



BRICKLIVE GROUP LIMITED PRIVACY POLICY

Dated: January 2022

This Privacy Policy (**Policy**) describes how Brick Live Group (referred to as **we** or **our** or **us** in the Policy) collects, stores, shares, and uses information, and your choices about privacy, when you use our Brick Live Group website and any other website, mobile applications, social media accounts and other mechanisms through which you can access the Services and Content or otherwise communicate with us. (the **Site**).

This Policy is part of our Terms of Use, which can be viewed at: [Terms of Use]. Any capitalised terms that are used but not defined in this Policy have the same meaning given to them in our Terms of Use.

Introduction

This Policy (together with our Terms of Use) applies to your use of:

- Any of the services accessible through the Site (**Services**).

This 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. This Site is not intended for children (being anyone under the age of 18) and we do not knowingly collect data relating to children. If we determine that we have received personal data from a person under the age of 18, we will delete it.

Please read the following carefully to understand our practices regarding your personal data and how we will treat it. Please note that if the laws of your jurisdiction provide for privacy protections that conflict with the provisions of these Terms, the statutory consumer protections shall apply.

This Policy is provided in a layered format so you can click through to the specific areas set out below.

[IMPORTANT INFORMATION AND WHO WE ARE]

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[PRIVACY PROVISIONS SPECIFIC TO USERS RESIDING IN THE UNITED STATES] [GLOSSARY]

[DESCRIPTION OF CATEGORIES OF PERSONAL DATA]



Important information and who we are

BRICKLIVE is the controller and is responsible for your personal data.

We have appointed a data privacy manager. If you have any questions about this Policy, please contact them using the details set out below.

Contact details

Our full details are:

- Full name of legal entity: Brick Live Group Limited
- Name or title of data privacy manager: Data Privacy Manager
- Email address: dataprivacy@bricklivegroup.com

If you reside within the United Kingdom or in the European Economic Area (**EEA**), you have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**), the UK supervisory authority for data protection issues or other competent supervisory authority of an EU member state if the Site is downloaded outside the UK. Residents of other countries have the right to make a complaint with their state or other governmental agencies having jurisdiction over privacy laws.

Changes to the Policy and your duty to inform us of changes

We keep our Policy under regular review.

It may change and if it does, these changes will be posted on this page and, where appropriate, notified to you when you next start the Site. The new Policy may be displayed on-screen and you may be required to read and accept the changes to continue your use of the Site or the Services.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during our relationship with you.

Third party links

The Site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. 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 the services available through these websites.

The data we collect about you

We may collect, use, store and transfer different kinds of personal data about you as follows:

- **Identity Data** includes first name, last name, email address, postal address (excluding street identifier) username or similar identifier, date of birth, or age banding, and at the user's option, visual identifiers (including photographs and videos) and telephone number.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.



- **Device Data** includes the type of mobile device you use, a unique device identifier (for example, your Device's IMEI number, the MAC address of the Device's wireless network interface, or the mobile phone number used by the Device), mobile network information, your mobile operating system, the type of mobile browser you use, and the time zone setting.
- **Content Data** includes information stored on your Device, including friends' lists, login information, photos, videos or other digital content.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our Site, products and Services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Location Data** includes details of your current location disclosed by GPS or other technology.
- **Transaction Data** includes details about payments to and from you and details of Online purchases.

We also collect, use and share Aggregated Data, meaning data such as statistical or demographic data, for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific Site feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Policy.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences. We currently do not collect any financial data in connection with your use of the Site. Any purchases that you make in connection with the Site or Services are processed through a third-party payment processor.

How is your personal data collected?

We will collect and process the following data about you:

- **Information you give us.** This is information (including Identity, Contact, Usage, Transaction, and Marketing and Communications Data) you consent to giving us about you by filling in forms on the Site, or by corresponding with us (for example, by email or chat). It includes information you provide when you register to use the Site and Services, download or register the Site, subscribe to any of our Services, search for the Site or a Service, make an Online purchase, share data via the Site's social media functions, enter a competition, promotion or survey, or other activities carried out in connection with the Site, and when you report a problem with the Site, our Services, or the Site. If you contact us, we will keep a record of that correspondence.



