

# **BEE WORLD UK (JOLLIBEE) PRIVACY POLICY**

Bee World UK Limited trading as Jollibee (Jollibee, we) are committed to protecting your personal data and respecting your privacy.

Under data protection laws, we are required to provide you with certain information about who we are, how we process your personal data and for what purposes, and your rights in relation to your personal data.

The Jollibee mobile application (Jolliapp) is owned and operated by Jollibee, who are the “controller” of all stored data and are responsible for your personal data.

This policy, together with our MOBILE APP TERMS OF USE, explain how we may use information we collect about you, as well as your rights over any personal data we hold about you. Please read this policy and our MOBILE APP TERMS OF USE carefully. You can download a pdf version of the policy here:

<https://www.jollibee.uk/privacy-policy-pdf/>

## Index of Privacy Policy Clauses

1. Information we collect about you through Jolliapp.
2. How your information is collected
3. Using your information
4. Purposes for which we will use your information
5. Marketing communications
6. Data storage
7. Disclosing your information
8. International transfers
9. Your rights
10. Changes to our policy
11. Cookies
12. How you can withdraw consent
13. Contacting us

## **## 1. Information we collect about you through Jolliapp.**

We collect personal data about you when you:

- register to use Jolliapp;
- attempt to check in to our stores;
- register your debit or credit card details;
- upload a profile photo; and/or
- use the payments facility in Jolliapp to pay for your purchase.

More generally, we collect, use, store and transfer the following types of personal data about you:

- Identity Data includes first name,, last name, date of birth (optional), , profile photo.
- Contact Data includes address (home, postal or other physical address), email address and telephone numbers.

- Financial Data includes payment card details, however, please note that your card details are not stored on Jolliapp and they are only used in accordance with your payment instructions. Your card details are stored with our payment gateway partner - Judopay - who are a Level 1 certified PCI-DSS Service Provider. You have to use the payments facility within Jolliapp to pay for your purchase through the app.
- Transaction Data includes details about payments to and from you and details of in-App purchases.
- Device Data includes the type of mobile device you use, the device manufacturer, your mobile operating system..
- Content Data includes information stored on your Device, including photos for profile pictures if selected (photo required for certain features).
- Profile Data includes, your username and password, in-App purchase history, your interests, preferences, feedback and survey responses.

Usage Data includes information about how you use Jolliapp or your visits to any of our websites, including but not limited to traffic data and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access.

See also <https://www.apple.com/legal/privacy/en-ww/> and/or <https://policies.google.com/privacy>

- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- Location Data includes your current location disclosed by GPS technology .

Your personal data is stored in an encrypted database and transferred over a secure network connection. You decide which data you do and do not share with us. If you ask us to, we will update, correct or delete any data which you give to us.

## **## 2. How your information is collected**

We will collect and process the following data about you:

- Information you give us. This is information (including Identity, Contact, Financial, and Marketing and Communications Data) you consent to giving us about you by filling in forms on Jolliapp, or by corresponding with us (for example, by email or chat). It includes information you provide when you register to use Jolliapp, download or register Jolliapp, subscribe to any of our services, make an in-App purchase, share data via an App's social media functions, enter a competition, promotion or survey, or Jollibee reward schemes and when you report a problem with Jolliapp. If you contact us, we will keep a record of that correspondence.
- Information we collect about you and your device. Each time you use Jolliapp 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 policy [www.jollibee.uk/cookie-policy](http://www.jollibee.uk/cookie-policy) for further details.
- Location Data. We also use GPS technology to determine your current location. Some of our location-enabled services require your personal data for the feature to work. If you wish to use the particular feature, you will be asked to consent to your data being used for this purpose. You can withdraw your consent at any time by disabling Location Data in your settings.

### ## 3. Using your information

Collecting personal data in Jolliapp helps us to better understand what you need from us.

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, such as: - improve the functionality and performance of Jolliapp;
  - personalise our services to you;
  - tell you about important changes to Jolliapp and related services, and
  - manage promotions, competitions, customer surveys and questionnaires.
- where we need to comply with a legal or regulatory obligation.

