

**Privacy & Cookie Policy**  
**GlobalGreenland Transact Ltd t/a ChatNearby**

**1. What is a Privacy Policy?**

- 1.1. A Privacy Policy explains how we collect, use, and share your personal information when you use the ChatNearby App. We are registered with the ICO. If you have any questions about this privacy policy, please feel free to contact us at [support@chatnearbyapp.com](mailto:support@chatnearbyapp.com)

**2. Who are we?**

- 2.1. We, GlobalGreenland Transact LTD t/a ChatNearby, registration number 16258197, are located at 1 Ward Place, Appt 2101, Bagshaw Building, E14 9DU, London, England and we have made this Privacy Policy to explain how and why we process your personal data when you use our App. We are registered with the ICO, registration number C1665180.
- 2.2. If you have any questions about this Privacy Policy, you can contact us via email at [support@chatnearbyapp.com](mailto:support@chatnearbyapp.com).
- 2.3. We are a Data Controller when we deal with the personal data of our App users. We also work with professional partners who are Data Controllers themselves. This means that we take responsibility and great care for the personal data we handle about you.
- 2.4. Our App is not meant for anyone under 18, and we do not knowingly collect data about children.

**3. Information we collect about you**

Category of data	In more detail
Identity and account data you input into the app Registration is mandatory in order to use the app	<ul style="list-style-type: none"><li>• your name, and contact information, including email address and telephone number</li><li>• information to check and verify your identity, e.g. date of birth</li><li>• your gender</li><li>• your sexual orientation. We only collect special category data where users voluntarily provide it, and we process it with explicit consent under Article 9(2)(a) of the UK GDPR.</li><li>• your image</li><li>• your account details, such as username and password</li><li>• your replies to security questions</li><li>• your language preferences</li><li>• your bio about yourself</li></ul>
Data collected when you use specific functions in the app	<ul style="list-style-type: none"><li>• data you store online with us using the app including (while such data may not always be protected by the UK GDPR we will assume it is and treat it in accordance with this policy)</li></ul>
Data collected when you permit the collection of location data	<ul style="list-style-type: none"><li>• details of your general location</li><li>• your image via your camera</li></ul>

Category of data	In more detail
Other data the app collects automatically when you use it	<ul style="list-style-type: none"> <li>• your activities on, and use of, the app which reveal your preferences, interests or manner of use of the app and the times of use</li> <li>• IP address, device type, IMEA numbers, MAC address of networks, other unique device identification, device operating system, browser type, mobile network information, app version number, storage usage, data usage, time zone settings etc</li> </ul>

#### 4. Legal Basis for Processing Your Personal Data

Purpose	Type of Personal Data	Legal Basis (UK GDPR)
Create and manage your account	Name, email, date of birth, password	Contract
Match and connect you with other users	Location, profile info, preferences	Legitimate Interests / Consent
Display your profile to others	Photos, bio, preferences	Consent
Provide customer support	Email, message history	Legitimate Interests
Send service messages and updates	Email, device ID	Contract / Legitimate Interests
Send marketing communications (optional)	Email, push notification ID	Consent (you can withdraw at any time)
Monitor and enforce content standards	Message content, images, reports	Legitimate Interests / Legal Obligation
Improve app performance and user experience	Usage data, device info, diagnostics	Legitimate Interests
Comply with legal or regulatory requirements	Any data required by law	Legal Obligation
Process special category data (e.g. orientation)	Gender identity, sexual orientation (if provided)	Explicit Consent (Article 9(2) (a))

#### 5. What are your rights?

- 5.1. You have various rights that you can use (at no cost to you). In some situations, we may charge a reasonable fee if your requests are unreasonable or excessive.
- 5.2. You have the right:
- Right of access:** You can ask for a copy of the personal data that we have about you as well as the reasons and methods for how we use your data. This is often called a 'Data Subject Access Request'.
  - Right to rectification:** You can ask us to update or complete any personal data we have about you that is incorrect or incomplete.
  - Right to be forgotten/deletion:** You have a right, under some circumstances, to ask us to delete any personal data we have about you. Please note that there may be situations where we have to keep your personal data after a request for erasure where we have a legal basis for doing so.

