

Gridded Privacy Policy



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Gridded values your privacy. This Privacy Policy explains how we collect, use, share, retain and protect your Personal Information when you access or use the Services, together with the rights and choices available to you. The table of contents below is provided to help you navigate the Policy.

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1 Introduction

Gridded is committed to handling your Personal Information responsibly and transparently. This Privacy Policy explains what We collect, how and why We use it, when We share it, how long We keep it, and the rights and choices available to you.

Please read this Privacy Policy alongside Our Terms of Service, Community Guidelines and any additional privacy information shown when you use a particular feature.

1.1 Purpose of this Privacy Policy

This Privacy Policy is intended to give you clear information about Our Processing of your Personal Information and how to exercise your rights.

1.2 Who We Are

The Services are operated by **[full legal company name]**, a company registered in England and Wales under company number **[company number]**, with its registered office at **[registered office address]**.

For the purposes of applicable data-protection law, Gridded is generally the Controller of the Personal Information described in this Privacy Policy, unless We explain otherwise.

In this Privacy Policy, Gridded, We, Us and Our refer to the legal entity operating the Services.

You can complete the company name, number and registered-office details once Gridded Ltd has been incorporated.

1.3 Scope

This Privacy Policy applies to the Gridded mobile application, website, communications with Gridded and any other Gridded service that links to it.

The Services are intended only for individuals aged 18 or over. Further information is provided in Chapter 16 (Children's Privacy).

This Privacy Policy does not govern the independent privacy practices of Booking Partners or other Third-Party Services. Their own privacy policies apply to information they process independently.

1.4 Definitions

For the purposes of this Privacy Policy, the following definitions apply:

Account means a registered User account that enables access to some or all of the Services.

AI Features means any artificial intelligence, machine learning or automated technologies made available through the Services, including destination recognition, media analysis, itinerary planning, route generation and travel recommendations.

Booking Partner means an independent third-party provider offering accommodation, flights, transport, tours, attractions, activities or other travel-related products or services accessible through the Services or its booking systems.

Controller means the person or organisation that determines why and how Personal Information is processed.

Personal Information means any information relating to an identified or identifiable individual. References to Personal Information in this Privacy Policy include “personal data” as defined under applicable data protection law.

Processing, process or processed means any operation performed on Personal Information, including collecting, recording, organising, storing, accessing, using, analysing, sharing, modifying, restricting, anonymising or deleting it.

Services means the Gridded mobile application, website and all associated products, features, technologies and services operated by Gridded.

Third-Party Services means websites, applications, products, platforms or services operated by organisations other than Gridded, including Booking Partners and providers supporting authentication, mapping, artificial intelligence, analytics, communications, infrastructure and other functionality.

User, you or your means any individual who accesses or uses the Services.

User Content means **photographs, videos, Stories, audio, messages, comments, captions, reviews, location tags and other content uploaded, created, submitted, posted or shared by a User through the Services.**

Where the words **including, include** or **such as** are used in this Privacy Policy, they are illustrative and not exhaustive.

2 Information We Collect

We collect Personal Information when you create or use an Account, use features, upload or share Content, communicate with others, plan trips, use AI Features, follow booking links or contact Us.

The information collected depends on the features you use, the permissions you grant and how you interact with the Services. Some information is necessary to create an Account or use particular features.

2.1 Information You Provide

We collect information that you choose to provide. The main categories are described in Sections 2.2 to 2.7.

2.2 Account Information

When you create or manage an Account, We may collect:

- your name or display name;
- username;
- email address;
- date of birth or confirmation that you are aged 18 or over;
- authentication and account identifiers;
- your chosen sign-in method;
- account creation and status information;
- login, verification and security information; and
- any other information required to register, secure or administer your Account.

Where you register or sign in using Apple, Google or another authentication provider, We may receive information authorised through that provider, such as your name, email address and authentication identifier.

Passwords and other authentication credentials may be processed by Our authentication provider rather than being directly accessible to Gridded. Further information is provided in Section 10.2.

