

PRIVACY POLICY AND COOKIE POLICY

1. BACKGROUND

Trustontap LTD, of Lovegroves Farm, Long Wittenham, Abingdon, Oxfordshire, England, OX14 4QQ, company number 09864667 ("**TrustonTap**", "**we**", "**us**" or "**our**"), offers a digital platform to help you find and connect directly with the best quality carers.

We care about privacy and data protection and we are committed to protecting your personal information. We also aim at transparency, we want you to know what data we collect about you and how it is used and shared. Please be aware that, whilst we make our best efforts to keep your personal information safe, no website can be completely secure.

The following privacy policy ("**Privacy Policy**") and cookies policy ("**Cookies Policy**") relates to our use of any personal information regarding you we collect and process via our website, mobile application or any other personal information you provide us in person, via email, telephone, text message, or other means.

In the Privacy Policy and Cookies Policy, the terms processing, personal data, data controller, data processor, data subject shall have the same meaning as set out in the Data Protection Act 1998 ("**DPA**") as amended, extended or re-enacted from time to time and including all subordinate legislation made from time to time under the DPA or as defined by the Regulation of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (the "**GDPR**") once applicable and/or any corresponding or equivalent national laws or regulations once in force and applicable ("**Applicable Data Protection Laws**").

To learn more about your rights to privacy and data protection, we recommend you visiting the Information Commissioner' Office ("**ICO**") website at <https://ico.org.uk/>.

2. KEY TERMS

To help you understand the content of our Privacy Policy we have summarised some key terms:

Data Controller means the individual or organisation that, alone or jointly with others, exercises overall control over how Personal Data are processed and the purposes of such treatment.

Data Processor means any person (other than an employee of the data controller) who processes the data on behalf and under the instruction of the Data Controller.

Communication Methods mean email, telephone, notices posted on our Site, or any other communication methods.

Personal Data means any information relating to a living individual who can be directly or indirectly identified in particular by reference to an identifier. Personal Data may include identification numbers, location data and online identifiers.

Platform means TrustonTap virtual platform connecting carers and their potential clients mainly via TrustonTap website but also through other Communication Methods.

Processing means obtaining, recording or holding data or carrying out any operation in relation to Personal Data.

Sensitive Personal Data means data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

Services mean the services provided by TrustonTap to the individuals using the Platform to connect with carers ("**Clients**") and the services offered by TrustonTap to the carers using the Platform ("**Carers**"). Such services shall include, but are not limited to, making introductions, electronic messaging, facilitating bookings between Carers and Clients, and collecting payments on behalf of Carers in accordance with TrustonTap Client Terms for the time being.

Third-Party Websites mean websites owned and operated by third parties.

Site means TrustonTap website or app as available from time to time

3.1. PRIVACY POLICY IN RELATION TO WEBSITE USERS

The following terms in this paragraph apply only to users of the Site who are not otherwise using our Services or actively enquiring about our Services.

3.2. DATA CONTROLLER

TrustonTap will be the Data Controller with regards to the processing of your Personal Data provided to, or collected by or for, in connection with your use of our Site. We are based and operates within the United Kingdom. If you have any query regarding our use of your data please contact us at info@trustontap.com.

3.3. LEGAL BASIS FOR PROCESSING

If you navigate our Site, you consent to the processing of your Personal Data under this Privacy Policy. You can always opt-out or control how we use your data. Please read paragraph 5.6 to learn more about your rights.

Please be aware that we also rely on legitimate interest to process your Personal Data. Our legitimate interest includes our commercial interest in offering our Services to the public.

3.4. INFORMATION WE COLLECT ABOUT YOU

We log your visits and your usage data when you visit our Site. In particular, we use internet protocol ("**IP**") addresses, cookies and similar technologies (e.g., web beacons, pixels, ad tags and device identifiers) to identify you or your device. Please read our Cookies Policy below at paragraph 6 to learn more about how we use cookies and similar tracking technologies and how to opt out.

We receive data from your devices and networks, including location data. When you visit or leave our Site, we receive the URL of both the site you came from and the one you go to next. We also get information about your IP address, proxy server, operating system, web browser and add-ons, device identifier and features, and/or ISP or your mobile carrier. If you use our Site from a mobile device, that device will send us data about your location. Most devices allow you to prevent location data from being sent to us and we respect your settings.