- (d) **Right of restriction:** You can ask us to stop processing your personal data where you have challenged our use of it, and we have no legal basis to continue processing your personal data.
- (e) **Right to data portability:** In some circumstances, you can ask us to transfer the data we have about you to another. This would be sent in a standard, widely used, electronic format.
- (f) **Right to object:** You can object to us using your personal data for specific purposes, for example, direct marketing.
- (g) **Automated decision making:** You have a right to avoid automated decision making and profiling in some circumstances.

5.3. For more details about these rights in the UK and when you can request them, please visit the Information Commissioners Guide to [Data Subject Rights](#).

5.4. If you want to exercise any of these rights, please contact us at [support@chatnearbyapp.com](mailto:support@chatnearbyapp.com) . We will reply to you within one month. If your request is complex and we need more time, we will contact you and let you know within the first month.

## 6. How can you contact us with questions or issues?

6.1. We always welcome your questions about privacy. Please email us at [support@chatnearbyapp.com](mailto:support@chatnearbyapp.com) . If you have an issue, please reach out to us so that we can address any concerns. You also have a right to file a complaint with the Information Commissioners Office if you think your personal data has been handled in a way that does not follow Data Protection Legislation. You can phone the ICO helpline on 0303 123 1113 or visit their website [here](#).

## 7. More details about our organisation and this privacy policy.

7.1. If we sell or transfer our assets to another party, your personal data could be part of the transferred assets. If your personal data is transferred, it will still be subject to this Privacy Notice. Your personal data will be handed over to a successor in the case of a liquidation or administration. We will let you know beforehand if there are any changes.

## 8. How do we use your personal data?

8.1. We need to use some of your personal data to deliver our service to you, but we only collect what is necessary. We have explained below the different ways that we use your personal data. Please choose the section that matches your relationship with our organisation to learn more.

## 9. Third Party services

We may have links on our App to other websites that are not under our control. We don't endorse or guarantee the actions, policies or content of those services and advise that you look at their privacy policies to decide if you want to keep browsing.

## 10. How long do we store your personal data?

We will store your data until you stop using our App and cancel your App subscription through the App Store.

## 11. Who do we share your personal data with?

11.1. We share your personal data with various organisations so that we can run our business and to fulfil our legal obligations. We only share your personal data where necessary or required by law.

11.2. Your personal data is shared with different organisations for us to operate our business and to comply with our legal duties. We only share your personal data when it is essential, or

- 11.3. Depending on your relationship with us, some of your personal data will be accessible to different organisations that we work with. These include accountants, software systems such as customer relationship management solutions, authentication, and subscription platforms.
- 11.4. We make sure that our systems are secure, and we will only disclose your data to organisations who have proper protection measures in place such as Standard Contractual Clauses. We have Data Processing Agreements with our Data Processors and never trade personal data to third parties.

## 12. Who we share your information with and why (detail):

Recipient	Processing operation (use) by recipient	Relevant categories of your information transferred to recipient
<b>Bubble Group, Inc.</b> of 1811 Silverside Road, Wilmington, New Castle County, Delaware 19801.	Web and data hosting services, stores a copy of your information on computer equipment so it can be accessed by us and permitted third parties (see below) online.	Any/all of your information we collect.
<b>Amazon Web Services, Inc.</b> , a Delaware corporation.	Web and data hosting services, stores a copy of your information on computer equipment so it can be accessed by us and permitted third parties (see below) online.	Any/all of your information we collect.

## 13. Transferring your information out of the UK

- 13.1. For UK users, countries outside the UK have differing data protection laws, some of which may provide lower levels of protection of privacy. It is sometimes necessary for us to transfer your information to countries outside the UK for instance to our cloud service provider, Bubble.io, located in the United States. Bubble.io is certified under the EU-US Data Privacy Framework (DPF) and the UK Extension to the DPF, which means it is deemed to provide an adequate level of protection for UK and EU personal data under Article 45 of the UK GDPR.
- 13.2. As a result, data transfers to Bubble.io do not require additional safeguards such as Standard Contractual Clauses (SCCs). More information about Bubble.io's DPF certification can be found at <https://bubble.io/privacy> and their cookie policy at <https://manual.bubble.io/help-guides/data/user-accounts/cookies-set-by-bubble>.
- 13.3. Under data protection laws, we can only transfer your information to a country outside the UK where:
- (a) the UK government has decided the particular country ensures an adequate level of protection of your information (known as an '**adequacy regulation**') further to Article 45 of the UK GDPR;
  - (b) there are appropriate safeguards in place, together with enforceable rights and effective legal remedies for you, or
  - (c) a specific exception applies under relevant data protection law

(d) We transfer your information outside the UK to the following countries based on adequacy regulations: USA.

