

Privacy Policy

Last updated - 11 March 2021

1. Who we are

We are Reblo AS, a private limited company registered in Norway. Our company registration number is 924 973 250 and our registered office is at 3 Sverdrups Gate, 0559, Oslo, Norway.

Reblo AS operates a website (wamapp.io, wamapp.no, wamapp.uk and wamapp.co.uk and other relevant domains) (“**Website**”) and a mobile application for iOS and Android (“**App**”) under the name “WAM” whereby customers (each a “**Gift Sender**”) can purchase one or more gifts for their loved ones (each a “**Gift Recipient**”) by choosing from a selection of products or services made available on our App by participating businesses (collectively the “**Services**”).

For the purposes of this privacy policy, “WAM”, “we”, “us” or “our” refers to Reblo AS and “you” or “your” refers to any person who accesses or uses the Services.

This privacy policy will explain how we collect, store and use personal data about you when you visit our Website or App, use our Services or otherwise provide your personal data to us. It provides you with details about the types of personal data that we collect from you, how we use your personal data and the rights you have to control our use of your personal data.

We value your privacy and process your personal data in accordance with the EU’s General Data Protection Regulation (“**GDPR**”).

2. What data do we collect?

We collect any information you enter on our Website or App or provide us with in any other way, including but not limited to, subscribing to our mailing list, setting up an account on our App, buying products or services from our App, completing customer surveys or otherwise interacting with us.

In order to be able to operate our business, we collect both “personal data” (i.e. data that can be used, directly or indirectly, alone or together with other data, to identify you as an individual customer) and “other information” (i.e. data that is anonymous, aggregate, de-identified, or otherwise does not reveal your identity).

Website

When you subscribe to our mailing list on our Website, we collect your name, email address, age and the city /country in which you live.

App

The personal data we will collect in a typical transaction on our App will include (but is not limited to) the following: (i) Gift Sender’s full name and telephone number (ii) Gift Recipient’s full name and telephone number (iii) message from the Gift Sender to the Gift Recipient (iv) details of the transaction

including (but not limited to) the product or service gifted, amount paid, transaction ID and the date of the transaction.

Users of our App will be identified by their phone number and authentication will not involve the use of a password but rather a single-use code sent by text message.

General

In addition to the above, we may collect some or all of the following personal data from you:

- your communications with us
- your preferences about receiving communications from us
- your comments, feedback and reviews
- information about your use of our Website or App, your browsing and online purchasing activities and any details we may ask you to submit to verify your identity / the data we collect

We may also collect some of this personal data from third parties who have your consent to pass your details to us. In order to take advantage of our Services on our App, you may need to supply us with the personal details of a third party (for example, a Gift Sender will need to give us the name and telephone number of the Gift Recipient in order to be able to send them a gift). We will not use this information for anything other than providing the Services for which the information was supplied.

Other information

We may collect other information about your use of our Website and / or App. This includes, for example, your device type, carrier provider, browser type, operating system, internet domain and host name, URL and date and time of access.

Further, we may also use software tools to measure and collect session information, including (but not limited to) page response times, length of visits to certain pages, page interaction information, searches you undertake and methods used to browse away from the page.

3. How will we use your personal data?

We use the data we collect to operate our business, advertise and improve our existing Services, develop new services and to improve and personalise your experiences interacting with us.

Your personal data will be collected, processed and used by us and may be passed to and processed by other data processors acting under contract with us. We may process your personal data in order to:

- provide the Services to you in accordance with our terms and conditions (“**Terms**”)
- contact you by email and mobile communication (such as text message or push notification)
- associate your account and your product purchases with you and to verify your identity
- pass your product order for delivery by third party deliverers engaged by us
- provide customer support and improve your customer experience
- comply with any applicable laws and regulations

For legitimate business reasons we will also process your data for customer satisfaction and customer experience improvement purposes, such as by analysing data we hold about you, and combining it with data held by third parties, in order to discern your interests, demography and other factors, and in consequence to offer goods and services that are likely to have the greatest value to you. We would also use this data in connection with the prevention and detection of fraud and other crime.

We may use automatically collected anonymous information about your use of WAM. For example, we may automatically log which parts of WAM you access, which web browser you deploy and the website from which you linked to WAM. You cannot be identified from any of this information. It enables us to compile statistics about the use of WAM and to help target aspects of WAM and advertising to you more accurately.