3.5. HOW WE USE YOUR PERSONAL DATA

We use your Personal Data to give you access to our Site and in particular to:

- a. provide you with information about TrustonTap Services;
- b. contact you through any Communication Method about our Services, provided that you have previously consented to us contacting you. You may always opt to be excluded from communications regarding TrustonTap and our Services by sending an email to info@trustontap.com;
- c. produce aggregate insights that do not identify you; and
- d. investigate, respond to and resolve complaints and service issues.

3.6. RECIPIENTS OF YOUR DATA

3.6.1. To provide and develop our Site, we may share your Personal Data with:

- a. our subsidiaries, as defined by section 1162 of the Company Act 2006 as amended, extended or re-enacted from time to time, provided that our subsidiaries will be subject to the same terms of this Privacy Policy; and
- b. third parties for maintenance, analysis, audit, payments, marketing and development. Third parties will only have access and use your information as reasonably necessary to perform these tasks on our behalf and they will be bound to non-disclosure obligations and to the terms of this Privacy Policy.

3.6.2. We may have to disclose your Personal Data if it is reasonably necessary to: (i) investigate, prevent, or take action regarding suspected or actual illegal activities or to assist government enforcement agencies; (ii) enforce our agreements with you; investigate and defend ourselves against any third-party claims or allegations; (iii) protect the security or integrity of our Services.

3.6.3. We will attempt to notify you about legal demands for your Personal Data when appropriate in our judgment, unless prohibited by law or court order or when the request is an emergency. We may dispute such demands when we believe, in our discretion, that the requests are overbroad, vague or lack proper authority, but we do not promise to challenge every demand.

3.6.4. We may share your Personal Data as part of a sale, merger or change in control, or in preparation for any of these events. Any other entity which buys us or part of our business will have the right to continue to use your data, but only in the manner set out in this Privacy Policy.

3.7. DATA RETENTION

We will normally keep your Personal Data for as long as it is necessary to provide you with access to our Site or Services and in any case for a maximum of 3 months from the first collection of your Personal Data.

3.8. CROSS-BORDER DATA TRANSFERS

We do not transfer, store or process your Personal Data at destinations outside the European Economic Area (“EEA”).

PRIVACY POLICY IN RELATION TO CLIENTS, CARERS AND INDIVIDUALS ENQUIRING ABOUT THE SERVICES

The following terms in this paragraph apply only to Clients and to individuals enquiring about the services.

4.1. DATA CONTROLLER

TrustonTap will be the Data Controller with regards to the processing of your Personal Data provided to, or collected by, for or in relation to, our Services.

We are based and operates in the United Kingdom. If you have any query regarding our use of your data please contact us at info@trustontap.com.

4.2. LEGAL BASIS FOR PROCESSING

PERSONAL DATA

For the purpose of performing and providing information about the Services, we may process Personal Data of our Clients, of Carers and of individuals enquiring about the Services on the basis that we have a legitimate interest in such processing that includes our commercial interest in offering and providing our Services.

Furthermore, we may process Personal Data of Clients, of Carers, and of individuals enquiring about the Services on the basis that: (i) the individual data subject has consented to such processing; (ii) it is necessary for the entry into, or performance of, a contract or in order to take steps at their request prior to the entry into a contract; (iii) it is necessary for compliance with a legal obligation.

SENSITIVE PERSONAL DATA

For the purpose of proving the Services, we may process Sensitive Personal Data of Clients and of Carers on the basis that the individual data subject has given explicit consent to the treatment of her/his Sensitive Personal Data.

If a Client is arranging care for a family member or third party, he/she will be responsible for obtaining the necessary consent from the individual who will be subject to our processing of his/her Sensitive Personal Data for the exclusive purpose of performing our Services. We are happy to assist our Clients in the process of obtaining such consent, please contact us at info@trustontap.com for more information.

4.3. HOW WE USE YOUR PERSONAL DATA

We use your Personal Data to give you access to our Site and to provide you with our Services and in particular to:

- a. administer and process registrations;
- b. authenticate and grant Clients or Carers with access to some areas of our Site;
- c. making introductions, facilitating bookings between Carers and Clients, and collecting payments on behalf of Carers in accordance with TrustonTap Client Terms for the time being;
- d. correspond with Clients, Carers, and individuals enquiring about the Services through any Communication Methods, about enquires, registrations, bookings and other Services relates requests;
- e. contact Clients and Carers via any Communication Methods about the availability of our services, security, other service-related issues, network updates, reminders and suggestions;
- f. provide Clients, Carers and individuals enquiring about the Services with information about our offering. You may opt to be excluded from communications regarding TrustonTap and our products and services by ticking the appropriate box on the Registration Section or by sending an email to info@trustontap.com;
- g. produce aggregate insights that do not identify any individual user of our Services; and
- h. investigate, respond to and resolve complaints and service issues.

