



Privacy Notice

This webpage sets out when and how we use your Personal Data that you or others provide to us. Your privacy is of the utmost importance to us. We want to make sure you fully understand the terms and conditions surrounding the capture and use of that information, whether we receive it directly from you, a third party or via the Snapfetti mobile application (“**App**”) or the Snapfetti website (“**Website**”). This Privacy Notice describes what information we collect about you, how we use it, and the rights you have in relation to that collection and usage.

If you have any questions about this Privacy Notice, please contact us at hello@snapfetti.com.

WHO WE ARE

We are **SNAPFETTI LIMITED**, a private limited company incorporated and registered in England and Wales with the company number 15336776 whose registered office is at 11a Wroxham Road, Norwich, Norfolk, United Kingdom, NR7 8TN (“**Snapfetti**”).

For the purposes of the Data Protection Act 2018, the UK General Data Protection Regulation and any other applicable data protection and privacy laws and regulations (“**Data Protection Legislation**”), Snapfetti will be the ‘data controller’ for all Personal Data we determine the means and purpose of processing.

By “**Personal Data**” we refer to information collected or held by Snapfetti, that identifies and relates to you as an individual.

INFORMATION WE COLLECT AND USE AT SNAPFETTI

We gather and use Personal Data in the following circumstances.

When you register an account with us on the App:

As a user of Snapfetti, we gather your Personal Data in the following circumstances:

By registering your account on our App and using the App functions we will collect the following Personal Data:

Standard Users:

Data Type	Mandatory / Optional	Reason for Collection
Full name	Mandatory	Required to identify the user creating the account.
Email address	Mandatory	Required to contact and verify the user. It may also be used for marketing and account recovery purposes.
Profile picture and other images*	Optional	The user can upload images to be shown in the App.

*PLEASE NOTE: you must not submit any images of third parties unless you have permission of the relevant person(s) featured in each image.

Event Hosts:

Data Type	Mandatory / Optional	Reason for Collection
Event Hosts’ full name	Mandatory	Required to identify the user creating the account.
Event Hosts’ phone number	Optional	Required to uniquely identify and verify the user.
Marital Status	Mandatory	The App will relate to your wedding day, so we will process information about your marital status and who you are getting married to.
Date of Birth	Optional	Marketing communications related to date of birth (where opted-in)
Event date and venue address	Mandatory	Required for setting up the Event within the App.
Email address	Optional	Required to contact and verify the user. It may be used for marketing and account recovery purposes.
Profile picture	Optional	The user can upload an image to be shown on the in-app map.

When using the App, we collect the following Personal Data on your phone / device:

Data Type	Mandatory / Optional	Reason for Collection
Time and date of your App usage	Mandatory	The Snapfetti app automatically collects this information for diagnostic and analytical purposes.
Data and statistics on App usage	Mandatory	The Snapfetti app automatically collects this information for diagnostic and analytical purposes.
Client-side errors	Mandatory	The Snapfetti app automatically collects this information for

		diagnostic and analytical purposes.
Internet protocol (IP) address	Mandatory	The Snapfetti app automatically collects this information for diagnostic and analytical purposes.

Where we do not require this information as a necessity of providing our service, we collect and use this information under our legitimate interest to provide a secure and consistent product by ensuring we can identify and correct any errors that may occur by incorrect data being passed to us.

If you contact our helpdesk service as a user, we will collect your name, contact details, nature of your request and any supplementary information you choose to provide us. We will only retain the Personal Data pertinent to resolving your issue.

When you have expressed an interest in our services:

If you have opted in via our Website or other form of media to receive marketing communications from us, we will handle your Personal Data for example (your name, email address and telephone number) to provide you with marketing communications in line with any preferences you have told us about.

You are not under any obligation to provide us with your Personal Data for marketing purposes.

When we send marketing emails to our clients and service users, we rely on consent to contact you for marketing purposes. If we consider that you may genuinely have an interest in benefitting from our service, we may make business to business approaches under our legitimate interests. Every email we send to you for marketing purposes will also contain instructions on how to unsubscribe from receiving them. You always reserve the right to object to our processing under legitimate interests, please see the “*Your rights under Data Protection Legislation*” section below.

