



The Library® Privacy Notice

November 2023

Key Words:

“You/Your”

Library Members

“Us/We/Our”

The Library®, registered with Isle of Man Company Registry as “The Library” Dating Service Ltd and Netcetera

“App/site”

The web-based app of which you are a member

“Data”

The information that you choose to input into the app, including your personal details, dating preferences and other choices

Introduction:

Your privacy is of ultimate importance to us.

Our site necessarily collects and stores the data that you enter onto the site.

The policy below outlines the data that we collect and store, how we use it, how long we keep it and your legal rights when it comes to data.

Data Protection and the law:

We operate according to GDPR (General Data Protection Regulation) which is part of the Isle of Man Data Protection Act 2018.

This means that we take measures to keep your data secure and minimise the risk of data breach or loss of data.

In order to do so, we operate under the 6 key principles of data processing. In this context, data processing means the collecting, storing and use of data:

Principle 1:

Lawfulness, fairness and transparency

“Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject”

We only collect data that you consent to provide.

The data that you provide must be true and accurate at the time that you provide it.

If it is found that you have provided untrue or inaccurate data, you and your data will be removed from The Library.

If it is found that you have provided untrue or inaccurate data for the purpose of criminally deceiving or harming another member, or The Library, we will inform the police.

We strive to be fully transparent about how your data is used within the app. This is evidenced during the login process, for example, where we tell you how your data is used and what will be visible in your public profile.

We are also clear about how your data is used in order to match you with other Library members.

We will never use your data for any other reason beyond:

1. Communicating with you in the following ways:

Email: through the email services Mailchimp or MailerLite;

Email: through automatic notifications about Daily ORs, connections, chats and dates.

You can unsubscribe from both of these communications methods by following the link in the email that you receive.

2. Matching you with other Library members (through the profile information that you provide, preferences that you state and choices that you make in The Library).

We will never knowingly or deliberately pass your data on to any other companies that are not directly involved in the ownership or maintenance of The Library.

As of July 2023, the companies involved in The Library, and as such have access to your data, are:

1. "The Library" Dating Service Ltd - owner of The Library app
2. Netcetera Ltd - responsible for building, hosting and maintaining The Library App

You can contact us, including our Data Protection Officer, in one the following ways:

Email: hello@thelibrary.im

Using the "Contact Us" button within the account section of the app

We will take reasonable steps to protect your data, using strong security standards. However, your data is not encrypted and you consent to providing it in the full knowledge that nothing on the internet is 100% secure.

We will only keep your data for as long as you are a Library member.

When you decide to leave The Library, your data will be permanently erased from our database.

If you have a complaint about the way we have handled your data, please get in touch with us. You also have the right to contact the Information Commissioner. See www.inforights.im for more details.

Principle 2:

Purpose limitation

“Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes”

In order to comply with Know Your Customer (KYC) Guidelines, specifically in ensuring all members are over the age of 18, our member registration involves an ID verification process. Our ID verification process offers two choices, “soft” and “hard” ID verification. These two choices are explained clearly during the registration process, and in our terms and conditions. The Library does not store your data with either of these options, as both options utilise a 3rd party:

Soft: Stripe (payment processor)

<https://stripe.com/en-gb-us/privacy#1-personal-data-that-we-collect-and-how-we-use-and-share-it>

Hard: One ID (ID verification specialist) <https://oneid.uk/oneid-privacy-notice>

Our access to these 3rd party providers is protected through strong multi factor authentication methods.

Beyond this, we will only collect and process data that enables us to:

1. Contact you via email or text message
2. Match you with other Library members
3. Connect you with other Library Members (this involves purchasing Stamps - please see Terms and Conditions for details.)

At no point will other Library members be able to access your email address or mobile phone number. This data will never knowingly or deliberately be made public.

We will use other data, such as your first name, your stated age, your gender identification, your age and gender preferences and other choices that you make during your interaction with the app, in order to match you with other Library members. This data will be public within The Library, but will never be publicly available to internet users who are not members of The Library.

We will never use your data to then target you with adverts for other businesses, products or companies based on the choices you make inside The Library.

Principle 3:

Data minimisation

“Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed”

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Hard: One ID (ID verification specialist) <https://oneid.uk/oneid-privacy-notice>

Our access to these 3rd party providers is protected through strong multi factor authentication methods.

Beyond this, we will only ever ask you for data that is necessary for us to:

1. Contact you via email or text message
2. Match you with other members of The Library
3. Connect you with other Library Members (this involves purchasing Stamps - please see Terms and Conditions for details.)

Principle 4:

Accuracy

“Personal data shall be accurate and, where necessary, kept up to date”

As part of our terms and conditions, we ask that the data that you provide must be true and accurate at the time that you provide it.

If it is found that you have provided untrue or inaccurate data, you and your data will be removed from The Library.

Once you have signed up to The Library, your age and gender identification cannot be changed. This to ensure that our app retains integrity in the way it matches members. During your time as

a member, if you wish to change your gender identification because you are going through, or have gone through, a process of gender transition, please get in touch with us directly through the “Contact Us” feature in your account.

Principle 5:

Storage limitation

“Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed”

We will keep your data in our database for the time that you are a member of The Library.

When you choose to leave The Library, we will remove all of your data from our database in accordance with your right to be forgotten.

If you choose to rejoin The Library, you will need to go through the sign-up process again.

Principle 6:

Integrity and confidentiality

“Personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures”

We will take reasonable steps to protect your data, using strong security standards. However, your data is not encrypted and you consent to providing it in the full knowledge that nothing on the internet is 100% secure.

We will never process your data in a way that contradicts any of the aforementioned ways stated in this policy.

We ask you to use a strong password that is at least 8 characters long and includes letters, numbers and special characters.

We advise that you never use your name, your birthday or any other information that you have previously shared on other social media (including other passwords) as your password. This is to mitigate against potential security breaches where other internet users might easily guess your password.

If you forget your password, we will send you an email so that you can reset it.

Final Thoughts

Your privacy is priceless.

We operate in a way that ensures that you can maintain it without compromising the authenticity of the connections that you make in The Library.

Please do all you can, especially when you connect with other Library members, to ensure that you are protecting your privacy at all times.

