

# Privacy Policy

---

Thank you for choosing to be part of our community at SPQT Investments Limited, doing business as Kabcompare ("Kabcompare", "we", "us", "our"). We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about this privacy notice, or our practices with regards to your personal information, please contact us at [hello@kabcompare.com](mailto:hello@kabcompare.com).

When you use our mobile application, as the case may be (the "App") and more generally, use any of our services (the "Services", which include the App), we appreciate that you are trusting us with your personal information. We take your privacy very seriously. In this privacy notice, we seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this privacy notice that you do not agree with, please discontinue use of our Services immediately.

This privacy notice applies to all information collected through our Services (which, as described above, includes our App), as well as any related services, sales, marketing or events.

Please read this privacy notice carefully as it will help you understand what we do with the information that we collect.

## TABLE OF CONTENTS

1. WHAT INFORMATION DO WE COLLECT?
2. HOW DO WE USE YOUR INFORMATION?
3. WILL YOUR INFORMATION BE SHARED WITH ANYONE?
4. WHO WILL YOUR INFORMATION BE SHARED WITH?
5. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?
6. DO WE USE GOOGLE MAPS PLATFORM APIS?
7. HOW DO WE HANDLE YOUR SOCIAL LOGINS?
8. HOW LONG DO WE KEEP YOUR INFORMATION?
9. HOW DO WE KEEP YOUR INFORMATION SAFE?
10. WHAT ARE YOUR PRIVACY RIGHTS?
11. CONTROLS FOR DO-NOT-TRACK FEATURES
13. DO WE MAKE UPDATES TO THIS NOTICE?
14. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?
15. HOW CAN YOU REVIEW, UPDATE OR DELETE THE DATA WE COLLECT FROM YOU?

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.

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

**Personal Information Provided by You.** We collect names; phone numbers; email addresses; mailing addresses; usernames; passwords; billing addresses; debit/credit card numbers; and other similar information.

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

**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, Twitter, or other social media 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.

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. Note however, if you choose to opt out, you may not be able to use certain aspects of the Services.

Information collected through our App

In Short: We collect information regarding your geo-location, mobile device, push notifications, when you use our App.

If you use our App, we also collect the following information:

- ♣ **Geo-Location Information.** We may request access or permission to and track location-based information from your mobile device, either continuously or while you are using our App, to provide certain location-based services. If you wish to change our access or permissions, you may do so in your device's settings.

♣ Mobile Device Access. We may request access or permission to certain features from your mobile device, including your mobile device's camera, sensors, SMS messages, social media accounts, and other features. If you wish to change our access or permissions, you may do so in your device's settings.

♣ 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 App, 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 App you accessed.

♣ Push Notifications. We may request to send you push notifications regarding your account or certain features of the App. 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 App, for troubleshooting and for our internal analytics and reporting purposes.

## 2. HOW DO WE USE YOUR INFORMATION?

In Short: We process your information for purposes based on legitimate business interests, the fulfilment of our contract with you, compliance with our legal obligations, and/or your consent.

We use personal information collected via our App for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests, to enter into or perform a contract with you, with your consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

♣ To facilitate account creation and logon process. If you choose to link your account with us to a third-party account (such as your Google or Facebook account), we use the information you allowed us to collect from those third parties to facilitate account creation and logon process for the performance of the contract. See the section below headed "HOW DO WE HANDLE YOUR SOCIAL LOGINS" for further information.

- ♣ To post testimonials. We post testimonials on our App that may contain personal information. Prior to posting a testimonial, we will obtain your consent to use your name and the content of the testimonial. If you wish to update, or delete your testimonial, please contact us at [hello@kabcompare.com](mailto:hello@kabcompare.com) and be sure to include your name, testimonial location, and contact information.
- ♣ Request feedback. We may use your information to request feedback and to contact you about your use of our App.
- ♣ To enable user-to-user communications. We may use your information to enable user-to-user communications with each user's consent.
- ♣ To manage user accounts. We may use your information for the purposes of managing our account and keeping it in working order.
- ♣ To send administrative information to you. We may use your personal information to send you product, service, and new feature information and/or information about changes to our terms, conditions, and policies.
- ♣ To protect our Services. We may use your information as part of our efforts to keep our App safe and secure (for example, for fraud monitoring and prevention).
- ♣ To enforce our terms, conditions, and policies for business purposes, to comply with legal and regulatory requirements or in connection with our contract.
- ♣ To respond to legal requests and prevent harm. If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.
- ♣ Fulfil and manage your orders. We may use your information to fulfil and manage your orders, payments, returns, and exchanges made through the App.
- ♣ Administer prize draws and competitions. We may use your information to administer prize draws and competitions when you elect to participate in our competitions.
- ♣ To deliver and facilitate delivery of services to the user. We may use your information to provide you with the requested service.
- ♣ To respond to user inquiries/offer support to users. We may use your information to respond to your inquiries and solve any potential issues you might have with the use of our Services.

