

Welcome to Imagine mobile’s privacy policy.

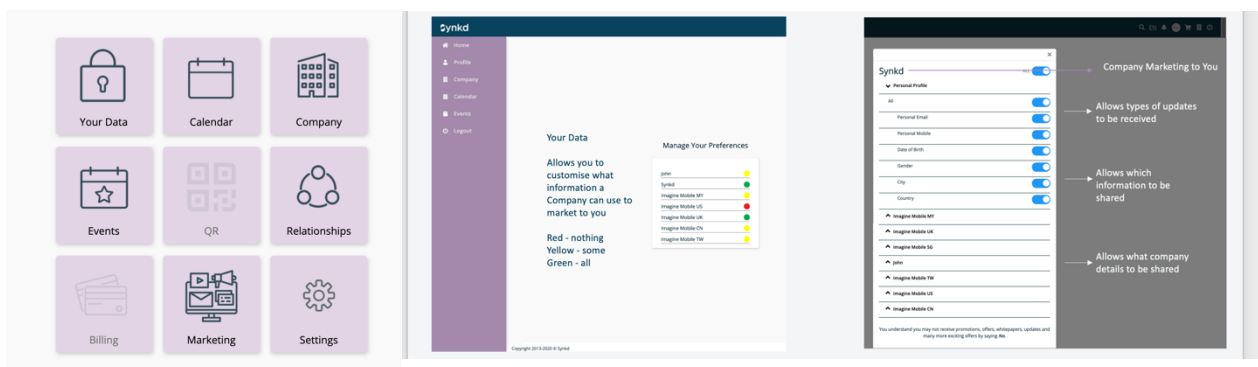
Imagine Mobile Limited of 7 Bell Yard London WC2A 2JR, United Kingdom and its subsidiaries in any country (“Imagine”) is committed to protecting Customer data with this “Privacy Policy” outlining how we work with partners to collect and use data within our campaigns. Imagine work with partners to deliver some aspects of the campaign. Our main collaboration is with Synkd Limited (Synkd.life), who hold all data from Imagine campaigns.

Synkd is a cloud-based technology platform (‘Software’) offering a variety of digital transformation tools including but not limited to emailing, surveys digital Ads, landing pages, booking, SMS (‘Solutions) for you as an individual or an employee of a company (‘Customers’).

Synkd

Synkd collects data across all Solutions in varying degrees and has developed a proprietary Solution called [Your Data](#) to empower every Customer to use data responsibly by empowering the end user “Customers” to control the data being used to market to them via Synkd.

Synkd encourages, and advises, all Customers to control and manage their data. This can be done via <https://My.Synkd.life> “MSL” and going to Your Data as outlined below



Simple toggles empower users to control their data across Digital Ads, Email, SMS, Events and many more Synkd Solutions

What Information do we collect?

(Anonymous) Non-Personally Identifiable Information (Non-PII)

When a Consumer interacts with an Imagine campaign, Synkd may collect anonymous information from the campaign such as, but not limited to, device information, advertising data and other content that you have viewed, your location or information about the routing or timing of any interaction (traffic data). This information consists of anonymous non-personally identifiable information (‘Non-PII’), and is collected in order to help Imagine conduct business with current and prospective Customers. Non-PII, which may include anonymous identifiers associated with your mobile device, does not identify you personally, and may come

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from such sources like your mobile web browser, or the apps that you use. Imagine is the sole owner of the Non-PII collected but we may share it with our customers.

We use Non-PII to provide value-added services such as advertising customised to the anonymous individuals' inferred interests, preferences and locations, and to perform analysis aimed at improving our Solutions and Software.

Imagine work with some third-party suppliers 'Partners' to deliver some Solutions. Partners include, but are not limited to publishers, SMS providers, email gateways to name a few. The information collected may help us to offer filtering options for "Partners" to manage the services they provide Imagine including additional targeting for Customers.

Personally Identifiable Information (PII)

Imagine can cross map non-PII data with consent-based data sources, including Synkd's Your Data within "MSL" where you have voluntarily disclosed your personal information to Customers to convert Non-PII into personally identifiable information ('PII'). Where you have not consented to cross mapping you are able to view these customers using your data within Synkd and toggle off your PII data via Your Data in MSL

As an example, Imagine's digital ads may contain a reference to an anonymous identifier associated with your mobile device. If you subsequently use that mobile device to knowingly disclose PII such as your name, mobile phone number or email address to our Customers, our Customer Relationship Marketing "CRM" tool will be able to match your Non-PII to your PII. You can toggle off the use of your data via My.synkd.life at any time.