2.3 Profile Information

When you create or update your profile, We may collect information such as:

- your display name and username;
- profile photograph;
- biography;
- broad profile location, such as a town, city, region or country;
- travel interests, preferences and selected categories;
- links or other information you choose to add to your profile;
- followers, following lists and other social connections;
- Stamps, saved achievements or other profile activity; and
- profile visibility and privacy settings.

Some profile information may be visible to other Users or the public, depending on your settings and the feature used. Only add information that you are comfortable sharing.

2.4 User-Generated Content

We collect the content and related information that you upload, create, submit, post or share through the Services. This may include:

- photographs and videos;
- captions, comments, replies and reviews;
- audio, voiceovers or other recordings;
- destination, activity and location tags;
- dates, timestamps and itinerary details;
- visible text, people, objects, landmarks and other information contained within uploaded media;
- metadata associated with your media, where available and permitted;
- likes, reactions, saves and other interactions with Content; and

- reports, complaints or moderation information connected with Content.

User Content may contain Personal Information about you or other people. Depending on your settings and how you use the Services, it may be visible to other Users or the public.

Only upload Content that you are entitled to share, and consider whether it reveals sensitive information about you or another person, such as precise locations, travel plans or identification documents.

Selected photographs, video frames, visible text, metadata and location information may also be processed through Gridded's AI Features to identify destinations, places and activities or to generate trip and route suggestions. Further information is provided in Chapter 6.

2.5 Messages Between Users

When you use messaging features, We may collect and process:

- the contents of messages and replies;
- photographs, videos, GIFs, links, audio or other attachments sent through messages;
- the identities of the sender and recipient;
- the date and time a message was sent, delivered, opened or otherwise interacted with;
- message requests, reactions and related interaction information;
- blocking, reporting and safety information; and
- technical information needed to deliver and secure messages.

Messages are intended for the participants in the conversation. We may access or review them where necessary to operate the messaging service, respond to a report or support request, investigate suspected misuse or safety concerns, comply with law, or protect Users and the Services.

Gridded does not treat private messages as public Content. However, recipients may copy, save, screenshot or share messages outside the Services, and Gridded cannot control how recipients use information after receiving it.

Users should not send highly sensitive information through messages, such as passwords, payment-card information, passport details or other identification documents.

These sections should accurately describe the data Gridded actually collects at launch. Anything not collected—such as read receipts, metadata, home location or voice messages—should either be removed or clearly described as applying only where the relevant feature is available. A privacy notice should identify the types of personal information collected and explain them clearly rather than listing speculative processing as though it already occurs.

2.6 Saved Trips and Itineraries

When you save destinations, activities, posts or other travel content, or create or manage a trip or itinerary through the Services, We may collect and process information such as:

- saved destinations, activities, posts and collections;
- bucket-list items;
- trip names, destinations and dates;
- itinerary stops and the order in which they appear;
- selected routes, travel modes and estimated journey information;
- accommodation, activity or transport options added to an itinerary;
- travel preferences, trip duration and travel style;
- notes or other information you add to a saved trip or itinerary;
- links between saved Content and a trip or itinerary; and

- changes, updates and interactions relating to saved trips and itineraries.

We use this information to provide and maintain trip-planning features, display your saved travel content, generate or improve itinerary suggestions and personalise relevant parts of the Services.

Saved trips and itineraries are private to your Account unless you choose to share them or a sharing feature is clearly made available.

Where an itinerary is created or assisted by an AI Feature, selected information about the relevant destinations, activities, dates, preferences and routes may be processed to generate or refine the itinerary. Further information is provided in Chapter 6.

2.7 Booking Information

Gridded does not currently process payments or complete travel bookings directly. When you choose to view or book accommodation, flights, activities or other travel services, you may be redirected to, or shown content from, an independent Booking Partner.

Depending on the Booking Partner, affiliate arrangement and feature used, We may collect or receive limited information such as:

- the Booking Partner or booking link you selected;
- the destination, activity, accommodation or other travel option associated with the selection;
- the date and time of the click or referral;
- referral, campaign or affiliate identifiers;
- device, browser or technical information connected with the referral;
- whether a referral resulted in a booking or other conversion, where this information is provided to Us;
- general booking value, commission or transaction-status information, where provided; and
- customer-support information you provide to Gridded about a booking-related issue.

