

# FreeHour

## Mobile Application Privacy Policy

PLEASE READ THIS PRIVACY POLICY CAREFULLY BEFORE USING THE APPLICATION

FreeHour Limited (Name; “we”, “us” or “our”) are committed to protecting and respecting your privacy. For the purposes of the GDPR, “we”, as controllers, refers to FreeHour Limited (C 82326) of 10, Triq ic-Citru, Attard Malta, ATD 2050. Should you wish to contact us and ask us about this policy, you may do so on [hello@freehour.eu](mailto:hello@freehour.eu) or alternatively, at FreeHour Limited, 10, Triq ic-Citru, Attard, Malta ATD 2050.

### Scope of Policy

This privacy policy (the “Privacy Policy”) (together with our Terms and Conditions of Use for End-Users (the “T&Cs”)) applies to your use of:

- the FreeHour application software (the “App”) available on the App Store and Google play (the “App Site”), once you have downloaded a copy of the App onto your mobile telephone or handheld device (“Device”); and/or
  - any of the services accessible through the App and which may be introduced on the App from time to time (the “Services”).
- The Privacy Policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

### **1. Purpose and Legal Basis for Processing**

In order for us to provide you with our service, we require certain personal data from you. We require your personal data because:

1. It is necessary for us to comply with certain legal obligations which we are subject to, and;
2. It is necessary for the purposes of providing you our service through our App.

In order to use FreeHour, we need you to create an account. When you sign up, we will ask for some information such as name, email address, phone number and school details. We need this information to create your account, so that we can contact you about this account, so that you can access your details from anywhere, and also so that your friends are able to find you.

Therefore, providing us with this personal data is a requirement necessary to enter into a contract and be able to use the App and/or our Services. Failure to provide personal data will prohibit you from making use of the App and/or our Services.

If you do not wish to be bound by this Privacy Policy, please delete the App from the device/s on which it is being used, immediately and contact us at FreeHour Limited 10, Triq ic-Citru, Attard, Malta ATD2050 or on [hello@freehour.eu](mailto:hello@freehour.eu).

## **2. Information We Collect From You**

We will collect and process the following data about you:

**1. Information you give us (“Submitted Information”):** This is information you give us about you by filling in forms on the App or websites we operate or may operate from time to time (collectively, “Our Sites”), or by corresponding with us (for example, by e- mail or chat). It includes information you provide when you download or register to use the App, subscribe to any of our Services, search for the App or a Service, share data via the App’s social media functions, enter a competition, promotion or survey, search for job listings, and any other activities commonly carried out in connection with the App, and when you report a problem with the App, our Services, and any of Our Sites, including, but not limited to, Facebook pages. If you contact us, we will keep a record of that correspondence. The information you give us may include your name, address, e- mail address and phone number, the Device’s phone number, age, username, and other registration information.

**2. Information we collect about you and your Device:** Each time you visit Our Sites or use our App we will automatically collect the following information:

(a) technical information, including the type of mobile device or handheld device you use, a unique device identifier (for example the mobile phone number used by the Device), mobile network information, your mobile operating system, the type of mobile browser you use, and time zone setting (“Device Information”);

(b) information stored on your Device, including contact information, friends lists, login information, Facebook ID, educational timetables, area of study, school name, profile picture, or other digital content, and job listing search preferences (“Content Information”);

(c) calendars and calendar events imported from Google Calendar including access token provided by Google when you attempt to login using Google. Once logged in to Google, we will retrieve your Google Calendars and events from your selected calendars. This data is retrieved and used only for the purpose of creating a timetable that you can use within FreeHour (“Third Party Information”);

(d) details of your use of the App or any other applications we operate or may operate from time to time, or your visits to our App Site or any of Our Sites including, but not limited to traffic data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access (“Log Information”).

3. **Location information:** We also use or may use GPS technology to determine your current location. Some of our location-enabled Services require your personal data for the feature to work. If you wish to use the particular feature, you will be asked to consent to your data being used for this purpose. You can withdraw your consent at any time by contacting us at FreeHour Limited 10, Triq ic-Citru, Attard, Malta ATD2050 or on [hello@freehour.eu](mailto:hello@freehour.eu). You can remove permissions manually by following the steps [here](#) for Apple/iOS devices, or [here](#) for Android devices.
4. **Information we receive from other sources:** We are working closely with third parties (including Facebook). We will notify you when we receive information about you from them and the purposes for which we intend to use that information (“Third Party Information”).
5. **Unique application numbers:** When you install or uninstall a Service containing a unique application number or when such a Service searches for automatic updates, that number and information about your installation, for example, the type of operating system, may be sent to us.

### 3. Cookies

Our website does not collect cookies.

