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CHATTA

PRIVACY POLICY

Policy brief & purpose

1. We are Care Messenger Holdings Limited (company no. 11233336) whose registered office is at 452 Manchester Road, Stockport SK4 5DL, the owner of the CHATTA brand. We and the CHATTA® brand are interchangeably referred to in the remainder of this privacy policy at “CHATTA”).
2. We designed our company privacy policy to explain how we expect our employees to treat confidential information. Employees will unavoidably receive and handle personal and private information about clients, partners and our companies. We want to make sure that this information is well-protected.
3. We must protect this information for two reasons. It may:
 - a. Be legally binding (e.g. sensitive customer data);
 - b. Constitute the backbone of our business, giving us a competitive advantage (e.g. business processes).
4. At CHATTA, we're committed to protecting and respecting the privacy of those we interact with.
5. This policy explains when and why we collect personal information, how we use it, the conditions under which we may disclose it to others, how we keep it safe and secure and your rights and choices in relation to your information.
6. Any questions regarding this policy and our privacy practices should be sent by email to mark@caremessenger.online or by writing to Data Protection Officer, CHATTA, 452 Manchester Road, Stockport, Cheshire SK4 5DL. Alternatively, you can telephone 0333 444 1240
7. This Privacy Policy sits alongside our Information Security Policy. Please also refer to the appendix to this policy for more specific information relating to consumer data.



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How do we collect information from you?

We obtain information about you in the following ways:

Information you give us directly

For example, we may obtain information about you when you register to receive information from us.

Information you give us indirectly

Your information may be shared with us by third parties, which might include subcontractors acting on our behalf who provide us with technical, payment or delivery services, our business partners, advertising networks analytics providers and search information providers.

You should check any privacy policy provided to you where you give your data to a third party.

When you visit our website – www.chatta.tv

We, like many companies, may automatically collect the following information:

- technical information, including the type of device you're using, the IP address, browser and operating system being used to connect your computer to the internet. This information may be used to improve the services we offer.
- information about your visit to this website, for example we collect information about pages you visit and how you navigate the website, i.e. length of visits to certain pages, products and services you viewed and searched for, referral sources (e.g. how you arrived at our website).

We collect and use your personal information by using cookies on our website – more information on cookies can be found under the 'Use of Cookies' section below.

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Social Media

When you interact with us on social media platforms such as Facebook® and Twitter® we may obtain information about you (for example, when you publicly tag us in an event photo). The information we receive will depend on the privacy preferences you have set on those types of platforms.

What type of information is collected from you?

The personal information we collect, store and use might include:

- your name and contact details (including postal address, email address and telephone number);
- your date of birth;
- information about your activities on our website and about the device used to access it, for instance your IP address and geographical location;
- your bank or credit card details. If you make a purchase, your card information is not held by us, it is collected by our third-party payment processors, who specialise in the secure online capture and processing of credit/debit card transactions; and
- any other personal information shared with us.

Data protection laws recognise certain categories of personal information as sensitive and therefore requiring greater protection, for example information about your health, ethnicity and religion.

We do not usually collect sensitive data about you unless there is a clear and valid reason for doing so and data protection laws allow us to.

Where appropriate, we will make it clear why we are collecting this type of information and what it will be used for.

How and why is your information used?

We may use your information for a number of different purposes, which may include:

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- providing you with the services, products or information you asked for.
- processing orders that you have submitted;
- carrying out our obligations under any contracts entered into between you and us;
- keeping a record of your relationship with us;
- conducting analysis and market research to better understand how we can improve our services, products or information;
- checking for updated contact details against third party sources so we can stay in touch if your details change (see the section on 'Keeping your information up to date' below);
- seeking your views or comments on the services we provide;
- notifying you of changes to our services; and
- sending you communications which you have requested and that may be of interest to you, for example promotions of goods and services.

How long is your information kept for?

We keep your information for no longer than is necessary for the purposes it was collected for. The length of time we retain your personal information for is determined by operational and legal considerations. For example, we are legally required to hold some types of information to fulfil our statutory and regulatory obligations (e.g., health/safety and tax/accounting purposes).

We review our retention periods on a regular basis.

Who has access to your information?

We do not sell or rent your information to third parties.

We do not share your information with third parties for marketing purposes.

However, we may disclose your information to third parties in order to achieve the other purposes set out in this policy. These third parties may include:

Third Parties working on our Behalf

We may pass your information to our third-party service providers, suppliers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf. However, when

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we use these third parties, we disclose only the personal information that is necessary to deliver the services and we have a contract in place that requires them to keep your information secure and prevents them from using it for their own direct marketing purposes. Please be reassured that we will not release your information to third parties unless you have requested us to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

Third Party Product Providers we work with

Our trusted third-party product providers provide a range of quality and reliable products and services designed to meet your needs. When you enquire about or purchase one or more of these products, the relevant third-party product provider will use your details to provide you with information and carry out their obligations arising from any contracts you have entered into with them. They will be acting as a joint controller of your information and therefore we advise you to read their Privacy Policy. These third-party product providers will share your information with us which we will use in accordance with this policy.