Imagine does not match your PII to your location and it does not make this combined Non-PII and PII information publicly available, but some Imagine customers may build Non-PII audience clusters based on the PII profile and uses those clusters to send tailored content such as advertising or emails based on the common characteristics of the cluster.

All data used to communicate to you can be managed via https://my.Synkd.life/user_data or by emailing us at Privacy@imagine-mobile.com. However, please note that if you do so the quality of cluster based communication that you enjoy may be compromised.

Location

Imagine and its Partners collect anonymous non-personally identifiable information ('Non-PII') from campaigns which may include location data.

Data Collection and Audience Clusters

Imagine, on behalf of our Customers and Partners, may collect information from users such as yourself. This may occur, for example, if you submit information in response to a digital Ad on behalf of a Customer or engage in landing page with a form fill. Such information may consist of PII, Non-PII, or both. In such situations, we collect and process the information on behalf of our Customer or Partner however the data is subject to the Customer's privacy policies and associated opt-outs.

Customers who create, manage and analyse campaigns can create audience clusters for further targeting and relevant communication. In the event you wish to opt out of having your Non-PII used to allow us to provide display interest-based clustered used to infer your interests, preferences and locations, or to perform analysis aimed at improving our Solutions, you can do so by opting out via MSL. However, please note that if you do so the quality of interest-based content that you enjoy may be compromised.

Partner Websites

Imagine may provide Solutions that link to Partner sites/ apps or content. This Privacy Policy does not extend to any Partner, or any services offered by a Partner.

International Transfers

Customer may share your information with Third Parties who are based in countries outside of your country of residence (for example, if you are an EU resident, they may share your information with non-EU customers or affiliates). While some countries may not have data protection laws that are equivalent to those of the country in which you reside, Imagine will take all reasonable measures to protect your data in accordance with this Privacy Policy and applicable legal requirements.

Consent, Right to Access and be Forgotten

By interacting or submitting PII using an Imagine Campaign such as a landing page you consent to Synkd holding data on you which you can toggle off within MSL. You have the right to access all PII held on you. Please email us at privacy@Synkd.life and we will send you a link to review all PII being held on you. You will also be able to opt out of any PII Synkd holds.

Data Portability and Breach Notification

Synkd does not share data with Third Parties and all Customers own their own data. Synkd holds the protection of all data with the highest security. We will inform you within 72 hours of any breaches in our security.

Children's Privacy

Imagine is very sensitive to the issue of children's privacy. We do not knowingly collect any personal information about children under the age of 13. If we become aware that we have collected personal information about a child under the age of 13, that information will be immediately deleted from our database.

Use of Cookies

Imagine uses cookies via Synkd to ensure that your preferences are recorded and used to tailor content for you. To remove, simply clear cookies in the browser on your device. The domains of our cookies are listed below:

- <https://api.synkd.life>
- <https://api-dev.synkd.life>
- <https://graphql.synkd.life>
- <https://graphql-dev.synkd.life>
- <https://marketing.synkd.life>
- <https://marketing-dev.synkd.life>
- <https://studio.synkd.life>
- <https://studio-dev.synkd.life>
- <https://my.synkd.life>
- <https://my-dev.synkd.life>
- <https://events.synkd.life/>
- <https://events-dev.synkd.life/>
- <https://studio-cdn.synkd.life>
- <https://media-cdn.synkd.life>
- <https://synkd.life.cn>

Security

Imagine takes steps to protect the security of information that we collect. To that end, we have designed and deployed software, and networking solutions in an effort to reasonably secure and protect access to our systems and data.

Legal Disclaimer

We may need to disclose information, including PII, when in our good-faith judgment we are required to do so by law, or when such action is necessary to comply with a current judicial proceeding, a court order or legal process. We may also transfer all or some of the data discussed in this policy, in connection with a corporate merger, acquisition, and sale of assets, bankruptcy, or other corporate change.

Duration of Data Retention

Imagine will only retain Non-PII and PII for as long as it remains useful for the purposes outlined in this Privacy Policy. Imagine monitors its data retention on a regular basis to ensure that it does not retain Non-PII and PII for longer than is necessary.

Changes to Privacy Policy

Imagine is committed to continually examining and reviewing its privacy practices and may make changes to its Privacy Policy. In the event that any changes that we believe are material are made to the company's privacy practices, we will post a revised Privacy Policy on this website.

Local Data Protection Laws including GDPR, PDPC and CCPA

Imagine endeavours to be compliant with all local data protection laws and gives Customers full access to their data via MSL

Questions and Concerns:

If you have any questions or concerns about our privacy practices, you may contact us: Synkd Ltd, 7 Bell Yard, London, UK Email: privacy@imagine-mobile.com

Privacy Policy updated June 2022