



Privacy Policy v1.3
Released 11/08/2017

About Us

THIS PRIVACY POLICY, OUR VIEWER TERMS (hellopupil.com/viewerterms) AND HEALTH & SAFETY GUIDANCE (hellopupil.com/advice) COLLECTIVELY FORM THE "TERMS" GOVERNING YOUR USE OF OUR PLATFORM. PLEASE READ THE TERMS CAREFULLY BEFORE YOU START USING OUR SERVICES. THEY SET OUT WHO WE ARE, HOW WE USE INFORMATION, YOUR OBLIGATIONS TO US AND OURS TO YOU IN CONNECTION WITH THE SERVICES, THE TERMS UNDER WHICH WE CAN WITHDRAW ACCESS TO THE SERVICES, AND HOW TO CONTACT US.

"We, Us, Our" refers to Digital Reality Corp Limited trading as Pupil, registered in England with company number 09696838 and subject to English law. Our address is 42 Berkeley Square, Mayfair, London, W1J 5AW. "You", or "Your" refers to individual consumer users of our Services and/or Platform as described below.

Our website and/or software applications (the "Platform") allows our business customers ("Partners") to promote property, locations, events, destinations or objects ("Content") they are marketing and We make that Content available via online and virtual reality viewing services to You (Our "Services").

This Privacy Policy explains how We process information from which You can be identified directly when you give it to us (for example Your contact details) or indirectly from Your activity on Our Platform and from the Devices You use to access Our Platform (Your "Personal Information"), in connection with Our Services and in line with Our Viewer Terms.

For detailed information, see the "Your Privacy Rights" section below but in summary you have the rights at any time to: request a copy (data portability) of, or access to, your Personal Information, request corrections to, or deletion or restriction of, Your Personal Information, and/or object to Our processing of your Personal information (including profiling activities that we carry out in respect of Your Personal Information). **To make a request to exercise any of these rights email talktous@hellopupil.com.**

We may change this Policy by updating it on Our Website and/or Platform at any time. If We make any changes We will inform You about them using the most recent email address that You provided, if any. If You have not provided Us with Your email address, please check Our Website regularly to take note of any changes and the current version of the policy that applies. If You do not accept any of the changes, You will have the option to stop using Our Services and Our Platform. If You continue to use Our Services and/or Our Platform, We will assume that You are happy with the changes. If We make significant changes, You may not be able to use Our Services and/or the Platform until You have accepted any new terms.

Our Platform may contain links to third party services, websites or applications over which we have no control and for which we accept no responsibility and which will each have their own separate privacy policies and terms of use. You should make yourself aware of any privacy policies they have in place and act accordingly.

1. What information do we collect?

Contact Information

We collect and process Your contact details when you tell Us that You would like to view Content using Our Platform so that We can provide the Services that You have requested and inform the Partner marketing that Content who is viewing it.

Where We request Your contact details, some fields may be mandatory. If You do not want to provide those mandatory details, we may not be able to provide You with Our Services. Please contact us at talktous@hellopupil.com if you have any questions about the information You have been asked to provide.

Platform Activity Information

When You access our Platform We automatically collect information that tells Us about your experience on and interaction with, Our Platform. This includes:

- technical information about the software and device that You use to access Our Platform;
- information about the location from which You access our Platform;
- details of Your activity once You start using Our Platform;, which will involve Us tracking the content You look at, for how long and where You direct your focus/gaze; and
- any reactions, comments or feedback made by You on Our Platform, including recordings of VoIP calls, chats and messages made on Our Platform.

We may apply a unique identifier to Your session on Our Platform and/or associate it with an email address or other personal information You provide to Us, however, it may not always be possible to associate a session ID with the Personal Information You provide directly to Us. For example, if two people share the same device to view content on Our Platform in the same session, We have no way of knowing which user is 'active'.

We may aggregate Your viewing activity and combine it anonymously with other viewings by You and other users and make the resulting composite datasets available to other users, Partners or third parties.

2. What do we do with the information we collect?

Information is stored on secure systems on Our servers and subject to controlled access features and policies. We will take reasonable steps to ensure only authorised personnel have access to Your Personal Information.

Any Personal Information that We process using Our automated systems is hosted initially on servers located within the UK or EU but may be transferred to servers or systems located outside the UK and EU. If we transfer Personal Information outside the UK and EU, we will only do so where the recipients have an adequate level of protection for personal information in line with the relevant data protection laws. No third parties have access to Your information unless We specifically say so in this Privacy Policy, or the law requires this. We will not sell on any Personal Information to third parties without Your explicit consent.

