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# Privacy Policy

We are Ziffer Labs Limited, a company registered with Companies House in England and Wales under number 10372701 whose registered office is at 71-75 Shelton Street, Covent Garden, London, United Kingdom, WC2H 9JQ, operating under the trading name 'Tllid' ("**Tllid**", "**we**", "**us**", "**our**"). We control the ways your data are collected and the purposes for which your data are used by Tllid. Tllid is considered the "data controller" as per the UK Data Protection Act 1998 (as amended or replaced), the General Data Protection Regulation (EU) 2016/679 (the "**GDPR**") and other applicable European data protection legislation (together with the "**Data Protection Legislation**").

Tllid provides a website (the "**Website**"), mobile applications (the "**App**") which enables parents or legal guardians of children ("**Customers**") to arrange nannies or sitters ("**Providers**") to look after those children (the "**Services**").

We are committed to protecting and respecting your privacy. This is of paramount importance to us. By using and interacting with our website and/or the App and the Services, you consent to us processing your data under this Tllid Privacy Policy (the "**Policy**").

This Policy explains:

- what information we may collect about you;
- how we may use the information we collect about you;
- whether we share your information with anyone else;
- the types of cookies we use and how you can reject these cookies;
- your choices regarding the personal information you provide to us;
- where we store your information; and
- how we keep your information secure.

## When does this policy apply

This Policy and our [General Terms and Conditions](#) ("Terms of Use") apply to your use of our Website and/or the App that you may have downloaded a copy of onto your mobile telephone or handheld device ("Device"). The Policy and the Terms of Use also apply to all of the Services we offer, including our website and/or the App services and our Platform Services. For the avoidance of doubt, this policy applies to both Customers and Providers, when using the Tllid website as well as both versions of the Tllid app "Tllid for Parents" and "Tllid for Nannies", as well as our website and other services that we offer.

## Here is the information we may collect about you

### 1. Information you voluntarily provide

- Information that you voluntarily provide on our website and/or the App including when you download the App, register to receive the Services and create a profile. During the registration process, you will be asked to provide us with certain information about yourself and, if you are a

parent, your children. When creating your profile, you may provide us with information directly through the website and/or the App or, with your consent, via one of your social media accounts.

- We may also ask you for information when you report a problem with our website and/or the App or Services.
- If you contact us (by phone, email or through the App), we may keep a record of that correspondence.
- Information you provide when you choose to complete a survey or participate in a competition on the website and/or the App
- If you provide a reference to Tllid for a Provider who is registering on the platform.
- If you use our Platform Services as either a Customer or a Provider.

The information you give includes, but not limited to, your name, address, password, date of birth, number of children, any referral code, photograph/s, credit card details, bank account details, telephone numbers and email address. It may also (with your consent) include details obtained from your social network, your Device contacts list and details of schools/nurseries/other community groups you have a connection with. For Providers, it may include DBS details and Ofsted registration details (if applicable).

Please see Appendix 1 for details of the categories of information that we may collect and process about you.

## **2. Information we collect about you and your Device**

When you visit our website and/or the App and interact with our Services, we (and other third-party service providers) may use a variety of technologies that automatically or passively collect information about how our Services are accessed and used. These are listed on the website and/or Appendix 2.

## **3. User-generated content**

Any content that you create using our website and/or the App (such as reviews, feedback, communication) is stored on servers and some of that content is also cached locally on your device. Such content will be displayed on your profile. See our [Terms of Use](#) for further details. We will process your personal information for the purposes listed in this section given our legitimate interest in providing a safe, secure and transparent market platform for Users.

## **This is what we do with the information we collect about you**

We use the information you provide us with to:

- provide you with relevant information and enable you to use our website and/or the App and Services including enabling payment by Customers to Providers;

- ensure that content from our website and/or the App is presented most effectively for you and for your device to achieve the most user-friendly navigation experience;
- provide you with relevant promotions, offers and discounts from time to time;
- carry out our obligations arising out of the Terms of Use such as enabling us to use the services of third-party information verification providers; and
- notify you about changes to our website and/or the App or Services.

