

Privacy Policy

This privacy notice for Redecoration Ltd (doing business as Redeco) ('Redeco', 'we', 'us', or 'our'), describes how and why we might collect, store, use, and/or share ('process') your ('you' or the 'user') information when you use our services ('App'), such as when you:

- Download and use our mobile application (Redeco), or any other application of ours that links to this privacy notice
- Engage with us in other related ways, including any sales, marketing, or events.

Personal data are any information relating to an identified or identifiable natural person, directly or indirectly, in particular by reference to an identifier, such as a name, an identification number, location data, an online identifier, or to one or more specific elements such as his or her physical, economical, cultural or social identify (the '**personal data**').

For users in the United Kingdom, we adhere to the GDPR as enshrined in the Data Protection Act 2018 known as the "Data Protection Act", in its current version, the purpose of this privacy policy (the "Policy") is to inform you about the data we collect about you, the processing we carry out and its purpose, the periods of retention of your data, the recipients of your data as well as the rights you have.

The Policy completes the contractual conditions which govern the Platform and which you accept by using the App (in particular the general conditions of use, as well as the other conditions which you accept for specific services or according to your status, hereafter together the '**Terms**').

Modification of the Policy: the Policy can be modified at any time. The current version is the one available on the Platform. In the event of a significant change to the Policy, we will inform you within a reasonable period of time (by email or by banner – or "push" – on the Platform).

Redeco may ask you at any time and by any means that can be recorded to confirm that you have read and understood the Policy.

Questions or concerns? Reading this privacy notice will help you understand your privacy rights and choices. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at dpo@redeco.app.

[Privacy Policy](#)

[Definitions](#)

[Summary of key points](#)

[1. What information do we collect?](#)

[Personal information you disclose to us](#)

[Information automatically collected](#)

[2. How do we process your information?](#)

[3. When and with whom do we share your personal information?](#)

[4. How do we handle your social logins?](#)

[5. How long do we keep your information?](#)

[6. How do we keep your information safe?](#)

[7. Do we collect information from minors?](#)

[8. What are your privacy rights?](#)

[Account Information](#)

[9. Do we make updates to this notice?](#)

[10. How can you contact us about this notice?](#)

[11. How can you review, update, or delete the data we collect from you?](#)

Summary of key points

This summary provides key points from our privacy notice, but you can find out more details about any of these topics by clicking on the link following each key point or by using our table of contents below to find the section you are looking for.

What personal information do we process? When you visit, use, or navigate our App, we may process personal information depending on how you interact with Redeco and the Services, the choices you make, and the products and features you use. Learn more about [personal information you disclose to us](#).

Do we process any sensitive personal information? We do not process sensitive personal information.

Do we receive any information from third parties? We may receive information from public databases, marketing partners, social media platforms, and other outside sources. Learn more about [information collected from other sources](#).

How do we process your information? We process your information to provide, improve, and administer our App, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent. We process your information only when we have a valid legal reason to do so. Learn more about [how we process your information](#).

In what situations and with which types of parties do we share personal information? We may share information in specific situations and with specific categories of third parties. Learn more about [when and with whom we share your personal information](#).

How do we keep your information safe? We have organisational and technical processes and procedures in place to protect your personal information. However, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Learn more about [how we keep your information safe](#).

How do you exercise your rights? The easiest way to exercise your rights is by visiting dpo@redeco.app, or by contacting us via our application "Help & Support" section. We will consider and act upon any request in accordance with applicable data protection laws.

Want to learn more about what Redeco does with any information we collect? Review the privacy notice in full.

1. What information do we collect?

Personal information you disclose to us

In Short: We collect personal information that you provide to us.

We collect personal information that you voluntarily provide to us when you register on the App, express an interest in obtaining information about us or our products and Services, when you participate in activities on the App, or otherwise when you contact us.

On our Platform the mandatory nature of the data to be provided is indicated to you at the time of collection. If you do not fill in the mandatory fields, we will not be able to provide you with all our Services.

Personal Information Provided by You. The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make, and the products and features you use. The personal information we collect may include the following:

- names
- phone numbers
- email addresses
- delivery pick-up and drop-off addresses
- usernames
- passwords
- contact or authentication data

Sensitive Information. We do not process sensitive information.

Payment Data. We may collect data necessary to process your payment if you make purchases, such as your payment instrument number, and the security code associated with your payment instrument. All payment data is stored by Stripe, Inc. You may find their privacy notice link(s) here: <https://stripe.com/gb>.