13.4. In the event we cannot or choose not to continue to rely on either of those mechanisms at any time, we will not transfer your information outside the UK unless we can do so on the basis of an alternative mechanism or exception provided by UK data protection law.

13.5. Any changes to the destinations to which we send your information or in the transfer mechanisms we use to transfer your information internationally will be notified to you.

## 14. Cookies

14.1. What are cookies? Cookies are small files stored on your device by your browser or app. They allow us to recognise you, keep you logged in, save your preferences, and analyse how users interact with our service.

14.2. Our app uses cookies and similar technologies that gather different kinds of personal data. This will include information about your visits to our app; pages viewed, downloads, navigation, and exit; IP address; location; browser type and version; operating system; source of referral; duration of your visit.

14.3. Some of these cookies are essential to make sure that the app functions properly, and other cookies need your consent.

14.4. When required by law (e.g UK, EU, EEA) we will request your consent before setting non-essential cookies. You may manage and withdraw consent by changing your device or browser settings.

14.5. We use two broad categories of Cookies: (1) first party Cookies, served directly by us to your mobile device, which are used only by us to recognise your mobile device when it revisits the Bubble Service; and (2) third party Cookies, which are served by service providers on the Bubble Service, and can be used by such service providers to recognise your computer or mobile device when it visits other websites.

14.6. We use Cookies to verify that you are properly signed in, to display information for your primary location. We may also use Cookies from time to time to measure your response to new aspects in an effort to continually improve customer service. Please be aware that a Cookie cannot spread computer viruses, retrieve any other data from your hard drive, or capture your email address.

### 14.7. Cookies we use

We use cookies set by our platform provider (Bubble). They are our third-party provider and you can find their full Cookie policy here: <https://manual.bubble.io/help-guides/data/user-accounts/cookies-set-by-bubble>. These may include:

Cookie Type	Description	Purpose	Set By
Essential Cookies: Session Cookies & Security Cookies	Essential to provide services and enable features such as help prevent fraud and ensure safe login.	Allow login to secure areas, help content load quickly and keep session integrity. Ensure security of use.	Set by Bubble
Functionality Cookies: User Identifier	Remember choices made when using Services	Provide a personal experience, avoid re-entering preferences	Set by Bubble

Analytics and Performance Cookies	Collect information about traffic and usage to analyse how users interact with the app (e.g Google Analytics)	Operate Services efficiently, gather demographic info, monitor activity	Set by Third Party such as Google.
Chat Technologies	Employ cookies and software code for chat features	Access and use information shared through online chats	Set by Bubble

14.8. **Our use of Cookies:** Cookies on our App are used for many purposes including, but not limited to:

- (a) enabling You to register on our App (be verified) where applicable and to have such details remembered for later to enable you to use the subscriber login.
- (b) enabling You to use our Services on the App.
- (c) recognising Your device when You visit our App.
- (d) improving our App's usability.
- (e) analysing the use of our Services.
- (f) administrating our App.
- (g) preventing fraud and improving the security of our App; and,
- (h) to analyse the use of our Services through analytics software.

#### 14.9. **Third-Party Cookies**

Some plugins or analytics tools you choose to enable (e.g Google Analytics, Meta Pixel) may set additional cookies. These are not controlled by us directly and we recommend reviewing their privacy policies separately.

#### 14.10. **Do you want to learn more about cookies?**

- (a) More information about cookies can be found at: <http://www.allaboutcookies.org>
- (b) Internet Advertising Bureau: Guide to online advertising and privacy
- (c) International Chamber of Commerce United Kingdom: ICC UK cookie guide
- (d) For further information about the cookies We use, please contact us at [support@chatnearbyapp.com](mailto:support@chatnearbyapp.com)