## **Marketing**

We may:

- Send you promotions and offers, advertising, and other information that may be of interest to you based on your preferences and social media advertising through social media platforms.
- Administer referral programs, rewards, surveys, sweepstakes, contests, or other promotional activities or events sponsored or managed by Tllid or its third-party partners.

If your only interaction with the Tllid app or service is to provide a reference for a Provider as part of their onboarding process, then your information will not be used for any marketing purposes.

Otherwise, we will process your personal information for the purposes listed in this section given our legitimate interest in undertaking marketing activities to offer you products or services that may be of your interest. You can opt out of receiving marketing communications from us by following the unsubscribe instructions included in our marketing communications.

Where permissible according to applicable law we may use certain limited personal information about you, such as your email address, to hash it and to share it with social media platforms, such as Facebook or Google, to generate leads, drive traffic to our app or otherwise promote our products and services or the Tllid Platform.

These processing activities are based on our legitimate interest in undertaking marketing activities to offer you products or services that may be of your interest. The social media platforms with which we may share your data are not controlled or supervised by Tllid. Therefore, any questions regarding how your social media platform service provider processes your data should be directed to such a provider.

Please note that you may, at any time, ask Tllid to cease processing your data for these direct marketing purposes by sending an email to [info@tllid.com](mailto:info@tllid.com).

## **Our use of aggregated and anonymised information**

We may provide aggregate user statistics, demographic information and other usage data which does not identify you specifically with some third parties. We may combine your data with those of other users of our website and/or the App and share or provide this information in aggregated and anonymised form with third parties.

We may also use information collected from you and combine it with the information provided by other users of our website and/or the App and Services to help us

improve the design and delivery of our software tools, increasing the effectiveness for all users.

## **This is who we share your information with**

We will only share information with other organisations where we have a lawful basis for doing so.

We may disclose your personal information to any member of our group, which means our subsidiaries, our ultimate holding company and/or its subsidiaries, as defined in section 1159 of the Companies Act 2006.

We may disclose your personal information to third parties:

- if we are under a duty to disclose or share your data to comply with any legal or regulatory obligation or request;
- to enforce or apply our Terms of Use and other agreements or to investigate potential breaches; or
- to protect the rights, property or safety of Tlid or our users.

## **Special categories of data**

In the course of providing services to you, we may collect information that could reveal your racial or ethnic origin, sexual orientation, political opinions, physical or mental health, religious or philosophical beliefs, trade union membership or genetic or biometric data. Such information is considered “special categories of data” under the GDPR and other data protection laws. We only collect this information where you have given your explicit consent or one of the other exemptions apply (e.g., it is necessary to comply with our legal obligations).

## **Retention of data**

Once your relationship with us ends, we will delete your data within 10 working days unless we consider there is a legal reason not to do so.

## **Cookies, pixels, local storage and other similar technologies**

Cookies are small pieces of data that are stored on your computer, mobile phone or other devices. Pixels are small blocks of code on web pages that do things like allow another server to measure viewing of a Web page and often are used in connection with cookies. HTML5 Local Storage is a small database located inside your browser which web pages can use to store data to speed up their processing. We may use all three technologies from time to time, to help improve your user experience.

Cookies do lots of different jobs, like letting you navigate between pages efficiently, storing your preferences, and generally improving your experience of our website and/or the App.

Cookies make the interaction between you and our website and/or the App faster and easier. We use cookies to distinguish you from other users of the website and/or the App and our Services. This helps us to provide you with a good experience when you use the website and/or the App and also allows us to improve the website and/or

the App and Services. Cookies and things like local storage also help us authenticate you to deliver personalised content.

We have outlined below the individual cookies we use and why we use them:

Cookie	Expiry period	Purpose	More information
ga	2 years	Used by Google Analytics to distinguish users	<a href="#">Google Analytics Cookie Usage</a>
_gat	1 minute	Used by Google Analytics to throttle request rate	<a href="#">Google Analytics Cookie Usage</a>

Please refer to your Device's help material to learn what controls you can use to remove or block cookies, or other similar technologies, or block or remove other data stored on your device. **Please remember that if you do this, it may affect your ability to use the website and/or the App and/or the Services.** As you use your Device, you will encounter third parties that make use of cookies and similar technologies. We are not responsible for those third parties or what they may place on your device or in your browser.