Your personal data is safe with us and will never be released to third party companies for marketing purposes.

### ## 4. Purposes for which we will use your information

Purpose/activity	Type of data	Lawful basis for processing
To install the App and register you as a new App user	Identity Contact Financial Device	Your consent
To process in-App purchases and deliver Services including managing payments and collecting money owed to us	Identity Contact Financial Transaction Device Marketing and Communications Location	- Your consent (location) - Performance of a contract with you - Necessary for our legitimate interests (to recover debts due to us)
In-store 'check-in' (to identify which store you are in or near to allow you to pay using Jolliapp, and to provide an enhanced visitor experience, for example, through digital loyalty cards). Your profile photo is also used in store to verify your identity. If you ask us to, we will update, correct or delete your profile photo. However, you must have a profile photo if you wish to use Jolliapp to pay for your purchases in-store.	Location Identity (profile photo)	- Your consent

<p>To manage our relationship with you including notifying you of changes to the App or any Services</p>	<p>Identity Contact Financial Profile Marketing and Communications</p>	<ul style="list-style-type: none"> <li>- Your consent</li> <li>- Performance of a contract with you</li> <li>- Necessary for our legitimate interests (to keep records updated and to analyse how customers use our products/ Services)</li> <li>- Necessary to comply with legal obligations (to inform you of any changes to our terms and conditions)</li> </ul>
<p>To enable you to participate in our loyalty rewards schemes</p>	<p>Identity Contact Device Profile Marketing and Communications</p>	<ul style="list-style-type: none"> <li>- Your consent</li> <li>- Performance of a contract with you</li> <li>- Necessary for our legitimate interests (to analyse how customers use our products/Services and to develop them and grow our business)</li> </ul>
<p>To administer and protect our business and this App including troubleshooting, data analysis and system testing, and to make improvements to the app for the future</p>	<p>Identity Contact Device Location</p>	<ul style="list-style-type: none"> <li>- Your consent (in respect of Location Data)</li> <li>- Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security)</li> </ul>
<ul style="list-style-type: none"> <li>- To deliver content and advertisements to you</li> <li>- To make recommendations to you about goods or services which may interest you</li> <li>- To measure and analyse the effectiveness of the advertising we serve you</li> <li>- To monitor trends so we can improve the App</li> <li>- To understand how our customers use Jolliapp and how many customers use the different functions within Jolliapp</li> </ul>	<p>Identity Contact Device Content Profile Usage Marketing and Communications Location</p>	<ul style="list-style-type: none"> <li>- Your consent (in respect of Location Data)</li> <li>- Necessary for our legitimate interests (to develop our products/Services and grow our business)</li> </ul>
<p>To provide personalised offers and analyse which products and rewards are most likely to interest you.</p>	<p>Transaction</p>	<ul style="list-style-type: none"> <li>- Necessary for our legitimate interests (to develop our products/Services and grow our business)</li> </ul>

To contact you - with offers and information about Jollibee products or services; - for customer research, e.g. to help improve our service.	Contact Marketing and Communications	- Necessary for our legitimate interests (to develop our products/Services and grow our business)
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## ## 5. Marketing communications

We may use your Identity, Contact, Technical, and/or Usage Data of our customers to form a view on what we think our customers may want or need, or what may be of interest to them and in doing so we will only send information that is deemed relevant to their use of our services. This is necessary for our legitimate interests in growing and developing our business including our products and services. Customers will receive marketing communications from us if they have requested information from us or purchased services from us and, in each case, have not opted out of receiving that marketing. We will however ask for express consent before we share personal data with any third party for marketing purposes.

You can ask us to stop sending marketing communications at any time from the My Account menu within the app. You may refuse consent for marketing messages without detriment to any other areas of functionality within the app.

