

Greek List Ltd

Effective Date: [5/12/2020]

This Privacy Statement explains how Greek List Ltd collects, controls, processes, and uses information about you (which we call “personal data”).

When we say “Greek Select”, “us”, “our”, or “we”, we mean Greek List Ltd that is the operator of the [BRAND SITES NAMEs] marketplace. It provides platforms where either us and other unaffiliated third-party sellers (collectively “Sellers”) can list offers for vouchers, deals, goods, getaways, and other offerings.

Furthermore, amongst Greek Select’s primary purposes is to collect and use information about you on our consumer-facing websites is to enable you to effectively use our business search services, to provide you with business information responsive to your queries, to facilitate connections between you and businesses with which you engage on this Site (as defined below), and to provide you with advertisements and marketing that match your interests and preferences.

When we talk about the “Site”, we mean our platforms, which include our websites, mobile applications, communications we send or services we provide, social networking sites, or any other websites we offer that link to or reference this Privacy Statement including by way of indication: [Greeklist.co.uk, Greekselect.com].

Change

We routinely update this Privacy Statement to clarify our practices and to reflect new or different privacy practices, such as when we add new services, functionality, or features to the Site. If we make any material changes, we will notify you, either by email (sent to the email address specified in your account), by means of notice on the Site or by using other methods. You can determine when this version of the Privacy Statement was adopted by referring to the “Effective Date” above.

You understand that your continued use of the Site after we send a notice about our changes to the Privacy Statement means that the collection, control, processing, and use of your personal data is subject to the updated Privacy Statement. If you object to any changes, you may modify your account settings or close your account as described below.

1. Personal Data We Collect

We will collect the following personal data when you interact with the Site:

- Authentication and identification information (e.g. your name, email address, and password). This information is necessary to set up and log you into your account, but you do have the option to make purchases without creating a password. If you don’t provide this, we may not be able to provide our full range of account services to you;
- Basic personal details (e.g. your name, date of birth, and nationality);
- Contact details (e.g. your postal address, telephone number, and email address). We may need some of this information to deliver products to you, such as your postal address to deliver physical products and your email address to send you vouchers, and won’t be able to carry out these services if you don’t provide it;

- Payment details (e.g. your credit card details or payment tokens from third party payment providers like PayPal). We use these to process your order, and won't be able to take payment from you or give refunds if you don't provide it; and
- Information about your contacts with Greek Select and/or Sites (e.g. instant messages on our Site, and user generated content).

Some information we collect is necessary for us to provide our services or meet our legal obligations. We will make this clear when we collect that information from you.

We will also automatically collect personal data when you interact with the Site through your computer, mobile device, or other device. This personal data includes the following:

- Analytics data (e.g. information about app downloads, app and web page histories), which may include data collected from cookies and other types of device identifiers;
- Profile inputs (e.g. page and deal views on the site, purchase details, click information and information about the website you clicked to our Site from). This may include data about your location. With respect to geolocation information collected from your mobile device, we will only collect this where you have provided consent; and
- Device details (e.g. MAC address, IP address, bluetooth data and advertising identifiers).

We also receive personal data and other online and offline information from third parties with whom we conduct business, such as merchants, co-marketers, distributors, resellers, and other companies or organizations with whom we enter into agreements to support our business and operations, including advertising partners and third party data providers that provide us with supplemental or additional information about our customers (collectively "Business Partners").

The personal data we receive from Business Partners includes basic personal details, contact details, device details, profile inputs, as well as:

- Demographic information, (e.g. details about age brackets and educational background);
- Location data (e.g. information about postal or ZIP code); and
- Purchase information from third party sites (e.g. information about purchases on other sites).

We will only receive data from our Business Partners where they are legally permitted to share such data, and we will only process that data for the purposes described below. We use the data provided to better understand your preferences, deals that are relevant to you, and how our merchants are performing. By combining the data we collect directly from you with that received from third parties, we are able to provide you with a better, and more personalized, Greek Select and other Site experience.