- **Information we collect about you and your device.** Each time you access or use the Site we will automatically collect personal data including Device, Content and Usage Data. We collect this data using cookies and other similar technologies. Please see our cookie section below [cookie section below] for further details.
- **Location Data.** We also use GPS or other 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 disabling Location Data in your settings or by contacting our Customer Services [contact details below].
- **Information we receive from other sources including third parties and publicly available sources.** We will receive personal data about you from various third parties as set out below:
 - Device Data from the following parties:
 - analytics providers (such as Google) based outside the EU;
 - advertising networks based inside or outside the EU; and
 - search information providers based inside or outside the EU.
 - Contact, Transaction Data from providers of technical, payment and delivery services based inside or outside the EU;
 - Identity and Contact Data from data brokers or aggregators based inside or outside the EU;
 - Identity and Contact Data from governmental and other publicly available sources based inside or outside the EU; and
 - **Any other ways of collecting personal data to be determined**
 - **Unique application numbers.** When you want to 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.

Cookies

We use cookies and/or other tracking technologies to distinguish you from other users of the Site and to remember your preferences. This helps us to provide you with a good experience when you use the Site or Services and also allows us to improve the Site and the Services. For detailed information on the cookies we use, the purposes for which we use them and how you can exercise your choices regarding our use of your cookies, see our cookie policy [described in the Cookie Policy]. You have the ability to disable cookies, other than necessary cookies (described in the Cookie Policy) but this will limit your access to certain benefits of the Site and Services.



How we use your personal data

We will only use your personal data when the law allows us to do so. Most commonly we will use your personal data in the following circumstances:

- Where you have consented before the processing.
- Where we need to perform a contract we are about to enter or have entered with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
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We will only send you direct marketing communications if we have your consent. You have the right to withdraw that consent at any time by contacting us.

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Purposes for which we will use your personal data

Purpose/activity	Type of data	Lawful basis for processing
To register you as a new user on the Site	Identity Contact Device And any optional information you choose to provide to us	Your consent
To process Online purchases and deliver Services including managing payments and collecting money owed to us	Identity Contact Transaction Device Marketing Communications and Location	Your consent Performance of a contract with you Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you including notifying you of changes to the Website or any Services	Identity Contact Profile	Your consent Performance of a contract with you Necessary for our legitimate interests (to keep records

	Marketing Communications	and	updated and to analyse how customers use our products/ Services) Necessary to comply with legal obligations (to inform you of any changes to our terms and conditions)
To enable you to participate in a prize draw, or competition	Identity Contact Device Profile Marketing Communications	and	Your consent Performance of a contract with you Necessary for our legitimate interests (to analyse how customers use our products/Services and to develop them and grow our business)
To administer and protect our business and this Site including troubleshooting, data analysis and system testing	Identity Contact Device		Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security)
To deliver content to you To measure and analyse the effectiveness of the content and advertising we serve you To monitor trends so we can improve the Site	Identity Contact Device Content Profile Usage Marketing Communications Location	and	Consent Necessary for our legitimate interests (to develop our products/Services and grow our business)
To deliver advertisements to you	Identity Contact Device		Consent



To make recommendations to you about goods or services which may interest you	Content Profile Usage Marketing and Communications Location	
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Disclosures of your personal data

When you consent to providing us with your personal data, we will also ask you for your consent to share your personal data with the third parties set out below for the purposes set out in the table [*Purposes for which we will use your personal data*]:

- Internal Third Parties as set out in the [*Glossary*].
- External Third Parties as set out in the [*Glossary*].
- Specific categories of third parties listed in the table [*Purposes for which we will use your personal data*] above.

Please click [*Consents to Sharing of Data below*] to confirm your consent to receiving marketing communications from us and/or from third parties described in this Policy, where your consent to such sharing is required.

In addition, by accessing the Site and/or using the Services, you agree that we may share your personal data with third parties to whom we may choose to sell, transfer or merge parts of our business or our assets, including where such transfer is in connection with a bankruptcy or other insolvency proceeding or other operation of law, or where required by law or governmental order. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Policy.