- ♣ To send you marketing and promotional communications. We and/or our third-party marketing partners may use the personal information you send to us for our marketing purposes if this is in accordance with your marketing preferences. For example, when expressing an interest in obtaining information about us or our App, subscribing to marketing or otherwise contacting us, we will collect personal information from you. You can opt-out of our marketing emails at any time (see the "WHAT ARE YOUR PRIVACY RIGHTS" below).

- ♣ Deliver targeted advertising to you. We may use your information to develop and display personalized content and advertising (and work with third parties who do so) tailored to your interests and/or location and to measure its effectiveness.

- ♣ For other business purposes. We may use your information for other business purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our App, products, marketing, and your experience. We may use and store this information in aggregated and anonymized form so that it is not associated with individual end users and does not include personal information. We will not use identifiable personal information without your consent.

### 3. WILL YOUR INFORMATION BE SHARED WITH ANYONE?

In Short: We only share information with your consent, to comply with laws, to provide you with services, to protect your rights, or to fulfil business obligations.

We may process or share your data that we hold based on the following legal basis:

- ♣ Consent: We may process your data if you have given us specific consent to use your personal information for a specific purpose.

- ♣ Legitimate Interests: We may process your data when it is reasonably necessary to achieve our legitimate business interests.

- ♣ Performance of a Contract: Where we have entered a contract with you, we may process your personal information to fulfil the terms of our contract.

- ♣ Legal Obligations: We may disclose your information where we are legally required to do so to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).

♣ Vital Interests: We may disclose your information where we believe it is necessary to investigate, prevent, or act regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

More specifically, we may need to process your data or 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.

♣ Vendors, Consultants and Other Third-Party Service Providers. We may share your data with third-party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such information to do that work. Examples include: payment processing, data analysis, email delivery, hosting services, customer service and marketing efforts. We may allow selected third parties to use tracking technology on the App, which will enable them to collect data on our behalf about how you interact with our App over time. This information may be used to, among other things, analyse and track data, determine the popularity of certain content, pages or features, and better understand online activity. Unless described in this notice, we do not share, sell, rent or trade any of your information with third parties for their promotional purposes. We have contracts in place with our data processors, 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 organization apart from us. They also commit to protect the data they hold on our behalf and to retain it for the period we instruct.

#### 4. WHO WILL YOUR INFORMATION BE SHARED WITH?

In Short: We only share information with the following third parties.

We only share and disclose your information with the following third parties. We have categorized each party so that you may be easily understand the purpose of our data collection and processing practices. If we have processed your data based on your consent and you wish to revoke your consent, please contact us using the contact details provided in the section below titled "HOW CAN YOU CONTACT US ABOUT THIS NOTICE?".

♣ Advertising, Direct Marketing, and Lead Generation

Google AdSense

♣ Allow Users to Connect to Their Third-Party Accounts

Facebook account and Google account

♣ Communicate and Chat with Users

Facebook Customer Chat

♣ Functionality and Infrastructure Optimization

Cloud Functions for Firebase and Cloud Storage for Firebase

♣ Invoice and Billing

Stripe

♣ Retargeting Platforms

Facebook Remarketing, Facebook Custom Audience, Google Ads Remarketing and Google Analytics Remarketing

♣ Social Media Sharing and Advertising

Facebook advertising

♣ User Account Registration and Authentication

Facebook Login and Google Sign-In

♣ Web and Mobile Analytics

Google Analytics

♣ Website Testing

Google Play Console and TestFlight

## 5. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

In Short: We may use cookies and other tracking technologies to collect and store your information.

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Notice.

## 6. DO WE USE GOOGLE MAPS PLATFORM APIS?

In Short: Yes, we use Google Maps Platform APIs for the purpose of providing better service.

This App uses Google Maps Platform APIs which are subject to Google's Terms of Service. You may find the Google Maps Platform Terms of Service here. To find out more about Google's Privacy Policy, please refer to this link.

We use certain Google Maps Platform APIs to retrieve certain information when you make location-specific requests. This includes:

- ♣ Location Information
- ♣ Frequently Used Locations

For a full list of what we use information for, please see the previous section titled "HOW DO WE USE YOUR INFORMATION?" and "WILL YOUR INFORMATION BE SHARED WITH ANYONE?". We obtain and store on your device ('cache') your location. You may revoke your consent anytime by contacting us at the contact details provided at the end of this document.

The Google Maps Platform APIs that we use store and access cookies and other information on your devices. If you are a user currently in the European Economic Area (EU countries, Iceland, Liechtenstein and Norway), please take a look at our Cookie Notice.

## 7. HOW DO WE HANDLE YOUR SOCIAL LOGINS?

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

Our App offers you the ability to register and login using your third-party social media account details (like your Facebook or Twitter 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, profile picture as well as other information you choose to make public on such 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.

## 8. HOW LONG DO WE KEEP YOUR INFORMATION?

In Short: We keep your information for as long as necessary to fulfil 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). No purpose in this notice will require us keeping your personal information for longer than the period in which users have an account with us.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize 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.

## 9. HOW DO WE KEEP YOUR INFORMATION SAFE?

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

We have implemented appropriate technical and organizational 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 unauthorized 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.