We will collect the personal data described above at various stages in your relationship with us when you:

- Register, subscribe, authorise the transfer of, or create an account with us. If you choose not to create a password for your account, we create an account and link your purchase details to your email address, which you can set a password for during each purchase;
- Open or respond to emails or messages from us;

- Provide information to enrol or participate in programs provided on behalf of, or together with Sellers and Business Partners, with your consent or as necessary to provide services you have requested;
- Visit any page online that displays our ads or content;
- Purchase products or services on or through the Site from Sellers;
- Connect, log-in, or link to the Site using social networking tools; and
- Post comments to the online communities sections of the Site.

We also create profiles about you based on the personal data you provide to us or that is collected about you, as described above and including personal data that we receive from Business Partners. We do this to market offers to you we think you would be interested in buying. The contents of that profile include:

- **Account details.** For example, we create a permanent URL to your account page which may include your name. We also generate tokens to remember your subscription and purchase histories, and any loyalty numbers you may have obtained;
- **Marketing segment information.** For example, if you purchase products or services related to wellness and beauty, we may infer that you are interested in these types of products, or if you purchase Greek Select Getaways or Site deals we may infer that you are a frequent traveler;
- **Audience information.** We create audiences based on parameters such as gender, age, and location (e.g. males aged 25-35 in your city), and if your personal data matches those audiences, you'll be assigned to it. This is to help you receive relevant offers; and
- **Activity information.** Based on your interactions with communications, we'll generate personal data about how many communications you like to receive, so that we don't send you more than are useful to you.

2. Your Choices

You can manage the types of personal data you provide to us and can limit how we communicate with you. At the same time, we think that the more you tell us about yourself and what you like, the more relevant and valuable your experience with our Site and services will be.

You can manage your email, push notification, location information and subscription notification preferences by logging into your account through the Site n:

- **Push notifications and location information.** Your device provides you with options to control push notifications and how and when we collect your geolocation. You can disallow our use of certain location data through your device or browser settings, for example, by disabling "Location" services for your device;
- **Subscriptions.** You can also manage your subscriptions by following subscription management instructions contained in any commercial emails that we send you. You may choose to subscribe to some types of messages, and may choose not to subscribe to, or to unsubscribe from, others. You may update your subscription preferences at any time. Even if you decide not to subscribe to, or to unsubscribe, from promotional email messages, we may still need to contact you with important transactional information related to your account and your

purchases from Sellers. For example, even if you have unsubscribed from our promotional email messages or push notifications, we will still send you confirmations when you make purchases on the Site;

- **Cookies.** You can manage how your browser handles cookies. You may also manage how your mobile device and mobile browser share information on and about your devices with us, as well as how your mobile browser handles cookies. Please refer to our [Cookies Policy](#) for more information;
- **Objecting to uses of data.** In certain circumstances, you have the right to object to the use of your personal data. In particular, you can object to our use of personal data where we use such data to meet our own interests in running our business (as described under 'How We Use Information' below and including use of your data for marketing purposes and management of our business needs). If you object to our use of your data, we will assess the objection and cease processing that data upon confirmation of a valid request. For more information, see 'Your Rights' below;
- **Social networking.** You may also manage sharing certain personal data with us when you connect with us through social networking platforms or applications. Please refer to Section 8 below and also the privacy policy and settings of the social networking website or application to determine how you may adjust our permissions and manage the interactivity between us and your social networking account or your mobile device.

3. Your Rights

You can access, update, rectify, and delete your personal data which makes up some of your profile by logging into your account or contacting us here. Keeping your personal data current helps ensure that we can respect your preferences and offer you the goods and services that are most relevant to you.

In accordance with applicable law, you may (i) request access to any personal data we hold about you; (ii) request that it be updated, rectified, deleted or blocked; (iii) request that we delete personal data we hold about you; (iv) request that we restrict our processing of your personal data; and (v) request that we provide you or a third party with a copy of certain personal data about you (that is referred to as the right of "data portability"). You can also object to any of our uses of your personal data described in this policy, including our marketing activities. You may also revoke your consent to the processing of your personal data, to the extent consent was required and provided by you.

4. How We Use Information

We control and process the personal data you provide to us, which we collect from other sources, and which we generate to:

- Create your account when you sign up and log you in, which is necessary for us to provide our services to you in accordance with the [Terms of Use](#). If you make purchases without creating a password, we link these purchases to your email address and create a secure account in our systems. If you create a password at a later date, you will be able to see the past purchases made with a particular email address.
- Operate, maintain, and improve the Site by analysing how you and our other customers use and interact with it. This is to meet our legitimate business interests in providing the Site and ensuring that it provides the best experience for our customers.

