Brixton Pound e-currency (B&e) Privacy Policy

1. Introduction

The following describes the Privacy Policy on which the Brixton Pound Community Interest Company (hereinafter 'B£CIC') offers you access to our services as a Trader or Customer Member of the Brixton Pound e-currency scheme. The Brixton £ CIC is a community interest company limited by guarantee, registered number 7635113. In signing the associated 'Trader Member Agreement' and by using or accessing www.brixtonpound.org, you agree to comply with our privacy practices outlined below.

B£ Community Interest Company is the responsible entity for processing your personal information. If you have questions or comments on our privacy policy as described in the next sections, please contact us via the contact form. Via our contact form you can also report any suspicion or evidence of abuse of personal information.th

• This Privacy Policy is takes effect upon registration for new users and from 29 onward for current users.

September• This Privacy Policy replaces any older versions. The date of last revision is 29 August 2011

B£ CIC has the right to change the privacy policy at any moment in the future. B£ CIC will
inform you on the changes of our privacy policy by sending you a notification to the provided email address and by posting a notification on the website. The new privacy policy comes into
force 30 days after notifying you of the changes.

2. Definitions

- "Us", "we", "our", "Platform" and "[Name of Organisation]" are to be considered synonymous
- 'Personal information', 'Content' and 'Data' are exchangeable

3. Which Personal Information You Provide & Share And To Whom

- Personal information: The personal information that is required upon registration has been limited to first name, last name, e-mail address, mobile number and password. Passwords are encrypted and cannot be viewed by udders, public or adminsistartors. You will also be able to add a picture of yourself and additional personal details about yourself such as gender, address and phone number. Note that some of this personal information might be visible to us, other users of the websites and by non-users (e.g. through a search engine). Users must be 18 years old or greater.
- Device-related information: When you access www.brixtonpound.org from a computer, mobile phone or other device, we may collect information about that device such as your IP-address, your browser type and operating system. This information is only visible to us.

- Transactional Information: we register transactional activities on the sites such as bidding, buying, and offers. This information is visible to us as well as other users and non-users.
 - Financial information: we keep score of your account debits, credits and balance. In addition we may also retain the details of transactions or payments including billing information, credit card or payment source account number. This information is only visible to us.
 - Advertisements: We process information like shop-and product ratings, reviews and advertisements. This information is visible to us, as well as other users and non-users of www.brixtonpound.org.
 - Communications: We process chats, messages and any other correspondence through our sites. These communications are visible to us, users and non-users. We also process correspondence sent to us. This correspondence is only visible to us.
- Hyperlinks and Third Party Applications: www.brixtonpound.org might contain hyperlinks to third party web domains. It is very likely these web domains have a different privacy policy. We do not own or operate the applications or websites that you use through our Platform (such as utilities).

4. How We Collect Your Personal Information

- Through Registration: Upon registration you must provide us with your first name, last name, e-mail address and mobile number.
- Automatically Generated information: We process automatically generated information regarding web user behaviour and device when visiting www.brixtonpound.org
- Cookies: like most other websites we use cookies that are stored locally by your browser. Session cookies are stored in your computer's memory and deleted after closing your browser. Permanent cookies are stored on your local hard disk and are not removed when closing your browser. We use session cookies to make surfing on our website more convenient and permanent cookies to store user settings and preferences. Cookies are harmless for your computer, but if you don't want to make use of cookies, you can disable this function in your web browser.

5. Why You Provide Your Personal Information to Us

We collect and use your personal information for the following objectives:

- To provide to you additional functionalities and specific services
- To optimise your use of www.brixtonpound.org and to personalise/customise your experience based on your preferences
- To collect anonymous statistical data for analysis to better understand your needs and to improve our web-based services
- In order to make our services function correctly and smooth
- To better secure our website against fraud and abuse and to enforce our Terms & Conditions
- To communicate with you on relevant developments and software updates
- To communicate with you in case of troubleshooting or disputes

• To inform you on any changes to our Privacy Policy or Terms & Conditions.

