1. Introduction

1.1 This privacy policy explains what we do with your personal data. Please read it carefully because, by consenting to our privacy policy, you are consenting to the processing of your personal data as described in this policy.

1.2 For the purposes of the Data Protection Act 1998 ("DPA") and the General Data Protection Regulation ("GDPR"), the data controller is Belly Full Ltd, a company registered in England with company number 10724343. Our registered office is at Phoenix House, Phoenix Industrial Estate, Rosslyn Crescent, Harrow, England, HA1 2SP.

1.3 This privacy policy was last updated on 3rd October 2018. If we would like to change or update any of the material provisions of this privacy policy, we will get in contact by email or via the App, to make sure that you still agree to its terms.

2. How we collect personal data

2.1 We collect your personal data when you give it to us, for instance by signing up for an account with us, adding information to your profile or by contacting us.

2.2 If you are a Vendor, as part of the selection and on-boarding process of Vendors, we may use personal data from publicly available sources such as the internet.

3. The types of personal data we collect

3.1 If you are using our App as a Student, we collect the following basic kinds of personal data from you:

- your contact information such as name, email address and where you attend university;
- your payment card details from you;
- your location data using GPS.

3.2 If you are using our App as a Vendor, then we collect the following kinds of personal data from you:

- your contact information such as Vendor name, address and website details;
- the contact information of the authorised user(s) for the Vendor, including name, email address and contact telephone numbers;

- your location data using GPS.
- Financial details to process payments to you

3.3 Sensitive Personal Data

Some of that personal data that we collect may be classified as sensitive personal data under the DPA and the GDPR. For example, if you upload a photograph of yourself to your profile, that will reveal to us information about your ethnicity. We will treat sensitive personal data in accordance with our obligations under the DPA and GDPR.

4. Why we collect personal data and what we do with it

4.1 We will process your personal data to:

- create and administer your account with us;
- if you are a Student:
  o verify that you are a Student and have a student email address (this process will be carried out annually to verify that you are still a student);
  o create your profile on our App;
  o share your food order and personal details with a Vendor so that they can prepare your food for you and check that the correct person is collecting it;
  o share your written feedback and star rating with each Vendor; and
  o process payments from you;
- if you are a Vendor:
  o share your details with the Students so that they can order food from you and, if necessary, get in contact with you directly if they have any questions about the food that you offer or your restaurant;
  o create your profile on our App; and
  o process payments to you;
- provide our services; and
- communicate with you about our services.

4.2 Lawful basis for processing personal data

- Sensitive personal data: We will collect and process your sensitive personal data in this way only if (and for as long as) you have consented for us to do so. If you do not consent (or subsequently withdraw your consent) for us to collect and process your personal data in this way,

then we will not be able to carry out some of the tasks listed above and you will not be able to get the full benefit from the App.

- Non-sensitive personal data: We will collect and process your non-sensitive personal data as it is:

    o in the case of storing and processing your contact details and card payment details, necessary for the performance of our contract with you;

    o in the case of verifying if a user is a Student, in our legitimate interest to do so in order to ensure the service is not being used for people in respect of whom it was not intended; and

    o in the case of sharing feedback between Student and Vendor, in our legitimate interest to do so in order to ensure an efficient, high standard of service.

4.3 We will also process your personal data internally, to inform decisions about our business operations and strategy.

4.4 We will not use your personal data to market the products or services of unrelated third parties.

4.5 Retention Periods

We will only retain your personal data for 60 days once you have left our App, at which point all of your personal data will be deleted from our systems and records. If however, we become aware of a claim or dispute during such 60 day retention period, we shall retain your personal data for as long as is necessary in order to resolve such claim or dispute. In some cases, we will have a legal or statutory obligation to retain information for a set period. For example, for accounting records or for the prevention and detection of fraud.

4.6 We have appropriate technical and organisational measures in place in order to comply with the DPA and, when in force, the GDPR. These have been assessed by us as appropriate for the level of risk involved.

4.7 We will not transfer any of your personal data to a territory outside of either the UK or the EU where your personal data will be stored.

5. Who we share your personal data with

5.1 We may outsource some of our business operations to external providers, and share your personal data with them to the extent necessary for them to provide their services to us. We obtain

from them appropriate assurances about their treatment of your personal data and we ensure that they have appropriate technical and organisational measures in place to comply with the requirements of the DPA and, when in force, the GDPR.

5.2 If you are a Student, we will share your personal details with Vendors so that the Vendors can prepare your food for you and check that the correct person is collecting it.

5.3 If you are a Vendor, we will share your details with the Students so that they can order food from you and, if necessary, get in contact with you directly if they have any questions about the food that you offer or your restaurant.