When we send you marketing material in the post, we rely on our legitimate interest to let you know about our latest offers and services.

You can tell us that you do not want your Personal Data to be processed in this way at any time by contacting us at hello@snapfetti.com or, where relevant, by following the unsubscribe link shown in every marketing communication you receive from us.

When you purchase items through our App:

In order to process an order for products in our App (e.g. printed photographs), we will require your:

- a) name;
- b) e-mail address;
- c) billing address;
- d) phone number;
- e) delivery address; and
- f) your payment details.

To ensure that your credit, debit or charge card is not being used without your consent, we may validate name, address and other personal information supplied by you during the Order process against appropriate third party databases.

There is a possibility we may contact you to make additional security checks and we ask for your co-operation to enable us to complete them. We will not tolerate fraudulent transactions and such transactions will be reported to the relevant authorities.

In performing these checks personal information provided by you may be disclosed to a registered Credit Reference Agency which may keep a record of that information. You can rest assured that this is done only to confirm your identity, that a credit check is not performed and that your credit rating will be unaffected.

When you visit the Website:

We use Google Analytics to collect standard internet log information (please see the “*Cookies*” section below) and details of visitor’s behaviour patterns. We do this to help identify the number of visitors to the site and the pages they visit. We do not record, and we do not allow Google to make any attempt to identify the individual identities of those who visit our pages.

This information is stored and used for aggregated and statistical reporting. The collected information is used to provide an overview of how people are accessing and using the Website. Any Personal Data gathered from first-party essential cookies on our Website is processed under our legitimate interest to promote the success of the business and ensure the security of the Website or to perform a contract with you.

You can prevent us from using your Personal Data in this way by using the ‘do not track’ functionality in your internet browser or withholding your consent for the installation of non-essential cookies on your computer. If you enable do not track functionality, our site may be less tailored to your needs and preferences.

What we don’t collect:

Card payment details taken for our services are processed and managed via a third party payment provider. Snapfetti does not

hold any card detail information as part of the Personal Data we handle on your behalf.

IF YOU FAIL TO PROVIDE US WITH PERSONAL DATA

You always reserve the right to withhold your Personal Data, but this may affect how we provide our services.

Where we need to collect Personal Data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

LAWFUL BASIS OF PROCESSING

We will only process your information for as long as we have a relevant legal basis to do so. This is usually in order to provide you with the goods and/or services that you have requested from Snapfetti and unless stated, all of the above processing is conducted under the legal basis of performance of a contract.

If we have collected sensitive personal data as part of our service provision, we will always ensure that we either request explicit consent from you or document the appropriate exemption to allow the processing of this data.

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we consider the new purpose to be incompatible with the original purpose of collection, we will conduct a privacy impact assessment or contact you to request your consent for further processing. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at hello@snapfetti.com.

STORING YOUR DATA

The data that we collect from you will primarily be stored in a location within the United Kingdom and the European Economic Area (EEA). In the event that we need to transfer your Personal Data outside of the United Kingdom and/or the EEA, we will ensure that there is an appropriate legal transfer mechanism in place.

All information you provide to us is stored on our secure servers or those of our third party sub-contractors. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our App, you are responsible for keeping this password confidential. You must not share your password with anyone.

SHARING YOUR INFORMATION WITH OTHERS

If and when we share your data, we always do so under a written agreement governing how your data must be protected.

We may be required to share your Personal Data with third parties to adequately provide our services. Please be assured that we will not share your information for any other reason unless we are required by law or permitted to do so under this Privacy Notice. The main circumstances in which we will be permitted or required to disclose this is by law will be by court order, to government bodies and law enforcement agencies.