Social Media Login Data. We may provide you with the option to register with us using your existing social media account details, like your Facebook, Google, or Apple account. If you choose to register in this way, we will collect the information described in the section called '[HOW DO WE HANDLE YOUR SOCIAL LOGINS?](#)' below.

If you connect via Facebook – Facebook will provide us with your consent: Profile picture, First and last name, Gender, Email address, Date of birth.

Information about your sales: History of items put on sale, sold, refused; reason for refusal; deleted; reason for deletion; revenue generated on the App.

information about your purchases: History of orders and items, payment history on the App.

Information relating to the transportation of items: Delivery option; Address of the shipping point and the delivery point of the item; Tracking number of the item; Confirmation of the delivery of the item; Date and time of delivery of the item; Location of the item; Other delivery information required by a chosen

transportation service provider; In the event of a dispute with the carrier: a sworn statement and a copy of your ID.

Information relating to the management of the messages you write to us, the management of disputes and inappropriate behaviour: Messages (requests, complaints) sent to customer service or by contacting us on social networks (private or public message, including by "tagging" us); Type of warning received by the user; Date of receipt of the warning by the user; Information contained in judicial requests; Complaint from a user (content, reason, date and time).

Application Data. If you use our application(s), we also may collect the following information if you choose to provide us with access or permission:

Geolocation Information. We may request access or permission to track location-based information from your mobile device, either continuously or while you are using our mobile application(s), to provide certain location-based services. If you wish to change our access or permissions, you may do so in your device's settings.

Push Notifications. We may request to send you push notifications regarding your account or certain features of the application(s). If you wish to opt out from receiving these types of communications, you may turn them off in your device's settings.

This information is primarily needed to maintain the security and operation of our application(s), for troubleshooting, and for our internal analytics and reporting purposes.

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

Information automatically collected

In Short: Some information — such as your Internet Protocol (IP) address and/or browser and device characteristics — is collected automatically when you visit our App.

We automatically collect certain information when you visit, use, or navigate the App. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our App, and other technical information. This information is primarily needed to maintain the security and operation of our App, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies.

The information we collect includes:

- **Log and Usage Data.** Log and usage data is service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use our App and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type, and settings and information about your activity in the App (such as the date/time stamps associated with your usage, pages and files viewed, searches, and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called 'crash dumps'), and hardware settings).
- **Device Data.** We collect device data such as information about your computer, phone, tablet, or other device you use to access the App. Depending on the device used, this device data may include information such as your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model, Internet service provider and/or mobile carrier, operating system, and system configuration information.

- **Location Data.** We collect location data such as information about your device's location, which can be either precise or imprecise. How much information we collect depends on the type and settings of the device you use to access the App. For example, we may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address). You can opt out of allowing us to collect this information either by refusing access to the information or by disabling your Location setting on your device. However, if you choose to opt out, you may not be able to use certain aspects of the App.
- **Mobile Device Data.** We automatically collect device information (such as your mobile device ID, model, and manufacturer), operating system, version information and system configuration information, device and application identification numbers, browser type and version, hardware model Internet service provider and/or mobile carrier, and Internet Protocol (IP) address (or proxy server). If you are using our application(s), we may also collect information about the phone network associated with your mobile device, your mobile device's operating system or platform, the type of mobile device you use, your mobile device's unique device ID, and information about the features of our application(s) you accessed.

2. How do we process your information?

In Short: We process your information to provide, improve, and administer our App, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent.

We process your personal information for a variety of reasons, depending on how you interact with our App, including:

- **To facilitate account creation and authentication and otherwise manage user accounts.** We may process your information so you can create and log in to your account, keep your account in working order, as well as deletion of the account.
- **To enter into contracts with us.** We may process your information so you can start using our products and Services.
- **To deliver and facilitate delivery of App to the user.** We may process your information to provide you with the requested App. This also includes presenting you content, products and information that may be of interest to you. We have a legitimate interest in providing you the best possible user experience and improving our App, services and features.
- **To respond to user inquiries/offer support to users.** We may process your information to respond to your inquiries and solve any potential issues you might have with the requested service.
- **To send administrative information to you.** We may process your information to send you details about our products and Services, changes to our Terms and Conditions, the Policy, our commission grid, and other similar information.
- **To display your listing on the App.** We may process your information to create Product Card(s), remind you of the Item(s) being listed on your account, and make them available for sale on the App.
- **To fulfill and manage your orders.** We may process your information to fulfill and manage your purchases, sales payments, returns, and exchanges made through the App.
- **To request additional information.** We may process your information to notify you when Redeco and/or our partners need to carry out some additional verifications.
- **To allow you to make deliveries via our carrier .** We may process your information to allow you to arrange collection and delivery through the App.