International transfers

For all users, your personal data is stored in the cloud on servers operated and maintained by our third party service providers.

Our external third parties, vendors and partners are worldwide and their processing of your personal data may involve a transfer of data to countries outside of your country of residence. If you are a resident of the UK, or a member of the European Economic Area (the **EEA**), the following provisions apply:

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.



- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

Data security

All information you provide to us is stored in the cloud on servers operated and maintained by our third party service providers. Once we have received your information, we will use strict procedures and security features to try to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way. Our contracts with our cloud service providers require these entities to follow similar procedures. Of course, no data transmissions or storage can be guaranteed as completely secured in all circumstances and we do not warrant against data breach.

We will collect and store personal data on your Device using application data caches and browser web storage (including HTML5) and other technology.

Where we have given you (or where you have chosen) a password that enables you to access certain parts of the Site or Services, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

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.

We use a third party payment processor to coordinate payment transactions and this information will be encrypted using Secured Sockets Layer technology.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a personal data breach when we are legally required to do so.

Data retention

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six (6) years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see [*Your legal rights*] below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

If you do not use the Site for a period of six (6) months then we will treat the account as expired and your personal data may be deleted.



Your legal rights

Under certain circumstances you have the following rights under data protection laws in relation to your personal data.

- *[Request access to your personal data.]*
- *[Request correction of your personal data.]*
- *[Request erasure of your personal data.]*
- *[Object to processing of your personal data.]*
- *[Request restriction of processing your personal data.]*
- *[Request transfer of your personal data.]*
- *[Right to withdraw consent.]*

You also have the right to ask us not to continue to process your personal data for marketing purposes.

You can exercise any of these rights at any time by contacting our Customer Services [contact details below].

Privacy provisions specific to Users residing in the United States

If you reside in the United States, the following provisions are applicable to your access to and use of the Site and Services. In the event of any conflict or inconsistency between the following provisions and those contained elsewhere in this Policy, the following provisions shall govern.

What categories of personal information do we collect?

The date on which the Site was first made available to the public for use is January 2022 and no personal information was collected from users prior to this date. On a going-forward basis, we will disclose collection of the following categories of personal information.

Category	Examples	Collected (since inception of the Site)
A. Identifiers	Contact details, such as real name, alias, postal address, telephone or mobile contact number, unique personal identifier, online identifier, Internet Protocol address, email address and account name	

B. Personal information categories listed in the California Customer Records statute	Name, contact information, education, employment, employment history and financial information	
C. Protected classification characteristics under California or federal law	Gender and date of birth	
D. Commercial information	Transaction information, purchase history, financial details and payment information	
E. Biometric information	Fingerprints and voiceprints	
F. Internet or other similar network activity	Browsing history, search history, online behavior, interest data, and interactions with our and other websites, applications, systems and advertisements	
G. Geolocation data	Device location	
H. Audio, electronic, visual, thermal, olfactory, or similar information	Images and audio, video or call recordings created in connection with our business activities	
I. Professional or employment-related information	Business contact details in order to provide you our services at a business level, job title as well as work history and professional qualifications if you apply for a job with us	
J. Education Information	Student records and directory information	
K. Inferences drawn from other personal information	Inferences drawn from any of the collected personal information listed above to create a profile or summary about, for example, an individual's preferences and characteristics	

We may also collect other personal information outside of these categories in instances where you interact with us in-person, online, or by phone or mail in the context of:

- Receiving help through our customer support channels;
- Participation in customer surveys or contests; and



- Facilitation in the delivery of our Services and to respond to your inquiries

How do we use and share your personal information?

You may contact us by email at dataprivacy@bricklivegroup.com

If you are using an authorized agent, to the extent allowed by law to act on behalf of a resident, to exercise your right to opt-out, we may deny a request if the authorized agent does not submit proof that they have been validly authorized to act on your behalf.

Will your information be shared with anyone else?

We may disclose your personal information with our service providers pursuant to a written contract between us and each service provider. Each service provider is a for-profit entity that processes the information on our behalf.