5.4 We may also need to share your personal data with our professional advisers or regulators, or if the law otherwise requires it.

6. Your rights

6.1 **Right to object to direct marketing.** We will only send you marketing communications if you consent to us doing so. Except for information which you have specifically requested from us, our marketing communications will also provide you with a means to opt out of such communications in future. In any event, if you wish to stop receiving some or all marketing communications from us, you can let us know by email at info@belly-full.co.uk

6.2 You have the right to:

- **Amend/update/rectify**

Where your details are incorrect or require updating for example, you have changed your email address you have the right to have your details amended.

- **Right to restrict processing**

You have the right to restrict processing for example where information is inaccurate and needs to be rectified.

- **Right to object to processing**

You have the right to object to processing which is based on legitimate interest, direct marketing purposes (see paragraph 6.1 above) or for scientific/historical research and statistics.

- **Subject access**

You have a right to ask us for information we may hold about you. This is free of charge and we aim to respond as quickly as possible. Where applicable, we will verify your identity. Where a request is deemed excessive we may charge a small fee.

- **Portability**

You may ask us for a copy of your information in a readable format so that you can use it for your own purposes or with your permission to transfer the information we hold on you to a service provider.
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- **Right to erasure**

In certain circumstance you may ask us to delete your personal data. For example, when we have stopped processing your personal data, where you no longer require our services or where you withdraw consent.

If you would like to exercise one of these rights, you can email us on support@belly-full.co.uk or write to us at our registered office at the address above.

6.3 In addition to the rights listed above, you have the right to make a complaint to your local supervisory authority, which for the UK is the Information Commissioner's Office.

6.4 **Right to withdraw consent**. Where we rely on consent to process your personal data, you have the right to withdraw your consent at any time. You can do so by emailing us on support@belly-full.co.uk or write to us at our registered office at the address above. If you choose to do so, then we will not be able to carry out all of the tasks listed at paragraph 4.1 above and you will not be able to get the full benefit of the App.

7. Cookies

7.1 We use cookies on our App to enable you to log in to it. A cookie is a small file of letters and numbers that we put on your computer if you agree. These cookies allow us to distinguish you from other users of our App, which helps us to provide you with a good experience when you browse our App and also allows us to improve our App. By consenting to our use of cookies and continuing to use our App you are agreeing to our use of cookies.

7.2 We only use strictly necessary cookies on this App. These cookies are essential in order to enable you to move around the App and use its features, such as accessing secure areas of the App. Without these cookies services you have asked for, like shopping baskets, cannot be provided. A list of all the cookies used on this App by category is set out below:

Name	Purpose	More information
Google Analytics:	These cookies are used to estimate our audience size and usage pattern.	https://www.cookielaw.org/google-analytics-eu-cookie-law/
__utma Cookie	A persistent cookie - remains on a computer, unless it expires or the cookie cache is cleared. It tracks visitors. Metrics associated with the Google __utma cookie include: first visit (unique visit), last visit (returning visit). This also includes Days and Visits to purchase calculations which afford ecommerce websites with data intelligence around purchasing sales funnels.	
__utmb Cookie & __utmc Cookie	These cookies work in tandem to calculate visit length. Google __utmb cookie demarks the exact arrival time, then Google __utmc registers the precise exit time of the user. Because __utmb counts entrance visits, it is a session cookie, and expires at the end of the session, e.g. when the user leaves the page. A timestamp of 30 minutes must pass before Google cookie __utmc expires. Given __utmc cannot tell if a browser or website session ends. Therefore, if no new page view is recorded in 30 minutes the cookie is expired.	
_utmz Cookie	Cookie __utmz monitors the HTTP Referrer and notes where a visitor arrived from, with the referrer siloed into type (Search engine (organic or cpc), direct, social and unaccounted). From the HTTP Referrer the __utmz Cookie also registers, what keyword generated the visit plus geolocation data. This cookie lasts six months. In tracking terms this Cookie is perhaps the most important as it	

__utmv Cookie	will tell you about your traffic and help with conversion information such as what source / medium / keyword to attribute for a Goal Conversion. Google __utmv Cookie lasts "forever". It is a persistant cookie. It is used for segmentation, data experimentation and the __utmv works hand in hand with the __utmz cookie to improve cookie targeting capabilities.	
User Input	Store information about your preferences, and so allow us to customise our App and to provide you with offers that are targeted at your individual interests. Speed up your searches. Recognise you when you return to our App.	http://ec.europa.eu/ipg/basics/legal/cookies/index_en.htm
Multimedia content player	Used to store technical data to play back video or audio content, for the duration of a session.	
Session	Maintain session during user interaction with App.	http://phpquestionanswer.blogspot.in/2012/06/how-many-types-of-cookies-in-php.html

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