We use information that We collect from You as described below:

Contact Information

Type of data: Your contact information, such as Your name, address, phone number(s) and email address.

Source: Provided by You when You request access to view Content or fill in a contact form to Us or a Partner marketing Content on Our Platform.

How is it used: We use this information to provide Partners with contact information and identities of people viewing Content they have uploaded to our Platform. We also use it to verify Your email or phone numbers are active and to get in touch with You, including where We consider it necessary to inform You of changes to Our policies or terms.

Who is it shared with and why: If You view Content, We will make available to the relevant Partner marketing that Content Your contact information and details about Your viewing (just as You would be asked if You had viewed the property in real life).

Please note that if you elect to contact a Partner using any of the communication features on our Platform, You are initiating a relationship with a third party and we will pass on your contact details in order to facilitate the communication. You should make yourself aware of any privacy policies they have in place and act accordingly.

Device Information

Type of Data: Technical information about Your devices and related software, hardware and peripherals that You use to access the Services, such as make and model of device, other software and hardware details, information about signal quality, configuration information; time and date.

Source: This information is automatically provided by the devices or software You use to access Our Platform when You install Our app(s) and accept the relevant permissions.

How is it used: We use this information to generate statistical analysis and reporting in aggregate on users of Our Platform to help Us ensure that our Platform is compatible with and can operate effectively with user devices and to provide insight to our product development and customer support teams.

Who is it shared with and why: these details are only held on Our systems.

Location and Movement Information

Type of data: GPS location, direction and movement data sent from the devices You use to access Our Platform.

Source: This information is automatically provided by the devices or software You use to access Our Platform when You install apps and accept their permissions.

How is it used: We use this information to generate statistical analysis and reporting in aggregate on users of Our Platform to provide insight and data to our product development and customer support teams, to create marketing materials and products; to locate where You are in the world, to determine travel distance and time saved by viewing Content virtually instead of physically, to determine the direction of gaze and what You focus on when viewing on Our Platform and to provide localised and/or personalised Content to You.

Who is it shared with and why: these details are held on Our systems and made available in personally identifiable form to Partners whose Content you have viewed and in anonymised, aggregate form to other users or advertisers on Our Platform as data insight or reports so that they can compare the performance of Content or take advantage of Our advertising services to promote other Content that may be relevant to You on Our Platform.

Activity Information

Type of data: Actions taken by You on Our Platform e.g. tracking what content You view, for how long, where Your direct Your focus/gaze, actions undertaken, navigation clicks, and time spent in activities.

Source: Activity and event logs recorded automatically by Our Platform.

How is it used: We use this information to generate statistical analysis and reporting in aggregate on users of Our Platform to provide insight and data to our product development and customer support teams, marketing materials and products and to help ensure that Our Platform is compatible and operates effectively with user devices. We also use this information to monitor activities and usage of Our Platform to identify

patterns, resolve issues, conduct research, provide statistical reports and improve Our services e.g. bug monitoring, analysing popular features, determining common behaviours or responses to Content and to provide other Content that may be relevant to You on Our Platform.

Who is it shared with and why: these details are held on Our systems and made available in personally identifiable form to Partners whose Content you have viewed and in anonymised, aggregate form to other users or advertisers on Our Platform as data insight or reports so that they can compare the performance of Content or take advantage of Our advertising services to promote other Content that may be relevant to You on Our Platform.

Content Information Generated by You

Type of data: audio and video, text and imagery

Source: content provided by You e.g. when leaving reviews or comments, Voice Over IP calls, video chats messaging and/or other features enabling You to provide feedback on Content.

How is it used: We use this information to allow You to leave comments and reviews on content for other users, to provide instant messaging, video calls or audio calls over Our platform between users, to record audio and communications for analysis, training, security, safety of other users and quality purposes. Some of the services on Our Platform may include the ability to speak and hear other participants using VoIP or similar technologies. We may record these calls, analyse the content, make them available to other participants and combine this information with other data about Your activity on Our Platform.

Who is it shared with and why: Information you provide during communication activities will be passed to other participants in the relevant communication. Information you post in public areas of the site will be available to all users of the Platform. Information you provide in viewings may be made available to the Partner marketing that Content and they may choose to share that in turn with connected third parties e.g. the owner of a property you view.

We may also share any of the contact information or the platform activity information set out above to Our service providers acting on Our behalf, to third party law enforcement agencies, where this is permitted or required by law and/or to anyone else where required to do so by a court ruling or order.

