

# **LUXB PRIVACY POLICY**

## **VERSION 1.0.0 - Effective August 15, 2022**

When you use the LuxB app, you give us access to information about you. In this document we will elaborate on what data we collect about you, why we collect it, how it is used, and on what legal basis the collection is made.

The prime purpose of collecting your data is to deliver and improve your experience on LuxB. Whether we're enabling you to chat with sellers and buyers, or collaborating with payment and shipping vendors to enable direct payments or shipping solutions through our services, our aim is for you to shop as effortlessly as possible.

The data is further used to reduce misuse of the Service, analyse and understand market trends and to offer relevant advertising adjusted to your interest and usage patterns.

In this privacy policy we will cover:

- The types of personal data we collect
- How we use personal data
- How your information is shared with others
- Information about children
- The legal bases for processing personal data
- Storage and information security
- Data Retention
- Your rights and choices
- Data Protection Officer
- Who we are and how to contact us

## **The types of personal data we collect**

When you use our Services, we collect the following types of information:

### **Information you provide to us**

#### **Account information**

Some information is required to create an account on our Services. Depending on the sign-up method of your choice this can be your name, email address,

username, phone number and connection to Facebook or Apple. This is the only information you have to provide to create an account with us.

### **Information from Third-party services**

When you sign up as a user by linking your Facebook account or Apple ID you share a reference to the chosen provider. Depending on the method selected you may also share your name, email address, profile picture, language and friend list. You can stop sharing the information from the third-party service by removing our access to that service at any time.

You can also give us access to personal data when you create or add information to your listings, in the messages you send with Customer Support or other users, or in reviews you give us or other users.

When you order a LuxB app subscription we may order your credit score from a third-party, and base our decision of allowing you a credit line on this result. Your credit score will not be stored in our systems.

### **Card and bank information**

Some features on LuxB enable transactions between you and us or you and other LuxB users. If you activate these features you must provide certain information for identification and verification, such as your name, address, date of birth, card number, bank account IBAN number, card expiration date, and CVV code.

This information is stored with a third-party, Stripe, which handles payments for LuxB. The information is encrypted and sent to the card network, which if approved returns a token which is a random string of characters that is used for engaging in transactions without exposing your card information.

LuxB does not store this information on our servers, we only store references to the information stored with Stripe. You can remove the tokens from your account from the account settings or by deleting your account. Note that third-party payment processors may retain this information in accordance with their own privacy policies and terms, or as required by law. Stripe's full privacy policy and terms are available [here](#).

### **Additional information**

To help improve your experience or enable certain features of the Services you may choose to provide us with additional information such as your phone number, address, date of birth, banking information or other information you provide to our Customer Support if you require assistance.

You may also connect with friends on the Services or invite friends who have not yet joined by providing their email addresses or by accessing social media accounts.

If you participate in a survey, contest or promotion we store the information you submit, which may include your name, contact information and message.

### **Information we collect automatically**

When you visit luxbapp.com (or other pages we use) or use our apps we use different technologies to provide you with the best possible experience and functionality.

### **What technology you use**

We automatically collect information about what technology you use - i.e. your device, your browser, IP address, network operator and so forth. The data collected varies depending on the device you use.

### **How you use our Services**

We use different internal and third party tools to measure how you interact with our Services. For instance what items you click on, what items you like, who you follow, how often and the last time you used our Services, and if and where the application crashes for you and what advertising we have shown you.

### **Location information**

We automatically register information about where you are when you accept location access in our apps or by using the location you select. We may also derive your approximate location from your IP address.

### **How we use personal data**

We use the data we collect to provide you with the Products and Services we offer and to honor our [Terms of Service](#) agreement with you. This includes

using data to improve and personalize your experiences. We also use data to communicate with you, for example to inform you about your account, new products or services, updates to these terms and other types of updates.

LuxB uses personal data for the following purposes:

### **Providing our product to you**

We use personal data to deliver the product you expect from us. For instance we need your name to show your profile and your email to get in touch with you to communicate important events, such if a payout fails.

### **Product improvement**

We continuously use data for research purposes and to develop and improve our offerings. We analyse statistics collected from large user segments to understand how people use LuxB and how we can improve further. This includes using error reports to improve security and features of the clients, using search queries and clicks to improve the relevance of search results and using usage data to determine what new features to prioritise.