## Transferring your information internationally

Tllid may need to transfer your information globally to be able to provide services to you. We want to make sure your information is stored and transferred securely. We will therefore only transfer data outside of the European Economic Area ("EEA") (i.e., the member states of the European Union, together with Norway, Ireland and Liechtenstein) where it is compliant with data protection legislation and the means of transfer provides adequate safeguards with your data, for example:

- By way of the data transfer agreement, incorporating the current standard contractual clauses adopted by the European Commission for the transfer of personal data by controllers in the EEA to controllers and processors in jurisdictions without adequate data protection laws;
- By signing up to the EU-US Privacy Shield Framework for the transfer of personal data from entities in the EU to entities in the USA or any equivalent agreement in respect of other jurisdictions; or
- Transferring your data to a country where there has been a finding of adequacy by the European Commission in respect of that country's levels of data protection via its legislation; or
- Where it is necessary for the conclusion or performance of a contract between you and us or the implementation of pre-contractual measures taken at your request; or
- Where you have consented to the proposed transfer, after having been informed of the possible risks of such transfers.

## Keeping information secure

All information you provide to us is stored on servers owned and operated by Microsoft, using its Microsoft Cloud Services (Azure), and Amazon, using its Amazon Web Services (AWS). More information on these providers is available at <https://www.microsoft.com/en-us/TrustCenter/Security/AzureSecurity> and <https://aws.amazon.com/compliance/data-privacy-faq>.

Payments are processed by Braintree (PayPal (Europe) S.à r.l. et Cie, S.C.A.) (“Braintree”) which uses encryption technology aligned to industry best practice. We store your bank account details to enable payments to be made. We encrypt such details whilst they are stored. When a payment needs to be made, they are decrypted to enable that payment to be made. Card details are only ever stored and seen by Braintree other than some partial card details which we can see within Braintree’s dashboard.

Where we have given you (or where you have chosen) a password that enables you to access the website and/or the App, you are responsible for keeping this password confidential. Please do not share a password with anyone.

Please remember that the transmission of information via the internet is not completely secure. We will do our best to protect your information, but we cannot guarantee the security of your data transmitted to the website and/or the Apps or when you use our Services. Any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## Here are your rights

You have the following rights concerning your information:

- Right to request a copy of your information; this is known as a subject access request
- Right to correct any mistakes in your information held by us
- Right to request we stop processing your information
- Right to request deletion of your information (also known as the “right to be forgotten”)
- Right to request transfer of your data between data controllers

If you would like to request any of the above, please contact us at [info@tllid.com](mailto:info@tllid.com) to make any such requests. We will make our best efforts to meet your request, however, our priority is to comply with the Data Protection Legislation and other applicable laws and regulations.

## Third-party properties accessed from the app

Our website and/or the App and Services may contain links to and from the online properties of advertisers and other third parties. If you follow a link to any of these online properties, please note that these online properties have their privacy policies and that we cannot and do not accept any responsibility or liability for these policies or for any personal data that may be collected through these online properties. Please check these policies carefully before you click on any links and/or submit any personal data to these online properties.

## **Change of control**

If the ownership of our business changes, we may transfer your information to the new owner so they can continue to operate the website and/or the App and provide the Services. The new owner will be obliged to comply with this Policy or notify you of any changes to this policy.

## **Changes to our policy**

Any changes we may make to this Policy in the future will be posted on this page. Where it makes sense because the changes are material, we may notify you of the changes by e-mail or in another appropriate manner such as when you next start the website and/or the App.

## **Contact us**

You can contact us at [info@tllid.com](mailto:info@tllid.com) for any questions, comments or requests you may have regarding this Privacy Policy.