3. Legal Basis for Processing

We only process Your Personal Information where this is:

- necessary in order to provide You with Services, Content and access to Our Platform in accordance with Our Terms;
- necessary for compliance with any legal obligation which applies to Us;
- necessary for Our legitimate interests in:
 - connection with providing Our Services, Content and/or access to Our Platform (for example in Our collection of information about Your location and Your activity on Our Platform as described above);
 - ensuring network and information security;
 - providing direct marketing (although We will not process Your Personal Information for electronic marketing purposes without Your consent, unless this concerns products/services similar to the Services);
 - creating profiles so that We can provide You with content that may be of interest to You;
 - sharing information with Our service providers and law enforcement agencies (where it is appropriate to do so),

as long as, in each case, these interests are in line with applicable law and Your legal rights and freedoms.

4. Cookies

We use cookies on Our website. You can find out about the cookies We use and why by viewing Our Cookie Policy here: <http://hellopupil.com/cookies>. Our Cookie Policy should be read together with this Privacy Policy and the other Terms.

5. Analytics

We use Google Analytics to help Us monitor the traffic on our platforms and carry out statistical analysis of pages and paths through the site. We employ the IP anonymisation feature of Google Analytics which strips critical information from your IP so we cannot identify you.

For more information on how Google uses the data collected via this service, see here: <http://www.google.com/policies/privacy/partners/> and Our Cookie Policy.

To opt out of being tracked via Google Analytics, you can also use Google's opt-out browser add-on: <https://tools.google.com/dlpage/gaoptout>

6. Profiling

We use automated systems to analyse any information We collect about You or which You provide to Us to develop profiles of Your preferences and activity on Our Platform to help Us show You Content We think You would be interested in. We may also use profiles to display relevant content from third parties to You (without making Your Personal Information available to them).

7. You may object to this type of processing. Please see Section 9. below for further information on Your rights. Marketing

We will (provided that You consent to this – unless we are providing products or services that are similar to the Services You have already requested) use Your email address to keep You informed of product news and features about Us as well as letting You know about new content We think would be relevant.

We do not sell or pass Your email or other contact details on to third party advertisers without your explicit consent.

You can opt out of marketing emails from Us at any time using the ‘unsubscribe’ links We will include on them or emailing talktous@hellopupil.com with the subject “UNSUBSCRIBE”. You may also object to this type of processing. Please see Section 9. below for further information on Your rights.

8. Information Retention

Our policy is to keep Your Personal Information for as long as required for the purposes described in this Privacy Policy, or until You notify Us that You wish to have it deleted (if this happens before). If You do, We will keep activity and profile information from sessions associated with your Personal Information for the purposes of product development, reporting and analysis but remove any link to Your Personal Information so that the data is anonymised and can't be reattributed to You.

9. Your Privacy Rights

This section explains Your rights regarding Your Personal Information. The various rights are not absolute and each is subject to certain exceptions or qualifications.

Further information and advice about Your rights can be obtained from the Information Commissioner's Office (ICO): <https://ico.org.uk>.

We usually act on requests and provide information free of charge, but may charge a reasonable fee to cover Our administrative costs of providing the information for:

- baseless or excessive/repeated requests, or
- further copies of the same information.

Alternatively, We may be entitled to refuse to act on the request.

Please consider Your request responsibly before submitting it. We'll respond as soon as We can. Generally this will be within one month from when We receive Your request but, if the request is going to take longer to deal with, We'll come back to You and let You know.

To make any request under Your privacy rights, please email talktous@hellopupil.com with Your enquiry or request.

Accessing Your information

When can You request access?

You've the right to:

- confirmation that Your information is being processed
- access to Your information, and
- certain other information (most of which should be in Our privacy policy anyway)

You can request copies of paper and electric records about You that We hold, share or use. To deal with Your request, We can request proof of identity and enough information to enable Us to locate the information You request.

When will access not be provided?

We can only provide You with Your information, not information about another person. Also, where access would adversely affect another person's rights, We're not required to provide this. Subject access requests are also not a substitute for disclosure processes in litigation.

Please clearly set out in Your access request the information that You're requesting. If this is not clear, We may come back to You to ask for further information by way of clarification.

Correcting Your information

You've the right to obtain from Us without undue delay the rectification of inaccurate Personal Information concerning You.

You may also have the right to have incomplete Personal Information completed, including by means of providing a supplementary statement. Whether or not this is appropriate in any particular case depending on the purposes for which Your information is being processed.

We need to notify any third parties with whom We've shared Your information that You've made a rectification request (see "What do We do with it?") We'll take reasonable steps to do this, but this may not always be possible or may involve disproportionate effort.