These third parties include:

- Google Analytics - User insight
- Firebase (A Google product) - Crash and performance data

We use Google Analytics and Google Analytics Advertising features to understand how our user audience breaks down by Age, Gender, and Interests. This information is fully anonymous, but if you not accept to share this information you can opt-out by using the [Google Analytics Opt-out Browser Add-on](#) or refrain from using the service.

### **Adapt LuxB to you and your interests**

We try to make LuxB as interesting and relevant for you as possible. For instance, we can show you collections of listings that we believe are relevant for you based on your location and profile. We can also show listings that are similar to those you have liked or searched for previously, and get recommendations based on what other users similar to you have liked.

### **Communicate with you**

We use the data we collect to deliver and personalize our communications with you. For example, we may contact you by email or other means of electronic communication (e.g. SMS, push notifications or email), including through the LuxB app to inform you about new LuxB Products or Services, update you on a support issue, security or software updates, or invite you to take part in a survey.

We use data to respond to customer enquiries, diagnose technical issues and provide customer care and support services.

We want to show content and advertising that is as relevant as possible for you, and we measure how well we do. Therefore we use information about you collected from our Services to show you LuxB content and advertisements from our partners. You can be shown LuxB content adapted to you also outside of the LuxB apps and websites.

We do not share information that can identify you without your explicit consent.

This processing is necessary for the performance of the agreement we have with you and our legitimate interest. You can opt-out of receiving direct marketing communications from LuxB by following the instructions sent in every such email or access it from the Privacy settings and/or notification settings accessible in the LuxB application. We will not send you promotional emails once you unsubscribe, but please note that you cannot opt-out of communications related to changes in terms of service and policies, security updates or other important information related to your LuxB account.

### **Build a safe and efficient marketplace**

We believe it is important to know who you are about to trade with and show some of your personal information on your LuxB profile and listing. This includes your name, profile picture and address. You can select the granularity of your address when you browse and add items for sale.

It is important to us to keep LuxB a safe place to buy and sell second hand treasures. We do everything we can to avoid unwanted or criminal activity on the marketplace, with both visible and hidden measures. In order to facilitate this we store and utilize some information, including IP-addresses, email-addresses, message history and other personal data collected. This processing is necessary for the performance of the agreement we have with you.

We use cookies or similar technologies for the purposes described above. Please read our [Cookie Policy](#) for more information about cookies.

## **How your information is shared with others**

We do not share your personal information except in the limited circumstances described below. However, we may share non-personal information that is aggregated or de-identified so that it cannot reasonably be used to identify an individual. We may disclose such information publicly, to third-parties and to partners, for example in public reports about second hand and as part of community benchmarking.

### **For external processing**

LuxB uses third-party vendors to perform some or parts of our Services. This includes credit card and bank account processing, online product purchasing and shipping. We only share your personal data as necessary to fulfil our agreement with you as described in this Privacy policy and our [Terms of Use](#).

If you have questions about the external processing we do, please reach out to us at [support@luxbapp.com](mailto:support@luxbapp.com).

### **For legal reasons or to prevent harm**

If we are requested to share your personal information to a governmental agency, such as the local police, this information will be shared by subject of a legal request. In those cases the exact information that is shared is specified in the legal request, and will include: Your name and address, IP address(es), chat history, location information. You will not be notified if such sharing occurs.

In case of a dispute, relevant information - such as information about one or more listings and message history - may be shared with the counterparty in the dispute or others.

### **Sale or merger**

We may share your personal information in the event of a merger, acquisition, or sale of all or a portion of our assets. We shall notify you via email and/or a prominent notice on our website and inform you of your rights.

Please note, our Products include links to Products or applications of third parties whose privacy practices may differ from ours. If you provide personal data to any of those third parties or their products, your data is governed by their privacy statements, and we encourage you to read these privacy statements carefully.

## **Information about children**

LuxB does not target and is not intending to attract children under the age of 18. Although visitors of all ages may navigate through our websites or use our app, we do not wish to collect or request personal data from those under the age of 18. If, following a notification from a parent, guardian or discovery by other means, a child under 18 has been improperly registered, we will cancel the child's account and delete the child's personal data from our records.