We do not ordinarily receive or store full payment-card details, passport information or the complete booking information entered directly into a Booking Partner's service.

The Booking Partner independently determines how it collects and uses the information you provide when making a booking. Its own privacy policy and terms will apply to that processing.

Where a booking or referral is linked to your Account, saved trip or itinerary, We may use limited booking-related information to display relevant trip details, operate affiliate arrangements, measure referrals and improve the Services.

3 How We Collect Information

Gridded collects Personal Information in several ways, including information you provide directly, information collected automatically when you use the Services and information received from Third-Party Services.

This Chapter explains the main sources from which We collect Personal Information. Further details about the categories of information collected are provided in Chapter 2.

3.1 Information You Provide Directly

We collect Personal Information that you enter, upload, post, send, save, select or otherwise provide when using the Services or communicating with Us.

If you provide Personal Information about another person, you should ensure that you are entitled to provide it and that doing so does not infringe their privacy or other rights.

3.2 Information Collected Automatically

When you access or use the Services, We may automatically collect certain information about your device, connection and use of the Services. Depending on the features used and the permissions granted, this may include:

- device type, model, operating system and app version;
- device or application identifiers;
- IP address and general location inferred from it;
- language, country, region and time-zone settings;
- network, browser and connection information;
- login dates, session information and authentication activity;
- pages, screens, posts and features viewed or used;
- searches, clicks, saves, likes, shares and other interactions;
- referral and affiliate-link activity;
- crash reports, diagnostic information and performance data;
- security events, error logs and suspected fraudulent or abusive activity;
- notification delivery and interaction information;
- cookie, software development kit and similar technology data, where applicable; and
- precise or approximate device location, where you have granted the relevant permission.

We may collect this information through application logs, cookies, pixels, software development kits and similar technologies provided by Gridded or its service providers.

Information collected automatically may be linked to your Account or combined with other information We hold where necessary to operate, secure, personalise or improve the Services.

Further information about location data and cookies or similar technologies is provided in Chapters 5 and 11.

3.3 Information from Third Parties

We may receive Personal Information from Third-Party Services where you use them to access or interact with Gridded, or where you or the provider permit information to be shared with Us.

Depending on the relevant service and your choices, these sources may include:

- authentication providers, such as Apple or Google, where you use them to create or access your Account;
- Booking Partners and affiliate networks;
- mapping, location and travel-information providers;
- analytics, security and performance-monitoring providers;
- communications, media and content-integration providers;
- other Users who mention, tag, message, report or share Content involving you;
- public sources, where lawful and relevant; and
- a business or service transferred to Gridded as part of a merger, acquisition or other corporate transaction.

The information received depends on the provider and may include basic sign-in details, place or route data, referral or conversion information, analytics or security data, and information about you provided by other Users.

One wording point to verify during development: only keep device identifiers, pixels, software development kits, public sources and third-party profile images if Gridded actually collects or plans to collect them.

4 Permissions We Request

Certain features require access to device functions or information, including your camera, photo and video library, microphone, location or notifications.

Your device may display a system permission request. We generally request access when you choose to use the relevant feature rather than requesting all permissions when you first open the Services.

You may decline or later withdraw a permission through your device settings. The relevant feature may then be unavailable, but unrelated parts of the Services should remain accessible where possible.

4.1 Camera Permission

We may request camera access when you choose to take a profile photograph, create a post, record a video, send media in a message or capture media for an optional AI Feature.

We access the camera only when you open a camera feature. Media is not posted, shared or sent for AI analysis unless you choose the relevant action. Recording video with sound may also require microphone access.

4.2 Photo and Video Library Access

When you choose to upload existing media, Gridded may open your device's system picker or request access to your photo and video library.

Depending on your device and settings, you may be able to select individual items or grant limited or broader access.

We use this access to let you select media for profile images, posts, messages, editing and optional AI Features.

Gridded receives only media that you select or otherwise choose to make available. We do not upload, publish, share or analyse unselected media merely because library access has been granted.

You can change library access through your device settings. Restricting access may prevent you from selecting new media or using certain upload features.