#### 4. Uses Made of the Information

We use information held about you in the following ways:

1. Device Information: This information is used for the Third-Party service used for sending push notifications, currently One Signal.
2. Content Information: This is the information that the user is entering when using the App for the purpose of sharing with friends. This information is also used to provide targeted advertisements on the App.
3. Log Information: To analyse how frequently the App is being used and what areas of the App have been used or viewed. This information is also used to troubleshoot any problems that may occur within the system. However, any information used to locate which sections of our App are used is anonymous, and we will not know which sections a specific User (you) has accessed.
4. Location information: This information is used for the purpose of sending push notifications to particular places, depending on which school or university you input in the app.
5. Third Party Information: This information is used to facilitate the login and registration process and create an account to be shared with friends; or to import calendar events to auto-generate your timetable on FreeHour.
6. Unique application numbers: Same as point 1 - Device information above.
7. Any additional categories and their purposes:

We may associate any category of information with any other category of information and will treat the combined information as personal data in accordance with this Privacy Policy for as long as it is combined.

We do not disclose information about identifiable individuals to our advertisers, but we may provide them with anonymous aggregate information about our users (for example, we may inform them that 500 men aged under 20 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in a particular area). We will use the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience. This also ensures that you are also targeted with products that are more likely to be of interest to you.

## **5. Disclosure of Your Information**

We may disclose your personal information to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in article 2 of the Companies Act (Chapter 386 of the Laws of Malta).

We will disclose your personal information to third parties:

- (a) In the event that we sell or buy any business or assets, in which case we will disclose your personal data to seller or buyer of such business or assets. We will let you know before the transfer occurs, and you will have the chance to delete account, thereby deleting your personal data from our servers.
- (b) If FreeHour Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets. We will let you know before the transfer occurs, and you will have the chance to delete account, thereby deleting your personal data from our servers.
- (c) If we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation or request.
- (d) In order to:
  - (i) enforce or apply the T&Cs and other agreements or to investigate potential breaches; or
  - (ii) protect the rights, property or safety of FreeHour Limited, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection.
  - (iii) Protect our interests in the eventuality of a legal claim.

## **6. Where We Store Your Personal Data**

1. The data that we collect from you will be transferred to, and stored at, a destination within the European Economic Area (EEA). It will also be processed by staff operating within the EEA who work for us or for one of our suppliers. These staff may be engaged in the fulfilment of your request, order or reservation, and the provision of support services. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with the Privacy Policy.
2. All information you provide to us is stored on our secure servers, or on secure servers of our service providers.

3. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to the App, or Our Sites. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.
4. We will collect and store personal data on your Device using application data caches and browser web storage (including HTML 5).
5. Certain Services include social networking, chat room or forum features. Ensure when using these features that you do not submit any personal data that you do not want to be seen, collected or used by other users.
6. The personal data collected will be stored for a necessary time period according to the specific purposes for which they are collected and processed, unless a longer retention period is required or permitted by law.
7. Your data will not be retained after you have notified us regarding your wish for your data to be removed from our servers, unless we rely on other lawful basis of processing, such as statutory obligations.

## **7. Your Rights**

1. You have the right to ask us not to process your personal data for marketing purposes. We will inform you if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at FreeHour Limited 10, Triq ic-Citru, Attard, Malta ATD2050 or on [hello@freehour.eu](mailto:hello@freehour.eu).
2. You have the right to request us to rectify or erase your personal data. You also have the right to request us to restrict processing of your data or to object to processing of any data.
3. The App and/or Our Sites may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates (including, but not limited to, websites on which the App or the Services are advertised). If you follow a link to any of these websites, please note that these websites and any services that may be accessible through them have their own privacy policies and that we do not accept any

responsibility or liability for these policies or for any personal data that may be collected through these websites or services, such as contact and location data. Please check these policies before you submit any personal data to these websites or use these services.

4. You have the right to withdraw your consent at any time by deleting your App profile and deleting the App from the Device/s on which it is being used. This will not affect the lawfulness of the processing of data before withdrawal of consent. You can withdraw your consent or for asking to be forgotten at any time by contacting us at FreeHour Limited 10, Triq ic-Citru, Attard, Malta ATD2050 or on [hello@freehour.eu](mailto:hello@freehour.eu).
5. You have the right, as a data subject, to lodge a complaint with a supervisory authority. You may do so by visiting the Information and Data Privacy Commissioner's website, on: <https://idpc.org.mt/contact/>

## **8. Access to Information**

The Data Protection Act (Chapter 440 of the Laws of Malta) and the new EU General Data Protection Regulation gives you the right to access information held about you. Your right of access can be exercised in accordance with that Act.

## **9. Changes to Privacy Policy**

Any changes we may make to the Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail OR when you next start the App. The new terms may be displayed on-screen and you may be required to read and accept them to continue your use of the App or the Services.

## **10. Contact**

Questions, comments and requests regarding the Privacy Policy are welcomed and should be addressed to FreeHour Limited 10, Triq ic-Citru, Attard, Malta ATD2050 OR on [hello@freehour.eu](mailto:hello@freehour.eu).