Erasing Your information

When can You request erasure?

You've a right to have Your information erased and to prevent processing, where:

- the information is no longer necessary for the purpose it was originally collected/processed
- You withdraw consent (where previously provided)
- You object to the processing and Our legitimate interests in being able to keep processing Your information don't take priority
- We've been processing Your information in breach of data protection laws
- the information has to be erased in order to comply with a legal obligation
- the information is processed in relation to offering information society services (i.e. social networking sites and internet forums) to a child.

When can We refuse erasure requests?

The right to erasure does not apply where Your information is processed:

- to exercise the right of freedom of expression and information
- to comply with a legal obligation for the performance of a public interest task or exercise of official authority
- for public health purposes in the public interest
- for archiving purposes in the public interest, scientific research historical research or statistical purposes
- for the exercise or defence of legal claims.

The right to erasure does not therefore provide an absolute 'right to be forgotten'.

Do We have to tell other recipients of Your information about Your erasure request?

Where We've disclosed the information You want to be erased to third parties (see "What do We do with it?"), We need to inform them about Your erasure request, so they can erase links to, copies or replication of, the information in question. We'll take reasonable steps to do this, but this may not always be possible or may involve disproportionate effort.

It may also be that the recipient is not required to erase Your information because one of the exemptions above applies – see "When can We refuse erasure requests?"

Restricting processing of Your information

When is restriction available?

You've the right to restrict the processing of Your information in the following circumstances:

- where You contest the accuracy of the information, We need to restrict the processing until We've verified the accuracy of the information
- when processing is unlawful and You oppose erasure and request restriction instead
- if We no longer need the information but You need this to establish, exercise or defend a legal claim
- where You've objected to the processing in the circumstances detailed in paragraph (a) of "Objecting to processing", and We're considering whether those interests should take priority

Do We have to tell other recipients of Your information about the restriction?

Where We've disclosed Your relevant information to third parties, We need to inform them about the restriction on the processing of Your information, so that they don't continue to process this.

We'll take reasonable steps to do this, but this may not always be possible or may involve disproportionate effort.

We'll also let You know if We decide to lift a restriction on processing.

Taking Your information with You

When does the right to data portability apply?

The right to data portability only applies:

- to information You've provided to Us (i.e. not any other information We have derived or calculated)
- where the processing is based on Your consent or for the performance of a contract,
- when processing is carried out by automated means.

This right only applies to any Content You have actively provided or contributed to Our Platform.

When can We refuse requests for data portability?

We can refuse Your data portability request if the processing does not satisfy the above criteria. Also, if the information concerns more than one individual, We may not be able to transfer this to You if to do so would prejudice that person's rights.

Objecting to processing

You can object to processing in the following circumstances:

(a) Legitimate interests/public interest/exercise of official authority

You've the right to object, on grounds relating to Your particular situation, at any time to processing of Personal Information concerning You which is based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling based on these).

If We can show compelling legitimate grounds for processing Your information which override Your interests, rights and freedoms, or We need Your information to establish, exercise or defend legal claims, We can continue to process it. Otherwise, We must stop using the relevant information.

(b) Direct marketing

You also can object at any time to Your information being used for direct marketing purposes (including profiling based on personal information related to such direct marketing).

Where You object to processing for direct marketing purposes, the Personal Information shall no longer be processed for such purposes.

(c) Scientific/historical research and statistics

Where We use Your information for scientific or historical research purposes or statistical purposes, You can, on grounds relating to Your particular situation, object to processing of Personal Information concerning You. If the processing is necessary for the performance of a task carried out for reasons of public interest, We can continue with this. Otherwise, We must stop using the relevant information.

If Your objection is accepted, You can request for processing of Your relevant information to be restricted or for this to be erased.

Automated Decision Making ("ADM") and profiling

You've the right not to be subject to a decision based solely on automated processing (ADM), including profiling, which has legal consequences for You or similarly significant effects.

While We're confident that the technology works, We understand that not everyone is comfortable with processes being left entirely up to algorithms. That is why You can request human intervention and let Us know Your concerns if You think Our algorithms have got it wrong.

10. Making a complaint

If You are unhappy with how We've handled Your information, write to Us here: 42 Berkeley Square, Mayfair, London, W1J 5AW or email talktous@hellopupil.com.

If You're not satisfied with Our response to Your complaint or believe Our processing of Your information does not comply with data protection law, You can make a complaint to the Information Commissioner's Office <https://ico.org.uk>.