## APPENDIX 1: The Information that we process about you

Type of data	Purpose of Processing	The basis for processing data
Contact details – mobile, full address, email address	ID verification, contacting you, creating your profile on the app, and allowing Customers who have booked you to contact you	Performance of contract
Personal details – name, date of birth	ID verification, background check, creating your profile on the app	
Personal details – number of children, age, names, gender	To build and verify your profile and allow Providers to assess your needs	Performance of contract and Legitimate interest – for Tllid to provide a safe, secure and transparent market platform for Customers and Providers
Social media details – Facebook ID (or other social media ID) + phone contacts	To help connect you with more customers in your social circles.	Performance of contract and Legitimate interest – for Tllid to provide a safe, secure and transparent market platform for Customers and Providers and to help connect you to Customers and Providers in your social circles

Bank details – account number and sort code	To process payments	Performance of contract
Qualifications & Certificates (e.g., DBS & First Aid)	To build and verify the profile and allow Customers to assess skills and suitability	Legitimate interest – for Tllid to provide a safe, secure and transparent market platform for Customers
Psychometric assessment results	To build and verify the profile and allow Customers to assess skills and suitability	
References/Reviews	Customers leave reviews on your profile for other Customers to view before choosing whether to book you. You may also submit references as part of your registration on the Tllid app.	
In-app chat messages	Customers and Providers can communicate with each other via the app's in-app messaging function.	Legitimate interest – Create a record for Tllid's customer service team to ascertain background, a chronology of events etc. to support potential dispute resolution
The type of mobile device you use	To optimise the app for your use and customer service purposes	Legitimate interest – to optimise the app for your use and customer service purposes
A unique device identifier (for example, your mobile device's IMEI number, the MAC address of the mobile device's wireless network interface or the mobile phone number used by the mobile device)		

Mobile network information (Sky Mobile, Vodafone network, EE)		
Your mobile operating system (e.g., iOS, Android)		
Your IP address and HTTP referrer information		
The type of mobile browser you use (e.g., Chrome, Safari, Bing)		
Time zone setting on your mobile device (e.g., GMT)		

*\*some of the information collected relates to Providers only, some to Customers only but most apply to both*

## **APPENDIX 2: Third parties we work with**

We work closely with third parties which provide various, technical, analytical and payment services. The third parties we work with enable us in providing and improving services to the Customers and Providers through advertising, analytics, social network integration, payment service integration and ID verification and we may receive information about you from them. Below is a non-exhaustive list of third parties we work with. We may work with third parties not listed below or stop working with the third parties listed below. We strive to keep this list as updated as possible.

<b>Third-party</b>	<b>How they enable us</b>	<b>The basis for processing data</b>
Facebook, Google, Apple etc.	Allow you to sign in with your email/social media credentials and import your existing connections on our platform	Legitimate interest – for Tllid to provide a safe, secure and transparent market platform for Customers and Providers

TrustID Limited	Process ID verifications for new Customers and Providers	Legitimate interest – for Tllid to provide a safe, secure and transparent market platform for Customers and Providers
TBC	Process DBS checks on behalf of Providers who request the service	Performance of contract and Legitimate interest – for Tllid to ensure the Providers have the necessary clearance to work with children
GoCardless Ltd.	Provide online payment processing services	Performance of contract and Legitimate interest – for Tllid to provide a safe, secure and transparent way to pay for products and services
PsychTests AIM Inc.	Complete psychometric analysis and capture results	Legitimate interest – for Tllid to provide a safe, secure and transparent market platform for Customers and Providers
Any Local Authority in the UK	Check registered nanny credentials	
Twilio UK Limited	Send push notifications within the App	Legitimate interest – to enhance the experience of the Tllid website and/or the App
Google Analytics	Monitor website and/or the App performance and user experience.	
Benchmark Internet Group, LLC	Communicate with Customers and Providers via emails, newsletters etc.	
Any corporate employer in the UK	Provide discounts, offers and complimentary services to their Employees who use Tllid.	

<p>Enable Limited t/a NannyTax and Thakur Chabert Limited</p>	<p>Perform administrative and operational tasks and administer payroll and pension services on behalf of Customers and Providers who request the service</p>	<p>Performance of contract and Legitimate interest – for Tllid to ensure the Customers and Providers are supported with the administrative and operational tasks of managing payroll and pension services</p>
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