.g., to manage and improve our service including tracking usage patterns and preventing or detecting fraud or abuse. This applies to automated usage data.
- 5.3 Because you've specifically agreed on our service (e.g, by ticking a consent box). This applies to contact or other information which you give or allow us to use for newsletters or other marketing. You can withdraw permission at any time as explained on our service or by emailing us at the above email address.

6. How long do we keep personal information?

- 6.1 Until your account is closed or our contract with you has otherwise ended. You can close your account by emailing us at the above email address.
- 6.2 We may hold on to some of your information for longer (typically up to six years) if reasonably needed for legal, regulatory or tax reasons, deal with disputes, prevent fraud or abuse and/or enforce our terms and conditions.
- 6.3 We will keep your information which we use only for newsletters or other marketing until you tell us to stop sending you such messages.

7. To whom do we send or make available your personal information?

- 7.1 To other people who supply us with a service, e.g. hosts, payment providers, and businesses which help us send communications or monitor our website and which provide us with e-commerce and other IT services.
- 7.2 To other users of our service, if you display personal information such as your real name in a listing, review or other public action on our service or if you pass it to another user eg to facilitate an exchange.
- 7.3 We use your address or location to enable display of your listing to other users who are within a certain distance of you. We do not display your exact address or pass it on to other users.
- 7.4 To regulators, the police and other law enforcement authorities to help deal with fraud and abuse and/or comply with legal requirements.
- 7.5 To insurers and professional advisers in connection with our insurance cover or to deal with legal claims.
- 7.6 To potential buyers so far as reasonably necessary, in the case of an actual or proposed (including negotiations for a) sale or merger or business combination involving all or the relevant part of our business.

8. Do we send your information outside the UK?

8.1 Your personal information which we collect is stored within the UK and is not transferred to any third countries except as follows.

8.2 Your personal information may be transferred to the US by the following companies certified under the [EU-US Privacy Shield Framework](#), which provides certain safeguards for your personal information: Google (app admin). Your personal information may also be transferred to the US by Apple (for app admin) on the basis of a contract which contains certain EU-adopted standard transfer clauses designed to provide adequate safeguards for your personal information.

9. What rights do you have?

9.1 If the legal requirements are met: To ask us for access to your personal information, to rectify it if there are mistakes, to delete or restrict its use in certain circumstances or to “data portability” or to withdraw any consent you’ve given (e.g. marketing).

9.2 You may also have the right to object to use of your personal information in certain circumstances.

9.3 If you have a complaint about how we are dealing with your personal information, please contact us via the email address above. If you are not happy with our response or think we are not handling your personal information in accordance with the law, you have the right to complain to the Information Commissioner’s Office (ICO).

9.4 For more information about your rights, visit the ICO’s website: www.ico.org.uk.