## **The legal bases for processing personal data**

There are different legal bases that we rely on to use your personal information, namely:

### **Performance of a contract**

The use of your personal information may be necessary to utilize the services provided by the LuxB app.

### **Legitimate interest**

We may use your personal information for our legitimate interests. For example, we rely on our legitimate interest to analyse and improve our products and services. Where we process your personal information based on our legitimate interest and no opt-out mechanism is available to you (e.g. in the LuxB Privacy settings), you may exercise your right to object by sending an email to [support@luxbapp.com](mailto:support@luxbapp.com) or by withstanding from using our services.

### **Legal obligation**

The processing is necessary for compliance with a legal obligation to which we are subject. For instance we are required to collect some personal data before we can initiate payouts to be compliant with money laundry regulations.

## **Storage and information security**

We work hard to keep your information safe, and use a combination of technical, administrative and physical controls to maintain the security of your data. This includes using Transport Layer Security (“TLS”) to encrypt most of our services.

Personal data collected by LuxB is stored and processed in the EU and Norway. Some third parties (specifically Stripe for payments) may process your information in the United States.

## **Data Retention**

LuxB will retain your personal information for as long as you maintain a customer relationship with us and as long as needed to comply with applicable laws, resolve disputes with any parties and otherwise as necessary to allow us to conduct our business. We do this as it is required for us to be able to deliver our services to you. All personal information we retain will be subject to this Privacy policy and our internal retention guidelines, and we retain your data based on the following:

- IP addresses are stored for 21 days
- Personal data related to usage (traffic information) will be anonymised/deleted after six months
- Information about calls in Norway will be deleted after three months
- Inactive and/or closed accounts are deleted after 12 months

## **Deleting personal information**

As long as your account is active we will store your personal information, listings, message history, likes and other information that you register. You can choose to delete your LuxB user account at any time. In that case your user profile will no longer be accessible on our service as an immediate action. We will keep your information for up to 120 days as this information may be required by government agencies or for resolving disputes.

Similarly, listings are kept for up to 120 days when you delete them, but they will not be accessible by others. The account and associated information may also be washed for personal data and be used for analytical purposes.

Please note that messages sent to other users will still be available for those users, even after your account has been deleted.



If an account has been involved in fraud we may store personal information about that account permanently in order to prevent accessing our Services at a later time. This processing is based on our legitimate interest.

## Your rights and choices

### Your Rights

We want you to be in control of how your personal information is used by us. You can exercise these rights in the following ways:

- You can ask us for a copy of the personal information we hold about you
- You can inform us of any changes to your personal information, or if you want us to correct any of the personal information we hold about you
- You can ask us to erase the personal information we hold about you
- You can ask us to send the personal information you have given us to a third party

Where we are using your personal data on the bases of your consent you are entitled to withdraw that consent at any time. Where we use process your personal information on the bases of our legitimate interest you have the right to object at any time to that use of your personal information.

We always aim to obtain a fair resolution of any complaint or concern you might have about our use of personal information. However, if you do not believe that we have been able to assist you with your complaint or concern you have the right to file a complaint with the Data Protection Authority in your country. In Norway this is [Datatilsynet](#).

### Your choices

If you want to access or edit profile information you can do this from the settings page in the LuxB application. If you want to change your phone number, please contact us at [support@luxbapp.com](mailto:support@luxbapp.com) for assistance. If you wish to close your account, please contact us at [support@luxbapp.com](mailto:support@luxbapp.com) for assistance.

You can view and edit your consents from within the Privacy center, accessible from the settings menu in the LuxB application. If you cannot access these settings you can contact us at [support@luxbapp.com](mailto:support@luxbapp.com). We will answer any request to access or delete your personal data as soon as possible and within 30 days.

# Who we are and how to contact us

If you need to get in touch with us for suggestions, questions, or concerns about this policy or about our use of your information, please contact us at [support@luxbapp.com](mailto:support@luxbapp.com).

You may also contact us at:

**LuxB** (*Guimaraes Cardoso Stylist - organisation number: 829 476 282 MVA*) is a Norwegian company and is the data processor responsible for the personal data collected through interactions with our services.