We may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganisation, or if we're under a duty to disclose or share your personal data in order to comply with any legal obligation or to enforce or apply our terms of use or to protect the rights, property or safety of our staff, supporters, customers, users of the website or others. However, we will take steps with the aim of ensuring that your privacy rights continue to be protected.

Lawful Processing

Data protection law requires us to rely on one or more lawful grounds to process your personal information. We consider the following grounds to be relevant:



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Specific Consent

Where you have provided specific consent to us using your personal information in a certain way, such as to send you email, text and/or telephone marketing.

Performance of a Contract

Where we are entering into a contract with you or performing our obligations under it, like when you buy our products and services.

Legal Obligation

Where necessary so that we can comply with a legal or regulatory obligation to which we are subject, for example where we are ordered by a court or regulatory authority.

Vital Interests

Where it is necessary to protect life or health, for example in the case of a safeguarding issue which requires us to share your information with the relevant public authorities.

Legitimate Interests

Where it is reasonably necessary to achieve our or others' legitimate interests (as long as what the information is used for is fair and does not duly impact your rights).

We consider our legitimate interests to be running CHATTA as a private company for the benefit of our shareholders and customers. For example to:

- send postal communications which we think will be of interest to you;
- conduct research to better understand our customers and to improve the relevance of our services and products;
- understand how people choose/use our services and products;

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- determine the effectiveness of our services, promotional campaigns and advertising;
- monitor who we deal with to protect CHATTA against fraud, money laundering and other risks;
- enhance, modify, personalise or otherwise improve our services /communications for the benefit of our customers; and
- better understand how people interact with our website.

When we legitimately process your personal information in this way, we consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws. We will not use your personal information where our interests are overridden by the impact on you, for example, where use would be excessively intrusive (unless, for instance, we are otherwise required or permitted to by law).

When we use sensitive personal information, we require an additional legal basis to do so under data protection laws, so will either do so on the basis of your explicit consent or another route available to us at law (for example, if we need to process it for employment, social security or social protection purposes, your vital interests, or, in some cases, if it is in the public interest for us to do so).

Marketing Communications

We may use your contact details to provide you with information about our vital services and products, if we think this may be of interest to you.

Email/text/Phone

We will only send you marketing communications by email, text and telephone if you have explicitly provided your prior consent. You may opt out of our marketing communications at any time by contacting us as per the information at the beginning of this policy.

Post

We may send you marketing communications by post unless you have told us that you would prefer not to hear from us.

Your Choices

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You have a choice about whether or not you wish to receive information from us. If you do not want to receive direct marketing communications from us about the vital products and services you can buy, then you can select your choices by ticking the relevant boxes situated on the form used to collect your information.

We're committed to putting you in control of your data so you're free to change your marketing preferences (including to tell us that you don't want to be contacted for marketing purposes) at any time using: uksales@chatta.tv or by writing to Data Protection Officer, CHATTA, 452 Manchester Road, Stockport, Cheshire SK4 5DL. Alternatively, you can telephone 0191 500 8168.

We will not use your personal information for marketing purposes if you have indicated that you do not wish to be contacted and will retain your details on a suppression list to help ensure that we do not continue to contact you. However, we may still need to contact you for administrative purposes.

Building Profiles

We may analyse your personal information to create a profile of your interests and preferences so that we can tailor and target our communications in a way that is timely and relevant to you. We may make use of additional information about you when it is available from external sources to help us do this effectively. This allows us to be more focused, efficient and cost effective with our resources and also reduces the risk of someone receiving information they may find inappropriate or irrelevant.

We're committed to putting you in control of your data so you're free to opt out of your information being used in this way at any time by contacting uksales@chatta.tv

We may also use your personal information to detect and reduce fraud and credit risk.



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Your Rights

Under UK data protection law, you have certain rights over the personal information that we hold about you. Here is a summary of the rights that we think apply:

Right of access

You have a right to request access to the personal data that we hold about you.

You also have the right to request a copy of the information we hold about you, and we will provide you with this unless legal exceptions apply.

If you want to access your information, please send a description of the information you would like to see and proof of your identity by post to the address provided below.

Right to have your inaccurate Personal Information corrected

You have the right to have inaccurate or incomplete information we hold about you corrected. The accuracy of your information is important to us so if you change email address, or if you believe any of the other information we hold is inaccurate or out of date, please contact us (see above).

Right to restrict Use

You have a right to ask us to restrict the processing of some or all of your personal information if there is a disagreement about its accuracy, or we're not lawfully allowed to use it.

