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## PRIVACY POLICY

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### **BACKGROUND:**

Project Imagine Limited understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website, [www.dozens.com](http://www.dozens.com) ("The Site") and only collect and use your personal data as described in this Privacy Policy. Any personal data we collect will only be used as permitted by law.

Please read this Privacy Policy carefully and ensure that you understand it.

### **1. Information About Us**

The Site was operated by Project Imagine Ltd, a limited company registered in England under company number 11153882, until its application for strike-off ("The Application for Strike-off").

Following The Application for Strike-off, The Site is operated by Truva Corporate Administration Ltd.

Registered address for Project Imagine Ltd and Truva Corporate Administration Ltd: Third Floor, 30 Bedford Street, London, England, WC2E 9ED.

### **2. What Does This Policy Cover?**

This Privacy Policy applies to:

- a) your use of The Site. The Site may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.
- b) Certain data retained on past customers of Dozens, a trading name used by Project Imagine Ltd from 2019 until 31 August 2022. Project Imagine was previously authorised as an e-money institution (Financial Conduct Authority (FCA) past FRN 900894) and as an investment firm (past FRN 814281). Any such data retained is the minimum data legally required to be retained to support fulfilment of potential regulatory requirements that may arise beyond The Application for Strike-off and until 31 August 2028, at which point all such data shall be deleted.

### **3. What Is Personal Data?**

Personal data is defined by the UK GDPR and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

### **4. What Are My Rights?**

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 10.
- b) The right to access the personal data we hold about you. Part 9 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 10 to find out more.
- d) The right to be forgotten, i.e., the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 10 to find out more.
- e) The right to restrict (i.e., prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in any cases.
- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 10.

It is important that your personal data is kept accurate and up to date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 10.

## **5. What Personal Data Do You Collect and How?**

### **a) The Site**

The Site collects certain information automatically, including your IP address, the type of browser you are using and certain other non-personal data about your computer or device such as your operating system type or version, and display resolution.

If you send us an email, we may collect your name, your email address, and any other information which you choose to give us. For the purposes of the Data Protection Legislation, we are the data controller responsible for such personal data.

The lawful basis under the Data Protection Legislation that allows us to use such information is article 6(1)(f) of the UK GDPR which allows us to process personal data when it is necessary for the purposes of our legitimate interests, in this case, the proper operation and functionality of The Site. If you contact us as described above, you will be required to consent to our use of your personal data to contact you. In this case, our lawful basis for using your personal data will be article 6(1)(a) of the UK GDPR, which allows us to use your personal data with your consent for a particular purpose or purposes.

b) Past Dozens customers

The personal data we retain on past Dozens customers includes:

- Name
- Address
- Telephone number
- Email address
- Date of birth
- Photograph submitted during on-boarding process
- Bank account and payment card details
- Transaction data: payments to and from customer accounts
- Chat, telephone and email logs including date, time, phone number or email address and content.

We have never collected and do not retain any Special Category Data (race, ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, genetic or biometric data, or information about health (other than to identify vulnerable customers)) or information about criminal convictions or offences.

The lawful basis under the Data Protection Legislation that allows us to use such information is article 6(1)(b) of the UK GDPR, which allows us to process personal data when it is necessary for the performance of a contract, and article 6(1)(c), which allows us to process personal data when it is necessary for the compliance with a legal obligation to which the controller is subject, in this case the UK Money Laundering Regulations.

## 6. **Cookie Policy**

Our website only uses cookies that are 'strictly necessary' to run our website and keep it secure. These cannot be turned off as they are needed to keep you and us safe.

## 7. **How Do You Use My Personal Data?**

Where we collect any personal data, it will be processed and stored securely, for no longer than is necessary considering the reason(s) for which it was first collected. We will comply with our obligations and safeguard your rights under the Data Protection Legislation at all times. For more details on security see Part 7, below.

As stated above, we do not generally collect any personal data directly from you from the use of this Site. The technical data referred to above is necessary for the technical operation of The Site and will not normally be used in any way to personally identify you.

For past Dozens customers, we will use your data only for the performance of a contract, e.g. the return of unclaimed customer funds, and for compliance with legal obligations to which Project Imagine Limited is subject, such as regulatory or law enforcement requests for information and court-mandated Account Freezing Orders or Account Forfeiture Orders under the UK Money Laundering Regulations.

If you contact us and we obtain your personal details from your email, we may use your personal details to respond to your email.

We will not share any of your personal data with any third parties for any purposes other than storage on a web hosting server or for fulfilment of rights that you have as a data subject, including data subject access requests, requests for rectification or erasure of personal data and objections to processing.

## 8. How and Where Do You Store My Data?

At present we only store your personal data in the UK. This means that it will be fully protected under the Data Protection Legislation.

If, at a future date, we, our processors or sub-processors store or transfer some or all of your personal data to countries outside of the UK, we will use specific approved contracts which ensure the same levels of personal data protection that apply under the Data Protection Legislation. For further information, please refer to the [Information Commissioner's Office](#).

Personal data security is essential to us. To protect personal data, we take the following measures:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality; and
- having procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so.

## 9. Do You Share My Personal Data?

We will not share any of your personal data with any third parties for any purposes, subject to the following exceptions:

We may contract with the following third parties for hosting and data storage purposes:

- Website hosting: Rocket SaaS
  - Address: 164-180 Union St, London, SE1 0LH
  - Telephone number: 0203 283 8613
  - Email: [info@rocket-saas.io](mailto:info@rocket-saas.io)
- Past Dozens customer data
  - Data storage:
    - Amazon Web Services EMEA SARL, UK Branch
    - 1 Principal Place, Worship Street, London EC2A 2FA
  - Administration of residual customer funds, and data control and retention requirements continuing beyond The Application for Strike-off:
    - Truva Corp
    - 3rd Floor, 30 Bedford Street, London WC2E 9ED
    - Telephone number: 44 20 7961 9005.
    - Email: [dozens@truvacorp.com](mailto:dozens@truvacorp.com).

If any of your personal data is transferred to a third party, as described above, we take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 7.

If any personal data is transferred outside of the UK, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation, as explained above in Part 7.

If we sell, transfer, or merge parts of our business or assets or place customer or client assets in a trust, your personal data may be transferred to a third party. Any new owner of our business or trustee of customer or client assets may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal

obligations, a court order, or the instructions of a government authority.

#### **10. How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 10.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

#### **11. How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of the Directors):

Email address: [dozens@truvacorp.com](mailto:dozens@truvacorp.com).

Address: Third Floor, 30 Bedford Street, London, England, WC2E 9ED.

#### **12. Changes to this Privacy Policy**

We may change this Privacy Policy from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on The Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of The Site following the alterations. We recommend that you check this page regularly to keep up to date. This Privacy Policy was last updated on 17 May 2024.