## 10. WHAT ARE YOUR PRIVACY RIGHTS?

In Short: In some regions, such as the European Economic Area, you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time.

In some regions (like the European Economic Area), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information. To make such a request, please use the contact details provided below. We will consider and act upon any request in accordance with applicable data protection laws.

If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. Please note however that this will not affect the lawfulness of the processing before its withdrawal, nor will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

If you are a resident in the European Economic Area and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here: [http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm).

If you are a resident in Switzerland, the contact details for the data protection authorities are available here: <https://www.edoeb.admin.ch/edoeb/en/home.html>.

If you have questions or comments about your privacy rights, you may email us at [hello@kabcompare.com](mailto:hello@kabcompare.com).

#### Account Information

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

- ♣ Contact us using the contact information provided.

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 Terms of Use and/or comply with applicable legal requirements.

Cookies and similar technologies: Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our App. To opt-out of interest-based advertising by advertisers on our App visit <http://www.aboutads.info/choices/>.

Opting out of email marketing: You can unsubscribe from our marketing email list at any time by clicking on the unsubscribe link in the emails that we send or by contacting us using the details provided below. You will then be removed from the marketing email list — however, we may still communicate with you, for example to send you service-related emails that are necessary for the administration and use of your account, to respond to service requests, or for other non-marketing purposes. To otherwise opt-out, you may:

## 11. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

## 12. 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.

## 13. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may email us at [hello@kabcompare.com](mailto:hello@kabcompare.com) or by post to:

SPQT Investments Limited  
Kemp House  
160 City Road  
London EC1V 2NX  
United Kingdom

#### 14. 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 in some circumstances. To request to review, update, or delete your personal information, please submit a request form by clicking [here](#). We will respond to your request within 30 days.

#### Cookie Policy for Kabcompare

This is the Cookie Policy for Kabcompare, accessible from [Kabcompare.com](http://Kabcompare.com)

#### What Are Cookies

As is common practice with almost all professional websites this site uses cookies, which are tiny files that are downloaded to your computer, to improve your experience. This page describes what information they gather, how we use it and why we sometimes need to store these cookies. We will also share how you can prevent these cookies from being stored however this may downgrade or 'break' certain elements of the sites functionality. For more general information on cookies, please read "What Are Cookies".

#### How We Use Cookies

We use cookies for a variety of reasons detailed below. Unfortunately in most cases there are no industry standard options for disabling cookies without completely disabling the functionality and features they add to this site. It is recommended that you leave on all cookies if you are not sure whether you need them or not in case they are used to provide a service that you use.

#### Disabling Cookies

You can prevent the setting of cookies by adjusting the settings on your browser (see your browser Help for how to do this). Be aware that disabling cookies will affect the functionality of this and many other websites that you visit. Disabling cookies will usually result in also disabling certain functionality and features of the this site. Therefore it is recommended that you do not disable cookies.

## The Cookies We Set



- Account related cookies

If you create an account with us then we will use cookies for the management of the signup process and general administration. These cookies will usually be deleted when you log out however in some cases they may remain afterwards to remember your site preferences when logged out.

- Login related cookies

We use cookies when you are logged in so that we can remember this fact. This prevents you from having to log in every single time you visit a new page. These cookies are typically removed or cleared when you log out to ensure that you can only access restricted features and areas when logged in.

### Third Party Cookies

In some special cases we also use cookies provided by trusted third parties. The following section details which third party cookies you might encounter through this site.

- This site uses Google Analytics which is one of the most widespread and trusted analytics solution on the web for helping us to understand how you use the site and ways that we can improve your experience. These cookies may track things such as how long you spend on the site and the pages that you visit so we can continue to produce engaging content.

For more information on Google Analytics cookies, see the official Google Analytics page.

- From time to time we test new features and make subtle changes to the way that the site is delivered. When we are still testing new features these cookies may be used to ensure that you receive a consistent experience whilst on the site whilst ensuring we understand which optimisations our users appreciate the most.

- The Google AdSense service we use to serve advertising uses a DoubleClick cookie to serve more relevant ads across the web and limit the number of times that a given ad is shown to you.

For more information on Google AdSense see the official Google AdSense privacy FAQ.

- We use adverts to offset the costs of running this site and provide funding for further development. The behavioural advertising cookies used by this site are designed to ensure that we provide you with the most relevant adverts where possible by anonymously tracking your interests and presenting similar things that may be of interest.

- We also use social media buttons and/or plugins on this site that allow you to connect with your social network in various ways. For these to work the following social media sites including; {Facebook, Google}, will set cookies through our site which may be used to enhance your profile on their site or contribute to the data they hold for various purposes outlined in their respective privacy policies.

### More Information

Hopefully that has clarified things for you and as was previously mentioned if there is something that you aren't sure whether you need or not it's usually safer to leave cookies enabled in case it does interact with one of the features you use on our site.

However if you are still looking for more information then you can contact us through one of our preferred contact methods:

- Email: [hello@kabcompare.com](mailto:hello@kabcompare.com)