- **To enable user-to-user communications.** We may process your information if you choose to use any of our offerings that allow for communication with another user. To enable such service, you should allow other users to have access to certain information about you, like user name and User Profile, as we have legitimate interest in building trust between users, between our users and us, and enable everyone to make environmentally responsible choices, and to facilitate user satisfaction on the Platform.
- **To solve issues and litigation, send warnings, temporarily or permanently suspend a user account, e.g.** by emails and notifications, as we have a legitimate interest in fighting inappropriate behaviour and illegal content, ensuring compliance with our Terms and Conditions, fighting fraud and counterfeiting, ensuring the security of the Platform and users, resolving disputes between our users and to defend the rights and interest of Redeco.
- **To request feedback.** We may process your information when necessary to request feedback and to contact you about your use of our App. You are free to participate or not, without any consequences. Your answers are then processed on the basis of your consent.
- **To send you marketing and promotional communications.** We may process the personal information you send to us for our marketing purposes, if this is in accordance with your marketing preferences. You can opt out or adjust your marketing emails preferences at any time. For more information, see '[WHAT ARE YOUR PRIVACY RIGHTS?](#)' below.
- **To evaluate and improve our App, products, marketing, and your experience.** We may process your information when we believe it is necessary to identify usage trends, determine the effectiveness of our promotional campaigns, and to evaluate and improve our Services, products, marketing, and your experience.
- **To identify usage trends.** We may process information about how you use our App to better understand how they are being used so we can improve them.
- **To improve and implement detection measures to fight against fraud,** particularly transactions, and, in case of detected anomalies, to give rise to an automatic suspension of your transaction. A review is then carried out by Redeco team which may contact you to verify your identity. We have legitimate interest in guaranteeing the security of the App and that of users and to fight against all forms of fraud.
- **To determine the effectiveness of our marketing and promotional campaigns.** We may process your information to better understand how to provide marketing and promotional campaigns that are most relevant to you.

We process your personal data to comply with our legal and regulatory obligations, this includes cooperation with the tax or judicial authorities acting in particular in the context of their control and investigation missions; to keep certain documents such as your invoices even after your account has been closed; to verify the identity of sellers and, if applicable, buyers.

We also process your personal data based on our legitimate interests. In order to legally base a processing operation on legitimate interest, three cumulative conditions must be met:

- The interest pursued must be legitimate (i.e. lawful, clearly and precisely determined, real and present);
- The processing carried out must be necessary and;
- The processing must not adversely affect the rights and interest of data subjects.

For your complete information, we detail below the processing operations and the corresponding legitimate interests. We have ensured that these processing operations do not infringe your fundamental rights and freedoms.

3. When and with whom do we share your personal information?

In Short: We may share information in specific situations described in this section and/or with the following categories of third parties.

Vendors, Consultants, and Other Third-Party Service Providers. We may share your data with third-party vendors, service providers, contractors, or agents ('**third parties**') who perform services for us or on our behalf and require access to such information to do that work. We have contracts in place with our third parties, which are designed to help safeguard your personal information. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will also not share your personal information with any organisation apart from us. They also commit to protect the data they hold on our behalf and to retain it for the period we instruct. The categories of third parties we may share personal information with are as follows:

- Cloud Computing Services Data Analytics Services
- Data Storage Service Providers Payment Processors
- Product Engineering & Design Tools
- User Account Registration & Authentication Services Sales & Marketing Tools
- Performance Monitoring Tools
- Authorised third parties, in particular in the context of investigation of offences
- Third parties, buyers or investors, in the event of a restructuring of the Redeco, including the total or partial sale of assets, mergers, acquisitions, spin-offs and, more generally, any capital operation;
- Public bodies and the tax authorities in the context of our legal obligations

We also may need to share your personal information in the following situations:

Business Transfers. We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

Business Partners. We may share your information with our business partners to offer you certain products, services, or promotions.

4. How do we handle your social logins?

In Short: If you choose to register or log in to our App using a social media account, we may have access to certain information about you.

Our App offers you the ability to register and log in using your third-party social media account details (like your Facebook, Apple or Google logins). Where you choose to do this, we will receive certain profile information about you from your social media provider. The profile information we receive may vary depending on the social media provider concerned, but will often include your name, email address, friends list, and profile picture, as well as other information you choose to make public on such a social media platform.