Right of Erasure

You may ask us to delete some or all of your personal information and in certain cases, and subject to certain exceptions; we will do so as far as we are required to. In many cases, we will anonymise that information, rather than delete it.

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Right for your personal information to be portable

If we are processing your personal information (1) based on your consent, or in order to enter into or carry out a contract with you, and (2) the processing is being done by automated means, you may ask us to provide it to you or another service provider in a machine-readable format.

Right to object

You have the right to object to processing where we using your personal information (1) based on legitimate interests, (2) for direct marketing or (3) for statistical/research purposes.

If you want to exercise any of the above rights, please email us at uksales@chatta.tv or by writing to Data Protection Officer, CHATTA, 452 Manchester Road, Stockport, Cheshire SK4 5DL. Alternatively, you can telephone 0191 500 8168. We may be required to ask for further information and/or evidence of identity. We will endeavour to respond fully to all requests within one month of receipt of your request, however if we are unable to do so we will contact you with reasons for the delay.

Please note that exceptions apply to a number of these rights, and not all rights will be applicable in all circumstances. For more details we recommend you consult the guidance published by the UK's [Information Commissioner's Office](#).

Keeping your Information Safe

When you give us personal information, we take steps to ensure that appropriate technical and organisational controls are in place to protect it.

Any sensitive information (such as credit or debit card details) is encrypted and protected with the following software: 128 Bit encryption on SSL. When you are on a secure page, a lock icon will appear on the bottom of web browsers such as Microsoft Internet Explorer.

Non-sensitive details (your email address etc.) are transmitted normally over the internet, and this can never be guaranteed to be 100% secure. As a result,

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while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems. Where we have given (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Keeping your Information up to Date

We take reasonable steps to ensure your information is accurate and up to date.

Where possible we use publicly available sources to identify deceased records or whether you have changed address.

We really appreciate it if you let us know when your contact details change.

Use of 'cookies'

Like many other websites, www.chatta.tv uses cookies. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. This helps us to deliver a more personalised service when you browse our website and improves our services.

It is possible to switch off cookies by setting your browser preferences. For more information on how to switch off cookies on your computer, visit our full cookies policy. Turning cookies off may result in a loss of functionality when using our website.

Links to other websites

Our website may contain links to other websites run by other organisations. This policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other websites even if you access those using links from our website.

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In addition, if you linked to our website from a third-party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the privacy policy of that third party site.

16 or Under

We are concerned to protect the privacy of children aged 16 or under. If you are aged 16 or under, please get your parent/guardian's permission beforehand whenever you provide us with personal information.

Vulnerable circumstances

We are committed to protecting vulnerable people and appreciate that additional care may be needed when we use their personal information. In recognition of this, we observe good practice guidelines in our interactions with vulnerable people.

Transferring your information outside of Europe

As part of the services offered to you through this website, the information which you provide to us may be transferred to countries outside the European Economic Area ("EEA"). By way of example, this may happen if any of our servers are from time to time located in a country outside of the EEA. You should be aware that these countries may not have similar data protection laws to the UK. By submitting your personal data, you're agreeing to this transfer, storing or processing. If we transfer your information outside of the EEA in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this policy.

If you use our services while you are outside the EEA, your information may be transferred outside the EEA in order to provide you with those services.

We undertake regular reviews of who has access to information that we hold to ensure that your info is only accessible by appropriately trained staff and contractors.

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Changes to this policy

Any changes we may make to this policy in the future will be posted on this website so please check this page occasionally to ensure that you're happy with any changes. If we make any significant changes, we'll make this clear on this website.

Review of this Policy

We keep this policy under regular review. This policy was last updated in March 2022.



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Appendix – Consumer Data Policy

This Appendix is to be read together with the Privacy Policy to which it is appended.

Accounts

Account Creation

Your Account can be created either by an organisation on your behalf if they are providing a service to you, or independently if you decide to use either the mobile applications or web applications that form part of the CHATTA service.

Account Activation

Your account is automatically activated at the point of creation and will continue to be activated even if the application is removed from your device.

Account Linking

You receive and send messages using the CHATTA system only to and from Accounts that are linked to yours. You have the capability to link your account to others, and allow others to link their accounts with yours. Organisations may be granted permission to link their Accounts to yours automatically – but they must have a consent agreement with you prior to this taking place.

Account Suspension

Your Account may be suspended if CHATTA believe you are misusing the system – this will only last until an investigation has taken place and a suitable remedy has been carried out, or until it is determined by CHATTA that no misuse has occurred. It may also be suspended if you request it for any purpose and will only be reactivated with your agreement. If your CHATTA service is provided by a third-party organisation, they may request, or suspend your Account themselves if they believe you have breached their terms of use -they must have notified you of this while gaining your consent prior to Account creation, if you have a disagreement with the third party concerning them suspending your Account that must be dealt with by their internal teams. During the suspension period, no messages will be able to be sent or received by the Account. If no suitable remedy or agreement can be reached the Account will be deactivated and subject to the regular deactivation and deletion processes referred to in this Appendix. Accounts which are suspended then deactivated cannot be reactivated without agreement by CHATTA.