Please be aware that as long as you are using our Services you cannot opt out of receiving essential service messages from us, including security and legal notices.

4.4. INFORMATION WE HOLD

We may collect Personal Data about you, including but not limited to your name, email address, home address, mobile number, and password, when you register or enquire about the Service. In addition, we may also collect and process your biographical data, and other Personal Data in order to perform our Services.

We only collect Sensitive Personal Data regarding your health or the health of the individual for whom you request the Service. We do this with your explicit consent or provided that you have obtained explicit consent from the individual for whom you request the Service, as the case may be.

We log your visits and use of our Services, your usage data when you visit or otherwise use our Services. We use log-ins, IP addresses, cookies and similar technologies (e.g., web beacons, pixels, ad tags and device identifiers) to log your use, and identify you or your device. Please read our Cookies Policy below at paragraph 6 to learn more about how we use cookies and similar tracking technologies and how to opt out.

When you visit or leave our Site, we receive the URL of both the site you came from and the one you go to next. We also get information about your IP address, proxy server, operating system, web browser and add-ons, device identifier and features, and/or ISP or your mobile carrier. If you use our Site from a mobile device, that device will send us data about your

location. Most devices allow you to prevent location data from being sent to us and we respect your settings.

4.5. RECIPIENTS OF YOUR DATA

4.5.1 To provide and develop our Services, we may share your Personal Data with:

- a. Carers who are on the TrustonTap platform and who may be able to provide services to you or someone that you are representing;
- b. our subsidiaries, as defined by section 1162 of the Company Act 2006 as amended, extended or re-enacted from time to time, provided that our subsidiaries will be subject to the same terms of this Privacy Policy;
- c. subcontractors who may perform the whole or part of the Services on behalf of TrustonTap ("**Subcontractors**"), provided that the Subcontractors will be bound to substantially the same obligations imposed on TrustonTap under its agreement with each Data Controller for the time being and to the terms of this Privacy Policy; and
- d. third parties (e.g. for maintenance, analysis, audit, payments, marketing and development). Third parties will only have access and use your information as reasonably necessary to perform these tasks on our behalf and they will be bound to non-disclosure obligations and to the terms of this Privacy Policy.

4.5.2 We may share, under strict confidentiality and only for the purpose of providing you with the Service, Sensitive Personal Data regarding yourself or the individual for whom you request the Service, as the case may be, with the individual Carer that you have selected to take care of yourself or of the individual for whom you request the Service.

4.5.3 We may have to disclose your Personal Data, including your Sensitive Personal Data, if it is reasonably necessary to: (i) investigate, prevent, or take action regarding suspected or actual illegal activities or to assist government enforcement agencies; (ii) enforce our agreements with you; (iii) investigate and defend ourselves against any third-party claims or allegations; (vi) protect the security or integrity of our Services.

4.5.4 We will attempt to notify you about legal demands for your Personal Data, which may include some of your Sensitive Personal Data, when appropriate in our judgment, unless prohibited by law or court order or when the request is an emergency. We may dispute such demands when we believe, in our discretion, that the requests are overbroad, vague or lack proper authority, but we do not undertake or warrant to challenge every demand.

4.5.5 We may also share your Personal Data, including your Sensitive Personal Data, as part of a sale, merger or change in control, or in preparation for any of these events. Any other entity which buys TrustonTap or part of our business will have the right to continue to use your data, but only in the manner set out in this Privacy Policy.

4.6. DATA RETENTION

CLIENTS AND CARERS

Unless you have agreed for us to retain your Personal Data for a longer period, we will keep your Personal Data only for as long as it is necessary to provide you with our Services.

We may need to retain part of your Personal Data and Sensitive Personal data even after termination of any agreement with you for the provisions of our services, to comply with our legal obligations (including law enforcement requests), meet regulatory requirements, resolve disputes, maintain security, prevent fraud and abuse, enforce our agreements with you. Unless otherwise agreed this will be no longer than 7 years after the termination of our agreements with you.

INDIVIDUALS ENQUIRING ABOUT THE SERVICES

We keep your Personal Data only for as long as it necessary and in any case no longer than 3 months from our latest communication with you.

4.7. CROSS-BORDER DATA TRANSFERS

We do not transfer, store or process your Personal Data at destinations outside the European Economic Area (“EEA”).

5.1. GENERAL

The following terms in this paragraph apply to Clients, Carers, users of the Site and individuals enquiring about the Services.