However, sometimes we may share your information with third parties in the following ways:

- a) we may share standard user's information with your nominated Event Hosts where it is appropriate to do so as part of our services;
- b) we may use carefully selected sub-processors (which may include, without limitation, our software support provider, TX (PRIVATE) LIMITED) to help us collect, store or manage your information. This will always be managed under the terms of a written data processing agreement;
- c) analytics and search engine providers that assist us in the improvement and optimisation of the Website; and
- d) we will transfer your Personal Data to a third party if:
 - i. we sell or buy any business or assets, we will provide your Personal Data to the seller or buyer (but only to the extent we need to, and always in accordance with Data Protection Legislation); or
 - ii. if Snapfetti or the majority of its assets are acquired by somebody else, in which case the Personal Data held by Snapfetti will be transferred to the buyer.

We process your Personal Data for this purpose because we have a legitimate interest to ensure our business can be continued by the buyer. If you object to our use of your Personal Data in this way, the relevant seller or buyer of our business may not be able to provide services to you.

RETAINING DATA

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements.

PROTECTING YOUR DATA

We take our security obligations very seriously and constantly monitor for breaches and potential weaknesses.

Snapfetti is committed to ensuring that data is stored, archived or disposed of in a safe and secure manner. We have procedures in place to try and prevent any unauthorised access or disclosures and to safeguard and keep secure the information that we

collect.

We use computer safeguards such as firewalls and data encryption, we enforce physical access controls to our buildings and files, and we authorise access to Personal Data only for those employees who require it to fulfil their job responsibilities. All data at rest and in transit is encrypted and we employ TLS encryption for data transferring between our App and servers. We maintain detailed breach identification and mitigation plans and all staff are trained in managing potential compromise scenarios.

However, you should be aware that providing information over the internet can never be guaranteed as being completely safe and if you choose to send such information to us via the internet, you do so at your own risk.

YOUR RIGHTS UNDER DATA PROTECTION LEGISLATION

You have access to the following rights under Data Protection Legislation:

Right to object

You have the right to object to us handling your Personal Data when:

- a) we are handling your Personal Data based on our legitimate interests (as described in the “*Information We Collect and Use at Snapfetti*” section above). If you ask us to stop handling your Personal Data in this way, we will stop unless we can show you that we have compelling grounds as to why our use of your Personal Data should continue; or
- b) for marketing purposes. If you ask us to stop handling your Personal Data on this basis, we will stop.

Right of access

You are entitled to receive confirmation as to whether your Personal Data is being processed by us, as well as various other information relating to our use of your Personal Data.

You also have the right to access your Personal Data which we are handling.

Right to rectification

You have the right to require us to rectify any inaccurate Personal Data we hold about you. You also have the right to have incomplete Personal Data we hold about you completed, by providing a supplementary statement to us.

Right to restriction

You can restrict our processing of your Personal Data where:

- a) you think we hold inaccurate Personal Data about you;
- b) our handling of your Personal Data breaks the law, but you do not want us to delete it;
- c) we no longer need to process your Personal Data, but you want us to keep it for legal reasons; or
- d) we are handling your Personal Data because we have a legitimate interest, and are in the process of objecting to this use of your Personal Data.

Where you exercise your right to restrict us from using your Personal Data, we will then only process your Personal Data when you agree, except for storage purposes and to handle legal claims.

Right to data portability

You have the right to receive the Personal Data we hold about you in a structured, standard machine readable format and to send this to another organisation controlling your Personal Data.

Right to erasure

You have the right to require us to erase your Personal Data which we are handling in the following circumstances:

- a) we no longer need to use your Personal Data for the reasons we told you we collected it for;
- b) where we needed your consent to use your Personal Data and you have withdrawn your consent;
- c) you object to our use of your Personal Data and we have no compelling reason to carry on handling your Personal Data;
- d) our handling of your Personal Data has broken the law; or
- e) we must erase your Personal Data to comply with a law we are subject to.

Right to complain

You have the right to lodge a complaint with the Information Commissioner's Office, the supervisory authority for data protection issues in England and Wales.

CHANGES TO THIS PRIVACY NOTICE

Any changes we make to our Privacy Notice in the future will be posted on this page and, where appropriate, notified to you by e-mail or notification within the App.

Please check back frequently to see any updates or changes to our Privacy Notice.

ENQUIRIES

Questions, comments and requests regarding this Privacy Notice are welcomed and should be addressed to hello@snapfetti.com.

This Privacy Notice was last updated June 2024