## **Privacy Policy**

### Effective Date: June 26, 2025

This Privacy Policy explains how Annivio, owned by Luska Design Ltd, a company registered in the United Kingdom, collects, uses, and protects your personal data when you use our website and services.

We are committed to respecting and protecting your privacy in line with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

### 1. Who We Are

Annivio ("Annivio", "we", "us", or "our") is the controller of your personal data.

### 2. What Data We Collect

# We may collect and process the following types of personal data:

- Contact Information: name, email address, phone number
- Photobook Content: photos and captions you upload to create your books
- Payment Information: billing address, transaction data (via secure third-party processors like Stripe)
- Technical Data: IP address, browser type, device info, usage data, cookies
- Communication Preferences: newsletter opt-in status, messages you send us

### 3. How We Use Your Data

### We use your data to:

- Create and manage your account
- Process and deliver your photo book orders
- Send updates about your order or account
- Respond to your questions or feedback
- Improve and personalise your experience
- Send marketing emails (only with your consent)
- Comply with legal and regulatory obligations

## 4. Legal Basis for Processing

### We process your data based on the following legal grounds:

• Contractual necessity: to fulfil your order or manage your account

- Consent: for marketing communications and optional features
- Legitimate interests: to improve our service and prevent fraud
- Legal obligation: where required by law

### 5. Who We Share Your Data With

# We only share your data when necessary, and always securely:

- Payment processors (e.g. Stripe)
- Print and delivery partners (to fulfil your book orders)
- IT and analytics providers (e.g. hosting, email, analytics services)
- Legal and regulatory authorities, if required by law

## We do not sell or rent your personal data to third parties.

#### 6. Data Retention

# We retain your personal data only as long as necessary:

- For account and order management: typically 6 years (for tax and legal compliance)
- For marketing: until you unsubscribe or withdraw consent
- For uploaded content: you can delete your projects at any time

# 7. Your Rights

### Under UK data protection law, you have the right to:

- Access the personal data we hold about you
- Request correction of inaccurate or incomplete data
- Request deletion of your data ("right to be forgotten")
- Object to or restrict certain types of processing
- Withdraw consent at any time (for marketing)

# To exercise any of these rights, contact us at hello@annivio.com

# 8. Cookies and Tracking

## We use cookies to:

- Enable basic website functionality
- Understand user behaviour and improve our site
- Manage logins and shopping carts

Provide optional analytics and performance tracking

### 9. International Data Transfers

Your data may be stored or processed outside the UK (e.g. cloud services). Where this occurs, we ensure appropriate safeguards are in place, such as Standard Contractual Clauses.

## 10. Updates to This Policy

We may update this Privacy Policy from time to time. We will notify you of any material changes via a notice on our website.

### 11. Children's Privacy

Annivio is designed for use by adults, such as parents, guardians, and educators. We do not knowingly collect or process personal data relating to children under the age of 13 (or the relevant age of digital consent in your jurisdiction).

While our users may upload photos that include children (e.g. for school or team photobooks), this content is provided by and remains under the control of the adult account holder. We do not request, collect, or store identifying information *about* children, such as names, birthdates, or contact details, for any purpose.

If we become aware that personal data of a child has been submitted in a way that does not comply with this policy, we will take appropriate steps to delete that data.

If you believe we may have unintentionally collected information about a child, please contact us immediately at <a href="mailto:hello@annivio.com">hello@annivio.com</a>.