

# 1. Summarise

This Privacy Policy (or privacy notice) is published by These Modern Times Limited (TMT) as the operator of Surprise Me to inform you about how we collect, use, disclose and store personal information. We believe transparency is essential, but providing that transparency requires us to make this notice lengthier than usual.

That is why we summarized the important points at the top. We have made the full notice as easy as we could, but we are happy to answer any questions you may have (see Contact Us).

## 2. Important points of this notice

Customers of our Partners – We may obtain your personal information when we provide services to our Partners.

Partners – Our Partners are retail outlets and businesses making Surprise Me available to their customers. Most information we collected about our Partners is business information, not personal information. We use any personal information collected to support and better understand our partners and provide and improve our services.

Website / Support Service customers – We collect personal information you provide directly, such as your contact information, and information collected through cookies and similar tools. We use this to provide the website, support and better understand our customers and provide and improve our services.

Employees / Contractors / Applicants – If you apply for a job with TMT , we use your personal information to consider employing you. If we employ you, we will use your personal information in connection with your employment. A separate privacy notice may apply to employees.

## 3. Application of this notice

### What This Notice Covers

This notice applies to all personal information that we collect, use, disclose and store when you access Surprise Me or apply for a job with TMT. Our service includes a terminal which allows customers to insert their email address to receive their vouchers onto their email inbox should they win a cashback or other promotions.

### What This Notice Does Not Cover:

Partners: As mentioned above, we process personal information for others, including our Partners.

Non-Personal Information: Information about your business, including your business contact information is not typically personal information. Anonymised information is also not considered personal information for the purposes of this notice. We may anonymise any personal information in our custody, in which case it will cease to be personal information.

In some situations, we may rely on exemptions or other permitted conduct under applicable laws, including to collect, use, disclose or store personal information for purposes not described in this notice. We provide services to partners in many jurisdictions and privacy practices may be adopted to address the specific privacy requirements of particular jurisdictions. [Contact Us](#) if you are unsure if or how this notice applies to you.

## 4. Changes to this notice

Please note that we may update this notice from time to time to reflect changes in our privacy practices by providing you with notice of the changes. Notice includes but is not restricted to posting a link to the new notice, posting a new notice at Surprise Me/privacy-policy, or sending you a link to the new notice via contact information you have provided to us. Such changes will be effective with respect to your use of Surprise Me's solution after Surprise Me has given notice of the changes.

Please review this notice periodically to see whether it has been updated. Any use of Surprise Me's services by you after we provide notice constitutes your acceptance of those changes.

## 5. Processing of personal information

Much of the personal information we process is necessary to provide our services and meet our contractual obligations. In most other situations, we rely on our legitimate interest (which, in some countries, would be "implied consent" or a legal exception to the consent requirement, such as where the processing is to prevent fraud). The specific purposes for which we process personal information include to:

- communicate with you
- track and process your budget and report back to you as appropriate
- administer, manage, test and improve our solution
- better understand the services, such as through reporting and analytics

- deliver content and information to third parties including other partners and their customers
- market and advertise our solution
- fulfil any other purpose that would be reasonably apparent to the average person at the time of collection

While not stated as a purpose below, we may also use any personal information:

- For security purposes, including to detect, prevent and investigate potential fraud
- Where required or permitted by law

We may also request express consent to process your personal information in some circumstances, such as when you sign up as a partner or a customer for a partner or when you visit our website and we use cookies. We may also de-personalize information, such as through anonymization or aggregation. We may use and disclose such information for any purpose, as it will no longer identify you or any other person.

## 6. Sharing your personal information

We do not sell your personal information to third parties (as "sell" is defined in EU law). A "sale" would not include a situation where someone is buying all or part of our business (as is explained further below).

We may share your personal information with our employees, contractors, consultants and other parties such as affiliates and third-party companies that assist us in providing our services, including marketers, customer support and hosting services. Below is a non-exhaustive list of the third parties that may have access to personal information under our control.

Marketers: Provide you with news and marketing, including customizing our advertisements

Customer Support: Track your service issues and improve our services; provide answers and solutions to your queries and concerns

Hosting and Similar Service Providers: Help us provide our services

E-commerce Platforms and Partners: Help us provide our services

Analytics: Tracking your use of our solution to improve our services

When we disclose your personal information, we cease to control it, and the recipient's policies and procedures will apply. Where required by law, we will obtain your consent before disclosure.