- Validate, facilitate, and prevent fraudulent purchases. This may include processing orders for vouchers and other goods and services, payment verification, and verifying that vouchers redeemed by customers are valid. This is necessary to meet our contractual commitments to you set out in the [Terms of Use](#);
- Carry-out marketing, which may involve:
- Establishing and analysing individual and group profiles and customer behavior, in order to determine your or others interest in certain types of offers, products, and services. We do this by analysing your interactions with the Site and your other personal data (including personal data received from Business Partners) to determine what your interests are, and what sorts of products and services people with similar interests also buy, which helps us understand what products and services you may be interested in viewing. This is to meet our legitimate interests in understanding the types of products and services our customers are interested in, and to provide the most relevant products to you and our other customers;
- Showing relevant offers and advertising. We will use the profiles described above to create advertising for our products that will be displayed on relevant third-party sites. We do this to meet our legitimate interests in showing you products which may be relevant to you, and you can opt out of seeing these types of ads as described in our Cookies policy
- Sending you relevant direct marketing messages and other communications via email or push notifications on mobile devices, including, with your consent, using your location data to notify you of tailored location-based deals. We will either send these messages on the basis that you have consented to receiving them or, where permitted by applicable law, to meet our legitimate interests in showing you which of our products and services are relevant to you; and
- Analysing advertising effectiveness, which may involve analysing the advertising campaigns our customers choose to interact with most often. This is to meet our legitimate interests in understanding which types of advertising campaigns are more or less effective than others.
- Answer your questions and respond to your requests, for example in the context of customer service. This is to meet our contractual commitments to you in the [Terms of Use](#) where these questions or requests are part of the purchase process or to comply with legal obligations (such as allowing you to exercise your rights as described above), and in other cases to meet our legitimate interests in providing a good service to our customers;
- Send you reminders, technical notices, updates, security alerts, support and administrative messages, service bulletins, and requested information, including on behalf of Business Partners,, or other Sellers. This is to meet our legitimate interests in managing our relationship with you effectively;
- Administer rewards, surveys, sweepstakes, contests, or other promotional activities or events, in order to meet our contractual commitments to you set out in the terms and conditions of those promotional events;
- Manage our everyday business needs, such as administration of the Site, forum management, fulfillment, analytics, fraud prevention, and enforcement of our corporate reporting obligations and [Terms of Use](#) or to comply with the law; and
- Comply with our legal obligations, resolve disputes, and enforce our agreements. We do this where necessary to comply with legal obligations to which we are subject, or to meet our

legitimate interests in enforcing our legal rights and resolving disputes or verifying payments and preventing fraud.

5. When and Why We Disclose Personal Data

We share your personal data as follows:

- with your consent;
- with unaffiliated third-party Sellers and Business Partners, so they can sell, deliver, and provide the products or services purchased to you (e.g. to deliver products to you, or to provide a Getaways provider with your details so they can confirm reservations). We share personal data with unaffiliated third-party Sellers and Business Partners in order to meet our contractual obligations to you, and they are not permitted to use your personal data in any way other than for selling, delivering, and/or providing the products or services purchased by you;
- with third parties that provide tools and services to help us better understand your deal preferences, so that we can show you advertisements for Greek Select or Site vouchers, goods, or services on third party websites which are more suited to your interests and tastes. Those third parties may also use your personal data to match you with their existing customer base. You can stop our use of these tools in the ways described in our [Cookies Policy](#);
- to report or collect on debts owed to Sellers or other Business Partners;
- as necessary to perform contractual obligations towards you with Sellers or Business Partners to the extent you have purchased or redeemed a Greek Select or Site voucher, goods, or services offered by them or participated in an offer, rewards, contest or other activity or program sponsored or offered through us or the Sellers on behalf of a Business Partner;
- to a subsequent owner, co-owner, or operator of one or more of the Sites or any portion or operation related to part of one or more of the Sites;
- in connection with a corporate merger, consolidation, or restructuring, the sale of substantially all of our stock and/or assets, or other corporate change, including, without limitation, during the course of any due diligence process;
- to comply with legal orders and government requests, or as needed to support auditing, compliance, and corporate governance functions, where this is necessary to comply with these legal obligations;
- to combat fraud or criminal activity, and to protect our rights or those of, Sellers, or Business Partners, and users, or as part of legal proceedings affecting us, as it is in our legitimate interests to prevent fraud and protect these rights; or
- in response to a subpoena, or similar legal process, including to law enforcement agencies, regulators, and courts, to the extent this is necessary to comply with such legal obligations.

