

PRIVACY AND COOKIES POLICY

The apps we publish (‘ Apps ’) and our websites including bravesparkmedia.com (‘ Site ’) are brought to you by Brave Spark Media Ltd. Please read this Privacy Policy (‘ the Policy ’) carefully as it contains important information about how we will use personal data obtained through our Apps or Sites.

For the purposes of the Data Protection Act 1998, Brave Spark Media Limited, registered company number: 07364502, company registered address: 14 Dufferin Street, London, EC1Y 8PD, United Kingdom (‘ we ’ or ‘ us ’) is the ‘data controller’ (i.e. the company who is responsible for, and controls the processing of, your personal data).

By accessing the Apps or the Sites you authorise us to collect, store, access, transfer and use your information as described in this Policy.

1. PERSONAL DATA WE MAY COLLECT ABOUT YOU

1.1 Data you supply (‘ Submitted Information ’) includes:

1.1.1 We will obtain personal data about you (such as your name, address, telephone number, email address) whenever you contact or make a purchase from us, register an account with us, submit material through a form, or via a service, in our Apps or on our Sites.

1.1.2 We may also obtain sensitive personal data about you if you voluntarily supply it through our Apps or Sites. If you volunteer such information, you will be consenting to our processing it for the purpose explained to you when you supply it.

1.2 Data we collect includes:

1.2.1 We may monitor your use of our Apps and Sites through the use of cookies and similar tracking devices. For example, we may monitor how many times you visit, which pages you go to, traffic data, your IP address, the browsers and devices you use to access our Apps and Sites, your internet service provider (‘ Analytics ’).

1.2.2 Our Apps or Sites may also collect information stored on your device, images, video or other digital content (‘ Content Information ’).

1.2.3 We may also obtain your current location. Some features of our Sites and Apps require your personal location to work, In which case you will be asked to consent to your data being used for this purpose (‘ Location Information ’).

1.2.4 When you install, uninstall or update our Apps, a unique application number and information about your installation, for example, the type of operating system, may be sent to us.

2. HOW WE USE YOUR PERSONAL DATA

2.1 We will use your personal data for the purposes described to you at the time your data

were obtained, and for the following purposes:

2.1.1 Submitted Information: to keep you informed about our news, products and services and those of carefully selected third parties, for example through our regular newsletters, and to help us identify you and any accounts you hold with us, to remember your preferences, for billing and order fulfilment, to let you know of any changes to our Sites or Apps which may affect you.

2.1.2 Analytics: for statistical and behavioural analysis, to improve our Apps and Sites.

2.1.3 Content Information: where you grant our Apps or Sites access to Content Information, we may use it to allow you to interact with your friends and other contacts through our Apps or Sites.

2.2 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 policy for as long as it is combined.

3. DISCLOSURE OF YOUR INFORMATION

3.1 We may disclose some or all of the data we collect from you when you download or use

the Apps or our Sites

3.2 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 section 1159 of the Companies Act 2006.

3.3 We may also disclose your personal information to third parties:

3.3.1 In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.

3.3.2 If Brave Spark Media 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.

3.3.3 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.

3.3.4 In order to enforce or apply the terms of agreements between us, to investigate potential breaches, or to protect the rights, property or safety of Brave Spark Media our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

4. WHERE WE STORE YOUR PERSONAL DATA

4.1 The data we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“ EEA ”). It may also be processed by staff operating outside the EEA who work for us or our suppliers. These staff may be engaged in the fulfilment of your request or order, the processing of your payment details, the provision of support services or the distribution of our communications. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

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

4.3 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 our Apps or Sites; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access. In particular, any information which is not anonymous, is encrypted and access is restricted only to those individuals who need it for the purposes discussed in this privacy policy.

4.4. We may collect and store personal data on your devices using application data caches, flash cookies, or browser local storage.

4.5. Certain features of our Apps and Sites enable social networking, messaging, publishing, 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.

5. YOUR RIGHTS

5.1 If you believe we have information about you that you do not want us to have or that is incorrect please contact us as at sayhi@bravesparkmedia.com and we shall correct or remove the data as you request as soon reasonably practicable. If you would like to receive a copy of the information we have about you.

5.2 We will usually inform you in advance if we intend to use your data, or to disclose it to any third party, for marketing purposes. If you prefer that we do not use your data in this way, let us know by writing to sayhi@bravesparkmedia.com or by checking boxes on the forms we use to collect your data.

6. EXTERNAL WEBSITES

6.1. If you follow a link from our Apps or Sites to any third party websites or services, please note that we do not accept any responsibility or liability for the collection, storage or use of personal data by those third parties, and you should check the applicable privacy policies before you submit any personal data to those websites or use these services.

7. COOKIES

7.1 A cookie is a text file placed onto your device when you access our Apps or Sites. We use cookies and other online tracking devices such as web beacons, action tags, Local Shared Objects, and flash object storage to deliver, improve and monitor our Sites and Apps, including in the following ways:

Authentication	To log you into our Sites and Apps and keep you logged in.
Preferences	To remember information about you such as your preferred language and configuration.
Analytics	To help us understand how you use our Apps and Sites, and how often, so we can improve them to deliver a better experience for our users.
	To carry out research and statistical analysis to help improve our content, products and services.

7.2 The information we obtain from our use of cookies will not usually contain your personal data. Although we may obtain information about your device such as your IP address, your browser and/or other internet log information, this will not usually identify you personally.

7.3 Our Sites and Apps display a notice alerting you to our use of cookies and other similar technologies and linking to this privacy policy. If you use our Sites and Apps after this notice has been displayed to you we will assume that you consent to our use of cookies or similar technologies for the purposes described in this privacy policy.

7.4 Please note that, if you choose to disable cookies or similar technologies on your device, you may be unable to make full use of our Apps and Sites.

7.5 We work with third parties who may also set cookies on our website, for example Google Analytics, Google Plus, Facebook, LinkedIn, Twitter and YouTube, which we use to display video content, enable social networking functionality and sharing, and to monitor how visitors use our Apps and Sites. These third party suppliers are responsible for the cookies they set on your device. For further information please visit the website of the relevant third party.