## ## 6. Data storage

Your data is stored in an encrypted database and transferred over secure network connections. We will store your information for as long as your account exists in Jolliapp. If your user account is entirely inactive for a period of 12 months or more, we will delete your account. If you ask us to, or if you delete your account, we will delete the information linked to your account which can identify you personally, including your profile photo and personal details in accordance with relevant privacy regulations and our internal guidelines.

You may ask us, at any time, to provide to you confirmation that your data is being processed and access to your personal data. This will generally be provided within 7-21 working days.

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 website; any transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorised access. We urge you to take every precaution to protect your personal data when you are on the internet.

## ## 7. Disclosing your information

Your personal data will only be disclosed to those of our employees or workers (which may include employees or workers at our head office) that have a need for such access for the purpose for which it was collected.

We will never disclose your information to anyone outside of Jollibee except:

- Where it is necessary for the performance of our contract with you, including where you have asked us to do so or where we need to take steps to enforce any contract which may be entered into between us
- Where we have your consent
- Where we are required or permitted to do so by law
- To other companies who provide a service to us as a processor under the terms of this privacy policy, such as PepperHQ Ltd which hosts and provides back-end support for Jolliapp and Judopay via unique identifiers for the purposes of payment and investigation of any transactional issues and Overnight Site limited trading as Sushi Social Media and FeeditBack for website improvement and business development purposes
- In order to protect the rights, property or safety of our business, our employees and workers, customers, suppliers and others. This includes exchanging information with other companies and organisations for the purposes of fraud prevention and credit risk reduction
- To any successors in title to our business.

We require all third parties that process personal data on our behalf to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **## 8. International transfers**

Some of our staff are based outside the UK so their processing of your personal data will involve a transfer of data outside the UK. Information sent outside of the UK will be anonymised wherever possible and be used for business development purposes only.

Whenever we transfer your personal data out of the UK, 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 UK.
- Where we use certain service providers, we may use specific contracts approved by the UK which give personal data the same protection it has in the UK.

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

## **## 9. Your 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 (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data that 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 that we hold about you corrected, although we may need to verify the accuracy of the new personal data that 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 personal data unlawfully or where we are required to erase your personal data to comply with local law. Please 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 personal data 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: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) 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 (d) 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. You can ask us to stop sending you marketing messages at any time by following the "unsubscribe" (or similar) links on any marketing message sent to you or by contacting us at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a purchase, product/service experience or other transactions.

To obtain a copy of the information we hold about you, or to exercise any of your other rights at any time, please email us at [hello@jollibee.uk](mailto:hello@jollibee.uk). Please confirm any details to help us identify and locate your information. If any of the details are incorrect, let us know and we will amend them.

You will not have to pay a fee to access your personal data or to exercise any of your other rights. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This

is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the United Kingdom's supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). However, we would like the opportunity to deal with your concerns before you approach the ICO, so please do not hesitate to contact us before taking this step.

## **## 10. Changes to our policy**

This policy replaces all previous versions and is correct as of 1 April 2021. We reserve the right to change the policy at any time.

## **## Third party links**

Jolliapp 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 these services.

## **## 11. Cookies**

The App does not use cookies or store cookies on your device. Our website uses cookies to distinguish you from other users of , our website, the distribution platform (Appstore) and to remember your preferences. This helps us to provide you with a good experience when you use the App or browse our website and also allows us to improve the App and our website. 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 [www.jollibee.uk/cookie-policy](http://www.jollibee.uk/cookie-policy).

## **## 12. How you can withdraw consent**

Once you provide consent by selecting "YES", you may change your mind and withdraw consent at any time by contacting us at the contact details set out below but that will not affect the lawfulness of any processing carried out before you withdraw your consent.

Bee World UK Limited t/a Jollibee

Email: [hello@jollibee.uk](mailto:hello@jollibee.uk)

Address: 180-182 Earls Court Road, London, SW5 9QG, United Kingdom



## **## 13. Contacting us**

If you have any queries, please contact us at

Bee World UK Limited t/a Jollibee

Email: [hello@jollibee.uk](mailto:hello@jollibee.uk)

Address: 180-182 Earls Court Road, London, SW5 9QG, United Kingdom