We will never user your personal information for the following purposes:

- For our own commercial purposes like spam and advertisement, without your explicit consent
- · To provide those to third parties for commercial purposes, without your explicit consent

6. How We Share and Disclose Your Personal Information

- Acquisition & Merger: In case of reorganisation, bankruptcy or a part or the whole ownership of B£ CIC is transferred to another organisation, we have the right to transfer your personal information as well. The privacy policy remains intact and in force.
- Fraud, Abuse and Illegal Activities: We honour requests from fiscal and judicial authorities to provide personal information when legally enforced. We can also provide personal information to these authorities on our own initiative when we have a serious suspicion of fraud or abuse as stated in our Terms & Conditions in respect of Abusing the Brixton pound. In addition we might enforce our policies, respond to claims that a listing or other content violates the (property) rights of others, or protect anyone's rights, property, or safety. Such information will be disclosed in accordance with applicable laws and regulations.
- Violations of Intellectual Property Rights: we can decide to pass on personal information to the owners (or his representative) of intellectual property in case we are of opinion that a user violates his rights. This personal information will only be provided under the condition that it is used for judicial procedures.

7. How We Protect Your Personal Information

We are concerned about your personal information and will therefore handle it with great care and we do our utmost best to protect your personal information.

- Storing Personal information: B£ CIC stores personal information no longer than legally permitted and will delete all personal information when it is no longer relevant and necessary to provide the services we described in previous sections. We store personal information on servers inside the European Union.
- Safeguarding personal information: We will take all proper technical and organisational
 measures to protect your personal information against loss or any unauthorised and illegal
 access, processing or distribution. We store your account information on a secure server with
 firewall. Sensitive information (like passwords and PINS) are encoded using SSL (Secure
 Socket Layer) technology that excludes us access to it. Also all transactional data traffic is
 SSL—secured.
- Use of personal information by other users: Users are not allowed to harvest personal information, nor are users allowed to use personal information from other users for spam purposes or any other processing activities without the explicit consent of the concerning individual.
- Measures in case of Fraud and Abuse: We actively take measures to reduce violations of personal information by analysing web activities and suspicious surfing behaviour on www.brixtonpound.org

and detecting malicious software. In case of violations, we reserve the right to take appropriate actions as described in our Terms & Conditions and inform you when this is reasonable.

- Obligation of Secrecy: all our employees have agreed to handle your personal information with great care. Only authorised personnel is allowed to process your personal information. Note that employees will never ask for a password.
- Under aged individuals: Individuals under age 13, are not allowed to register on www.brixtonpound.org or to provide any personal information about themselves. If we learn that we have collected personal information from an individual under age 13, we will delete that information as quickly as possible. To minors 13 years of age or older, we strongly recommend to ask their parents for explicit permission before registering on www.brixtonpound.org.

Ad 1: Your password is the key to your account and corresponding personal information. Use a combination of sufficient unique numbers, letters and special characters. Never disclose your password to anyone, including us. If you do share your password remember that you are responsible for all actions taken in the name of your account. If your password has been compromised for any reason, you should immediately notify us using the contact form and change your password.

Ad 2: Although we are seriously concerned about protecting your personal information, we cannot guarantee that personal information will end up in the hands of third parties or becomes publicly available without your consent. Please be aware that security measures are never perfect. We are not able to detect all events of violations, nor can we enforce them at all times and hence we are not responsible and cannot be held accountable for a security breach and its consequences such as loss or theft of personal information.

8. How You Can View, Control and Remove Personal Information

We will display your Personal Information in your profile page and elsewhere on the Site according to the preferences you set in your account. We urge you to promptly update your personal information if it changes or is inaccurate. We recommend that you guard your sensitive information (including deleting text messages from your phone that contain your PIN), and we encourage users to think carefully about what information about themselves they disclose in their profile pages.

- View: Under your account you are able to view your privacy settings and personal information. It shows you who can see which personal information about yourself.
- Control: Under your account you are able to control who can see your personal information. Also you can delete, add or change personal information displayed. Apart from birth date all other personal information can be controlled.
- Remove: You always have the right to delete your account permanently and entirely. You can make a request for removal of your account using the contact form. Upon deletion any personal information about yourself will be permanently removed.

Ad 1: Once you make a public posting, rating, review or comment, you may not be able to change or remove it.