#### Partners

We may provide specific analytics data and information about your use of Surprise Me services to our Partners.

#### Third Parties Acquiring or Proposing to Acquire Surprise Me

Where third parties acquire or propose to acquire all or a substantial part of our operations or any of our affiliates or subsidiaries, including by merger or acquisition, amalgamation, corporate reorganisation or restructuring or a sale of assets, including as part of the related due diligence.

#### Law Enforcement / Legal Proceedings

Where we believe release is appropriate to comply with applicable laws or regulations, enforce our policies, or protect our or others' rights, property or for safety.

## 7. Other questions

Depending on where you are located and subject to applicable laws, you may have the right to request to access, correct or erase your personal information, object to our processing of your personal information, requests restriction of your personal information in our control or withdraw or change your consent to how we process your personal information, by contacting our Privacy Officer ([Contact Us](#)).

As a security measure, our Privacy Officer may request specific information from you in order to verify your identity prior to granting any requests. If we cannot respond to your request promptly or have to refuse the request, we will advise you of the reasons, subject to any legal restrictions. If you disagree with our determination, you may complain to us and we will reconsider. If you are not satisfied with our ultimate determination, you may contact your local data protection authority or privacy commissioner. In addition, the personal information may have been destroyed, erased or made anonymous in accordance with our record retention obligations and practices.

Where permitted by law, we may refuse or charge a fee for repeat, abusive or inappropriate requests.

## 8. Retaining your personal information

We only store personal information as long as necessary to fulfil the purposes for which the personal information was collected, to conduct our business operations and maintain an appropriate historical record of our relationship with you, or in order to comply with applicable laws, whichever is longer, after which time the personal information is destroyed or erased. We may, instead of destroying or erasing your

personal information, make it anonymous such that it cannot be associated with, or tracked back to, you.

## 9. Securing your personal information

We take steps to maintain physical, technical and procedural safeguards that are appropriate to the sensitivity of your personal information. These safeguards are intended to prevent your personal information from loss and unauthorized access, copying, use, modification or disclosure. However, the internet is not a secure environment and no computer system is perfectly secure. As such, we cannot guarantee the security of personal information provided to us through electronic means: there is always a risk that your personal information may be accessed or used without authorization.

## 10. Other questions

### Will We Use Your Personal Information to Contact You?

Surprise Me and its Partners may use your personal information to send you emails periodically listing promotions or events relating to Shop4Free. You may opt-out of receiving such promotional emails by sending an email to [support@surprizeme.shop](mailto:support@surprizeme.shop) or following the instructions in such correspondence. Once Surprise Me has processed your opt-out request, we will no longer send you promotional emails unless you opt back in to receiving such communications. Surprise Me does not control mailing lists maintained by Partners.

### What personal information do we collect from third parties?

We may collect personal information about you from a third party. In such cases, the third party providing that personal information to us is responsible for obtaining your consent or another lawful basis for such disclosure.

For example, if you provide your personal information to a Surprise Me Partner when using Surprise Me, that personal information may be collected by us, or other third. The collection, use, disclosure and storage of such information will be subject to the privacy policies of the Surprise Me Partners. We recommend that you review the privacy policies of those Surprise Me customers prior to providing any personal information.

### Do We Collect Personal Information About Third Parties from You?

You may have the opportunity to communicate with others that use Surprise Me, such as by sending an invitation to a third party. If you choose to take advantage of this

functionality, we may ask you to provide us with certain information about the person with whom you wish to communicate, such as their name and email address. By providing us with this information, you confirm that you have obtained their consent to collect, use and disclose their personal information in this manner.

We collect such information for the purposes of facilitating the requested communication, which may contain a specific promotional message from you. Unless we explicitly say otherwise, we will not use this personal information for other marketing purposes without first obtaining consent from the subject of the personal information. Please be aware that when you use any invitation functionality on the services, your email address, name or username and message may be included in the communication sent to you.

#### What Personal information Do Third Parties Collect from Us?

As a convenience to you, Surprise Me customers' services may contain links to third-party websites, applications or services, or integrate with other third-party platforms that collect personal information from you. Such third-party services may include payment processors that collect personal information to facilitate your purchase of certain services. While we try to link only to third-party services that share our commitment to protecting your privacy, we are not responsible for the privacy practices or content of third-party services. We recommend that you review the privacy policies of those third-party services prior to use.