We may use your personal information for our own business purposes, such as for undertaking internal research for technological development and demonstration. This is not considered to be "selling" of your personal data.

While we have not sold any personal information to third parties for a business or commercial purpose in the preceding twelve (12) months, we do use your personal information as described above and also share personal information with our business partners and sponsors and these third parties may use personal information for their business and commercial purposes.

You may opt-out of the sharing of your personal data by going to our "Do not sell my Personal Information" page [[Link to the Do not sell my Personal Information page](#)].

Your rights with respect to your personal data

Right to request deletion of the data - Request to delete

You can ask for the deletion of your personal information. If you ask us to delete your personal information, we will respect your request and delete your personal information, subject to certain exceptions provided by law, such as (but not limited to) the exercise by another consumer of his or her right to free speech, our compliance requirements resulting from a legal obligation or any processing that may be required to protect against illegal activities.

Right to be informed - Request to know

Depending on the circumstances, you have a right to know:

- whether we collect and use your personal information;
- the categories of personal information that we collect;
- the purposes for which the collected personal information is used;
- whether we sell your personal information to third parties;



- the categories of personal information that we sold or disclosed for a business purpose;
- the categories of third parties to whom the personal information was sold or disclosed for a business purpose; and
- the business or commercial purpose for collecting or selling personal information.

In accordance with applicable law, we are not obligated to provide or delete consumer information that is de-identified in response to a consumer request or to re-identify individual data to verify a consumer request.

Right to Non-Discrimination for the Exercise of a Consumer's Privacy Rights

We will not discriminate against you if you exercise your privacy rights.

Verification process

Upon receiving your request, we will need to verify your identity to determine you are the same person about whom we have the information in our system. These verification efforts require us to ask you to provide information so that we can match it with the information you have previously provided us. For instance, depending on the type of request you submit, we may ask you to provide certain information so that we can match the information you provide with the information we already have on file, or we may contact you through a communication method (e.g. phone or email) that you have previously provided to us. We may also use other verification methods as the circumstances dictate.

We will only use personal information provided in your request to verify your identity or authority to make the request. To the extent possible, we will avoid requesting additional information from you for the purposes of verification. If, however, if we cannot verify your identity from the information already maintained by us, we may request that you provide additional information for the purposes of verifying your identity, and for security or fraud-prevention purposes. We will delete such additionally provided information as soon as we finish verifying you.

Other privacy rights

- you may object to the processing of your personal data
- you may request correction of your personal data if it is incorrect or no longer relevant, or ask to restrict the processing of the data
- you can designate an authorized agent to make a request under on your behalf, where the laws of your state permit this. We may deny a request from an authorized agent that does not submit proof that they have been validly authorized to act on your behalf in accordance with applicable law.
- you may request to opt-out from future selling of your personal information to third parties. Upon receiving a request to opt-out, we will act upon the request as soon as feasibly possible, but no later than 15 days from the date of the request submission.



To exercise these rights, you can contact us by email at dataprivacy@bricklivegroup.com or by referring to the Contact details section of this Policy at the bottom of this document. If you have a complaint about how we handle your data, we would like to hear from you.

Glossary

Lawful basis

Consent means processing your personal data where you have signified your agreement by a statement or clear opt-in to processing for a specific purpose. Consent will only be valid if it is a freely given, specific, informed and unambiguous indication of what you want. You can withdraw your consent at any time by contacting us.

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

Third parties:

Internal third parties means the affiliated entities of BRICKLIVE GROUP acting as joint controllers or processors, who are based in the UK and provide IT and system administration or other services and undertake leadership reporting.

External third parties means:

Service providers acting as processors who provide IT and system administration services and other services in support of the Site and the Services.

Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.

Government officials, regulators and other authorities acting as processors or joint controllers in any country having jurisdiction who require reporting of processing activities in certain circumstances.

Any other third parties, for example, partners/sponsors, market researchers, fraud prevention agencies, price comparison sites.

Your legal rights

You have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - if you want us to establish the data's accuracy;
 - where our use of the data is unlawful but you do not want us to erase it;
 - where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims;
or
 - you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.