Account Deactivation

To Deactivate your Account you must contact CHATTA directly (or the organisation through which you receive the service), or deactivate your own account using the account deactivation functions within the mobile and web applications. Once your Account is deactivated, you will no longer be able to use any of the features of the system, including sending or receiving messages. You can reactivate your account if you wish up until the account deletion period has elapsed. Reactivating your account has the effect of making the system functional again, and also of resetting the account deletion timer.

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Account Expiry

If you have a paid subscription in respect of the CHATTA service, either independently or through a third-party, your Account will automatically expire at the end of the subscription period referred to in your agreement with CHATTA or with that third party, and at this point also becomes deactivated. At any point up until Account Deletion, you can reactivate your Subscription which will also reactivate your Account.

Account Deletion

Once your Account is Deactivated, the Account will be locked for a period of 12 months, at which point the Account will be Deleted, and all information related to the Account becomes irretrievable. At this point the Username assigned to your now deleted Account may be re-issued, but will not contain any of the data associated with your Account. If you wish your Account to be deleted before the Account Expiry timer has elapsed this can be requested. Accounts that are Deleted cannot be restored or recovered.

Messaging

Message Ownership

Messages, images and videos which you receive belong to you. Even if the Account that sent them to you no longer exists you will retain a record of them up until your Account is Deleted or you ask for the data to be removed – whichever is sooner. If you Delete your copy of a message, image or video that is sent to you, the sender retains their copy unless they also delete it. If you delete a message you have sent, the copy held by the receiver will continue to exist until they delete it or their Account is Deleted.

Messages, images and videos which you send belong to you, but a copy is also owned by whoever sent them to. If you ask for the messages to be deleted only your copy will be deleted.

Message Storage

All messages, images and videos sent and received via the CHATTA system are stored on our servers, and only transmitted to devices when they are requested by the CHATTA service applications. You are not limited to the amount of data you can store, but you may be only use this system for data related to the CHATTA service.

Message Deletion

If you ask for content to be Deleted, it is marked as inactive and will not be accessible through the CHATTA applications, but will be retained until the Account Deletion detailed above, or after 12 months have elapsed, at which point it will be permanently deleted and not retrievable.

Message Archiving

If you decide that you no longer wish to use the services, but would like a copy of all messages, images and videos sent to you, a request can be made through the CHATTA web application. Once this request has been processed and we have verified your identity we can provide a download of all content to you.

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Message Content and Sharing

If you are sent messages by an individual, only you and the individual will know the content of the message, but the messages will be counted (see Data Gathering and Metrics below)

If you are sent a message by an organisation, only you and that organisation will know the content of these messages and your responses. These messages will also be counted for statistical purposes to support the system development.

Data Gathering and Metrics

CHATTA Data Usage

CHATTA will monitor statistics related to the use of the system. This will include how many messages are sent, if they are read, how these messages are sent and who has sent them. This data will only be used to support the operation and development of the system, it will not be sold or transferred onto other parties for any purposes related to advertising, promotion, product placement, user profiling or statistical analysis.

If your CHATTA service is provided by a Third Party, they will have an agreement with you which will set out how they use any data they may collect from you using the CHATTA system.

Advertising

CHATTA will not use any data gathered from the system for the purposes of advertising or promotion. CHATTA have an agreement with any third parties that they will not use any data gathered for advertising. Your use of the system is your agreement that you will not use the system to advertise or promote any goods or services without the agreement of the recipients in advance. If CHATTA, or the recipients of messages you send, have a complaint about your use of the system your Account may be suspended while we contact you to determine next steps.

Personal Information

There are only two types of personal data that CHATTA will hold about you, your Name, and the names of people who you can send and receive messages from (Contacts). Third-party organisations who use CHATTA to contact you may hold other Personal Information about you, and this may determine the messages that they send to you, but they must already have a policy that specifies how this data is treated. Third Party organisations who use the CHATTA service, and who you have granted permission will also see your name and the names of those people connected to you through the system.

Sharing Personal Data

CHATTA will not share any data we hold about you without your permission. If you receive your CHATTA service through a third-party organisation, we may gather some of this information from them, but if the data we hold about you is incorrect you will have the opportunity to correct it with us. We will not share this amended information with any organisation or individual without your permission.

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Other Data and Privacy Concerns

If you have any other concerns or questions about how we treat your personal information, or data gathered by your use of the CHATTA system please contact uksales@chatta.tv