5.2. CHANGE TO THIS PRIVACY POLICY

As we are committed to constantly improving our Services, we may change the selection of data and the way we process it. We reserve the right to change or adapt this Privacy Policy from time to time. In case of any material change to our Privacy Policy, we will update the version available on our Site as soon as reasonably possible.

5.3. LINKING TO OTHER WEBSITES

For your information and convenience only, the Site contains hyperlinks to Third-Party Websites. TrustonTap has no control over and does not endorse any content or service displayed, contained or related to those Third-Party Websites. We make no warranties or representations, express or implied, about Third-Party Websites or any content, products, material or service contained, displayed or related to them. If you decide to access any Third-Party Websites and make use of the information contained on them or to enter into any contract for the supply of goods or services from such third party, you do so entirely at your own risk. We accept no liability for damage or loss, however caused in the connection with the use of or reliance on any information, material, products or services contained on or accessed through any such Third-Parties Websites.

5.4. THIRD-PARTY ADVERTISERS

We do not share your Personal Data with any third-party advertisers or ad networks for their advertising without your separate permission.

5.5. SECURITY

We implement a number of security safeguards designed to protect your data, such as HTTPS. We regularly monitor our systems for possible vulnerabilities and attacks. However, we cannot warrant the security of any information that you send us. There is no guarantee that data may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards.

5.6. YOUR RIGHTS

Right of Access. We offer you access to the Personal Data we hold about you. Please be aware that the purpose of an access request is to give you the opportunity to confirm the accuracy of Personal Data we are holding about you, the lawfulness of our processing and to allow you to exercise your rights under Applicable Data Protection Laws if necessary.

We reserve the right to reject manifestly unfounded (e.g. made for other, non-data protection purposes) or excessive requests.

To have access to the Personal Data we store about you, please contact us at: info@trustontap.com.

Right to Withdraw Consent. Please be aware that, if you have given us consent to process your data for the purposes detailed in this Privacy Policy, you can always change your mind and withdraw your consent by contacting us at info@trustontap.com.

In order to process your request, we may ask you to send us a copy of two forms of identification (such as passport, driving licence, birth certificate, bank statement, utility bills). You also have the right to lodge a complaint about our processing of your data and/or our handling of your complaints to ICO or the appropriate data protection authority if you reside outside the United Kingdom.

To learn more about your rights please visit ICO's website at <https://ico.org.uk/>.

COOKIES POLICY

The following terms in this policy apply to Clients, Carers, users of the Site and individuals enquiring about the Services.

1. DEFINITIONS

A cookie is a small file that is downloaded on to your computer or smartphone or similar devices (a “**Device**”) when you visit a website. It allows a website to recognise your Device and store several information about you, like your preferences or past actions.

2. HOW WE USE COOKIES

We place cookies onto your Device to give you and anyone visiting our Site the best possible experience. In general terms, we use cookies to enables our Site’s features and functionality, and to keep your data safe. Also, we use cookies to identify your Device, secure your access to our Site, and to know if someone attempts to access your account from a different device.

3. WHEN WE PLACE COOKIES?

Anytime you visit our Site you may receive cookies from us. In particular, we use the following types of cookies:

Strictly necessary cookies. These are cookies that are required for the operation of our Site. They include, for example, cookies that enable and support our security features.

Analytical/performance/research cookies. They allow us to analyse the number of visitors and how visitors move around our Site when they are using it. This helps us to improve our Service and the way our Site works (for example, by ensuring that users are finding what they are looking for easily).

Functionality cookies. These are used to recognise you when you visit our Site. This enables us to personalise our content for you, and remember your preferences (for example, your choice of language or region).

Targeting cookies. These cookies record your visit to our Site, the pages you have visited and the links you have followed. We will use this information to make our Site and Service more relevant to your interests. We may also share this information with third parties for this purpose.

4. THIRD-PARTY COOKIES

Our cookie table on our website [[Insert Hyperlink](#)] lists some of the third-party cookies on our sites. Please note that the names of cookies, pixels and other technologies may change over time.

5. CONTROLLING COOKIES

You should be able to control cookies through the setting preferences of your web browser (most browser manufacturers provide online help pages relating to cookie management). You

should be allowed to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our Site.

Our Site allows you to opt-out of some cookies on your settings page [INSERT HYPERLINK]. If you use our Site without changing your browser settings, we will assume that you are happy to receive all cookies available on our Site.

6. EXPIRATION

Except for essential cookies, all cookies will expire after one year.