We encourage our unaffiliated third-party Sellers and Business Partners to adopt and post privacy policies. However, while we share personal data with Sellers and Business Partners only for the above-mentioned purposes, their subsequent processing and use of personal data obtained through us is governed by their own privacy policies and practices and is not under our control (except for the use and processing by Sellers and Business Partners providing services to us, as described above). Where possible, we contractually restrict how our Sellers and Business Partners, including merchants, use your

personal data and aim to ensure they do not use it for any purposes which are incompatible with those set out in this privacy statement.

In a number of the cases set out above, we will transfer your personal data to a country located outside the European Economic Area that may not be considered as providing the same level of protection for personal data under European law. In such cases, we put in place appropriate safeguards, including contractual commitments approved by the European Commission, on recipients of the data, to ensure that there is adequate protection for your personal data. For more information about the safeguards in place and to view a copy of such safeguards, please contact us using the details below.

6. Security of Personal Data

We have implemented an information security program that contains administrative, technical and physical controls that are designed to safeguard your personal data, including industry-standard encryption technology. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee its absolute security.

7. Retention of Personal Data

We will retain your personal data for as long as your account is active or as needed to provide you services. If you close your account, we will retain your personal data for a period where it is necessary to continue operating our business effectively, to maintain a record of your transactions for financial reporting purposes or fraud prevention purposes until these purposes no longer exist, and to retain as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

8. Social Networks

Social Community Areas

You may access the Site through, or the Site may contain connections to, areas where you may be able to publicly post information, communicate with others such as discussion boards or blogs, review products and merchants, and submit media content. Prior to posting in these areas, please read our [Terms of Use](#) carefully. All of the information you post may be accessible to anyone with Internet access, and any information you include in your posting may be read, collected, and used by others. For example, if you post your email address along with a public restaurant review, you may receive unsolicited messages from other parties. You should avoid publicly posting sensitive information about you or others.

Connecting through Social Networks

We offer social networking users the opportunity to interact with friends and to share on social networks. If you are logged into both the Site and a social network, when you use the Site's social networking connection functions, you will connect your social network account with your Greek Select or Site account (this happens automatically, if the email addresses match). If the email addresses do not match, we ask you if you want to link them and you must validate that you control the accounts by logging in to your social network account. If you are already logged into the Site but not into your social network site, when you use the Site's social network connection functions, you will be prompted to enter your social network website credentials or to sign up for the social network.

If you are not currently registered as a Greek Select and /or Site user and you use the Site's social network connection functions, you will first be asked to enter your social network credentials and then be given the option to register and join Greek Select. Once you register with us and connect with the

social network, you will be able to automatically post recent activity back to your social network. Please refer to the privacy settings in your social network account to manage the data that is shared through your account.

When you use the Site's social network connection function, you will have the opportunity to consent to our accessing all of the elements of your social network profile information that you have made available to be shared (as per the settings chosen by you in your social network profile) and to use it in accordance with the social network's terms of use and this Privacy Statement. You can withdraw this consent at any time.

9. Privacy Practices of Third Parties

This Privacy Statement only addresses the collection, processing and use (including disclosure) of personal data by us through your interaction with the Site. Other websites that may be accessible through links from the Site may have their own privacy statements and personal data collection, processing, use, and disclosure practices. Our Business Partners may also have their own privacy statements. We encourage you to familiarise yourself with the privacy statements provided by these other parties prior to providing them with information or taking advantage of a sponsored offer or promotion.