4. How is your personal data stored?

It is important to us that unauthorised individuals do not gain access to your personal data. We have therefore taken technical and organisational measures to guard against unauthorised or unlawful processing of your personal data and against accidental loss or destruction of, or damage to, your personal data. We believe the measures implemented on our Website and App reduce the likelihood of security problems to a level appropriate to the type of data involved.

Third party providers

Website: WAM is hosted on the Wix.com platform. Wix.com provides us with the online platform for our Website. Your data may be stored through wix.com's data storage, databases and the general wix.com applications. They store your data on secure servers behind a firewall.

Payment platform: Your credit card or debit card details will not be stored by WAM, but instead they will be stored by a payment service provider under contract with us, called Stripe Connect. Stripe Connect uses "industry standard" encryption both in communication with web applications, apps and internal systems. Credit / debit card data (card number, expiration date and CCV) are, in case users choose to save them for later use, stored in separate environments. They are saved and retrieved with the use of "tokenisation", meaning an anonymous key is saved on the device used to enter payment information. This key is then able to retrieve data in a non-identifying matter.

5. For how long is your personal data stored?

WAM will retain your personal data for as long as you maintain an account or as needed to provide you with the Services. We will also retain and use your personal data as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

6. Who is responsible for your personal data?

WAM is the controller of the personal data you submit to us and is responsible for your Personal Data under the GDPR.

7. Disclosing your personal data

We will not disclose any of your personal data, other than to companies under contract with us. To enable us to provide our service, we may share data with the following categories of organisations:

- information technology (hardware and software) companies
- payment processing companies
- manufacturers, wholesalers and retailers
- delivery and courier services
- fraud prevention companies

We will not share your data with any other categories of organisation without your permission unless:

- we are legally entitled to do so (for example, pursuant to a court order or for the purposes of prevention or detection of crime or fraud)
- we are in negotiations with a third party for the sale or purchase of any of WAM's business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets
- WAM, or substantially all of its assets, is acquired by a third party, in which case personal data held by WAM about its customers will be one of the transferred assets
- We wish to enforce or apply our Terms and other agreements to which you are party, or to protect our rights, property, safety, customers, or others

8. Marketing

If you have subscribed to our mailing list on our Website, then we will send you information about our latest news and offers via emails and mobile communication (such as text messages and "push" notifications). If you no longer wish to be contacted for marketing purposes, please send an email to: hey@wamapp.io. Alternatively, you can click "unsubscribe" on any email you receive from us.

You can also choose on the App to receive reminders on certain special occasions reminding you to send your friend a gift. You can control these on the "reminders" section of the App.

9. What are your data protection rights?

We would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

Right to access – You have the right to receive a copy of your data free of charge (known as a subject access request)

Right to rectification – You have the right to request that we correct any information you believe is inaccurate

Right to erasure – You have the right to request that we erase your personal data, in certain circumstances

Right to restrict processing – You have the right to request that we restrict the processing of your personal data, in certain circumstances

Right to withdraw consent – You have the right to withdraw consent at any time when that is the legal basis for our processing

Right to data portability – You have the right to request that WAM transfers the data that we have collected to another organisation, or directly to you, in certain circumstances

If you would like to exercise any of these rights, please contact our designated data protection officer by email at: help@wamapp.io

10. Under 18s

Persons under the age of 18 years old are not eligible to use our Services and we ask that individuals under the age of 18 do not submit any personal data to us or use the Services. Although persons of any age may navigate through our Website or App, we do not knowingly collect or request personal information from those under the age of 18 without parental consent. If it comes to our attention that a person under the age of 18 has an account on our App, we will cancel that person's account and, to the extent possible in accordance with applicable laws, delete any personal data we hold for that person.

11. Privacy policies of other websites

Our Website or App may, from time to time, contain links to other third party websites. Please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for those websites or their policies.

12. Changes to our privacy policy

WAM keeps its privacy policy under regular review and places any updates on this web page and on our App. This privacy policy was last updated on the "Last Updated" date shown above. Please check back regularly to keep informed of changes to this policy.

13. How to contact us

If you have any questions about our privacy policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us at: help@wamapp.io

14. How to contact the appropriate authority

Should you wish to make a complaint or if you feel that we have not addressed your concern in a satisfactory manner, you may contact the Norwegian Data Protection Authority. Details on how to contact them can be found here: <https://www.datatilsynet.no>