We will use the information we receive only for the purposes that are described in this privacy notice or that are otherwise made clear to you on the relevant App. Please note that we do not control, and are not responsible for, other uses of your personal information by your third-party social media provider. We recommend that you review their privacy notice to understand how they collect, use, and share your personal information, and how you can set your privacy preferences on their sites and apps.

5. How long do we keep your information?

In Short: We keep your information for as long as necessary to fulfill the purposes outlined in this privacy notice unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements).

Depending on the purpose, the data is kept for various periods of time, therefore if:

- The data is collected and used for creation and the management of your account it is kept during all the duration of the commercial relationship and until your account is deleted;
- The data is related to the sending of newsletters and alerts it is kept as long as you do not withdraw your consent by unsubscribing;
- The data is collected in the context of our legal, fiscal and accounting obligations and it is kept for the applicable legal, fiscal and accounting retention periods. For example invoices are kept for 10 (ten) years.
- The data is collected in the context of tax reporting obligations it is kept until they are sent to the tax authorities once a year, and then achieved of the strict limitation periods applicable;
- The data is related to the management of complaints, disputes and litigation it is kept for the duration necessary to resolve and dispute and the duration of any applicable statute of limitations;
- The documents are necessary for the identity verifications which take place within the framework of the fight against fraud and preserved during the time necessary for the verifications and are removed within 3 (three) days;
- The answers to surveys are kept for the time necessary for the survey, and are then anonymised if they were not already;
- The data collected can be kept in a form that does not allow your identification (anonymisation) for analytics and statistics purposes, it is stored without limitation of duration;

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

6. How do we keep your information safe?

In Short: We aim to protect your personal information through a system of organisational and technical security measures.

We have implemented appropriate and reasonable technical and organisational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts

to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our App is at your own risk. You should only access the App within a secure environment.

7. Do we collect information from minors?

In Short: *We do not knowingly collect data from or market to children under 13 years of age.*

We do not knowingly solicit data from or market to children under 13 years of age. By using the App, you represent that you are at least 13 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the App. If we learn that personal information from users less than 13 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from children under age 13, please contact us at dpo@redeco.app.

8. What are your privacy rights?

In Short: *You may review, change, or terminate your account at any time.*

If you are located in the EEA or UK and you believe we are unlawfully processing your personal information, you also have the right to complain to your [Member State data protection authority](#) or [UK data protection authority](#).

If you are located in Switzerland, you may contact the [Federal Data Protection and Information Commissioner](#).

Withdrawing your consent: If we are relying on your consent to process your personal information, which may be express and/or implied consent depending on the applicable law, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us by using the contact details provided in the section '[HOW CAN YOU CONTACT US ABOUT THIS NOTICE?](#)' below.

However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, when applicable law allows, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

Opting out of marketing and promotional communications: You can unsubscribe from our marketing and promotional communications at any time by clicking on the unsubscribe link in the emails that we send, or by contacting us using the details provided in the section '[HOW CAN YOU CONTACT US ABOUT THIS NOTICE?](#)' below. You will then be removed from the marketing lists. However, we may still communicate with you — for example, to send you service-related messages that are necessary for the administration and use of your account, to respond to service requests, or for other non-marketing purposes.

Important information on identity checks: In case of doubt or to fight fraud, we may ask you for proof of identity, address, purchase/sale or bank card. We will tell you how to provide us with these documents so that only the information we strictly need is transmitted to us (e.g.: copy of the identity card in black and white, photograph of part of a document, etc.). Only the departments that need to see these documents will process your data. We only keep these documents for the time necessary to verify them and then delete them immediately.

Account Information

If you would at any time like to review or change the information in your account or terminate your account, you can:

- Log in to your account settings and update your user account.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our legal terms and/or comply with applicable legal requirements.

If you have questions or comments about your privacy rights, you may email us at dpo@redeco.app.

9. Do we make updates to this notice?

In Short: Yes, we will update this notice as necessary to stay compliant with relevant laws.

We may update this privacy notice from time to time. The updated version will be indicated by an updated 'Revised' date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

10. How can you contact us about this notice?

If you have questions or comments about this notice, you may email us at dpo@redeco.app or contact us by post at:

Redecoration Ltd
71-75 Shelton Street
London
WC2H 9JQ
England

11. How can you review, update, or delete the data we collect from you?

Based on the applicable laws of your country, you may have the right to request access to the personal information we collect from you, change that information, or delete it. To request to review, update, or delete your personal information, please visit: dpo@redeco.app.