10. Contact Us

If you would like to make use of any of the above rights or any other rights in relation to your personal data please contact us via postal mail at the following address info@greeklist.co.uk

If you have any questions or comments about our privacy practices or this Privacy Statement please contact us via postal mail at the following address: Lower Ground Floor Office, 8 Shepherds Bush Road, London, England, W6 7PJ

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11. Other Contacts

We are committed to working with you to obtain a fair resolution of any request, complaint, or concern about our use of your personal data. If, however, you believe that we have not been able to assist you, you have the right to make a complaint to the data protection authority in your country of residence or to our Supervisory Authority: <https://ico.org.uk>

GREEK SELECT INTERNATIONAL LIMITED COOKIES POLICY

At Greek Select we are deeply committed to maintaining the trust and confidence of our customers. As part of that commitment, we believe that it is important to explain to you, as clearly as possible, how and when we use cookies and similar technologies on our websites and mobile applications (together, we call these the "Site") to collect and use your information.

WHAT ARE COOKIES?

Cookies are unique identifiers, usually made up of small bits of text or code that are placed on your device. Cookies are widely used by website owners and their partners to help websites operate, work more efficiently, and personalize the experience for you.

Cookies may be placed on your device by Greek Select, which are "first party" cookies. Cookies may also be placed on your device by a party other than Greek Select, such as our Business Partners. These are "third party" cookies.

When we say "Business Partners", we mean third parties with whom we conduct business, such as merchants, co-marketers, distributors, resellers, and other companies or organizations with whom we enter into agreements to support our business and operations, including advertising partners.

WHAT ARE COOKIES USED FOR?

The first and third party cookies on our Site provide various functions:

Essential Cookies: These cookies are essential for our Site to work properly. They include, for example, cookies that make it possible for you to browse and use our Site, such as cookies that remember you have logged in to your Greek Select account.

Functional Cookies: These cookies gather information about how visitors use the Site, monitor the Site's performance, and are used to recognize and remember your preferences. If you agree to receive emails from us, we also use them to track responses to emails we send you, and to track whether you opened or deleted an email. Functional cookies can also be used to identify and remedy operational problems with the Site.

Advertising Cookies: These cookies record your online activities, including your activities on our Site, such as the pages visited, and the links and advertisements clicked. These cookies are used to provide an engaging and easy online experience that is tailored to your interests by delivering personalised advertising content. For example, if you view a particular offer on our Site, we may work with our Business Partners to show you that offer, or a similar offer, on other sites.

The advertising cookies we use on our Site are placed by either Greek Select or our Business Partners. Any information collected by our Business Partners will be used in accordance with their own privacy policies. To learn more about advertising cookies, please visit <http://www.youronlinechoices.com/uk/>.

We also use cookies that allow you to make posts to social media sites. For example, you can post deals you have viewed or purchased directly to social media sites to share with your friends.

HOW LONG DO COOKIES STAY ON MY DEVICE?

Cookies are either classified as "Session Cookies" or "Persistent Cookies."

Session Cookies are stored temporarily and deleted once you close the browser window.

Persistent Cookies are stored on your device between browser sessions, and are beneficial because they allow us to remember your preferences and activities while on the Site. The length of time these cookies remain on your device will vary, as it depends on the specific cookie used.

HOW DO I MANAGE COOKIES?

You may also disable certain cookies through your browser settings. In particular, you can disable these cookies on Apple Safari (as described [here](#)), Google Chrome (as described [here](#)), Internet Explorer (as described [here](#)) and Mozilla Firefox (as described [here](#)). Please check your browser settings for more information. Within each browser, you can select the option to clear all cookies and other browsing data.

If you use the Site after you have cleared all cookies from your browser settings, cookies may be placed on your device again. To avoid having these cookies placed on your device again, you can opt-out as described above or by installing an application on your browser, such as Ghostery or PrivacyBadger, to ensure certain cookies are not placed on your device.

For advertising cookies, in addition to the tool provided above, you can also visit <http://www.youronlinechoices.com/uk/> and turn off certain cookies through the 'Your Ad Choices' page.

On mobile devices, you can also limit personalised advertising by reviewing and adjusting the setting provided by your device manufacturer, such as "[Limit Ad Tracking](#)" for Apple's iOS devices or "[Opt-out of interest-based ads](#)" for Android. You can opt out of all personalised advertising or reset your advertising ID, so you only see personalised advertising related to what you look at from the point you reset it.

PRIVACY

For more information on our approach to privacy, please visit our Privacy Statement.

WHAT IF I HAVE QUESTIONS?

If after reading this Cookies Policy you have any questions please contact: info@greeklist.co.uk