*One legal drafting point: it is better to call these **device permissions**, rather than treating each permission as GDPR "consent." An operating-system permission controls technical access, while Gridded must separately have an appropriate lawful basis for its processing under Chapter 8. Consent is not the only lawful basis available under UK data-protection law.*

4.3 Microphone Permission

We may request microphone access when you record video with sound, voiceovers, voice messages or other audio through the Services.

We access the microphone only while you actively use an audio-recording feature and do not record audio in the background.

You may refuse or withdraw microphone access through your device settings. This may prevent in-app recording, but it will not prevent you from uploading existing media that already contains audio.

4.4 Location Permission

We may request location access to show your current position, centre a map, suggest nearby places, use your position as a route starting point or help you select a location tag.

Depending on your device and settings, you may be able to share an approximate or precise location and choose whether access is allowed once or while using the Services.

Unless We clearly explain otherwise and obtain the necessary permission, Gridded requests location access only while you are using the Services and does not continuously collect location while the app is closed or in the background.

Where possible, you may still search for, select or enter a location manually without granting access to your device's location.

Location information will not automatically be displayed publicly merely because you have granted location permission. A location may become visible to other Users where you choose to attach it to public User Content, display it on your profile or otherwise share it through the Services.

You may restrict or withdraw location access through your device settings. This may affect features that rely on your current position, but other parts of the Services should remain available.

4.5 Notification Permission

We may request permission to send notifications about messages, social activity, saved trips, reminders, Account security, support or moderation matters, service updates and, where permitted, marketing.

Where permission is granted, We may generate or receive a push-notification token and process delivery or interaction information where available.

Notification content may appear on your lock screen depending on your device settings.

You may disable notifications through your device or Gridded settings. This will not prevent you from using the Services, although you may not receive alerts until you next open the app.

5 Location Information

Gridded may process precise or approximate device location, locations you search for or select, locations attached to Content, broad location inferred from technical information, and information received from mapping or place-search providers. Location is not made public unless you choose to share it through a profile, Story, post or other feature.

5.1 Precise and Approximate Device Location

When you use a feature that benefits from your current position, Gridded may request precise or approximate device location. Your operating system may let you allow access once, while using the app, or at a selected accuracy.

We may use precise location for an accurate map position, route starting point or nearby-place suggestion. Approximate location may be used where a broader area is sufficient.

Gridded does not continuously collect device location while the app is closed or operating in the background unless a future feature clearly requires it, the Processing is explained and the necessary permission is obtained.

Where possible, you may search for or select a location manually without granting Gridded access to your current device location.

Granting location permission does not cause your current position to be displayed publicly. Your location will be attached to User Content only where you choose or confirm the relevant location through the applicable feature.

5.2 Profile Location

You may choose to add a location to your Gridded profile.

The profile-location feature is designed to display a **broad geographic location**, such as a town, city, region or country. It is not intended to display your exact home address, precise device position or live whereabouts.

Your profile location may be visible to other Users or the public, depending on your profile visibility and the settings available through the Services. You should therefore select only a location that you are comfortable displaying to others.

Your profile location is separate from your device location. Granting Gridded access to your device's location does not automatically add that location to your profile, and your profile location will not be continuously updated based on your movements.

You may add, change or remove your profile location through the relevant profile settings.

5.3 Location Tags in Stories and User Content

You may attach a location to a Story, post or other User Content. The location may be selected manually, suggested using device location or provided through a mapping or place-search service, and may identify a specific venue or place.

Granting location permission does not automatically attach your current location to User Content. You must select or confirm a location before it is displayed with a Story, post or other shared Content.

A location tag will generally be visible to the same audience that can view the associated Content. Depending on the location selected and when the Content is shared, it may reveal your current or recent whereabouts, accommodation, activities or travel plans. You should consider whether you are comfortable sharing that information before publishing the Content.

Users who can view the Content may be able to save, screenshot or share it outside the Services. Gridded cannot control how other Users use location information after it has been shared with them.

Photographs and videos may contain embedded metadata, including information about where the media was created. Gridded will not automatically display embedded location metadata publicly merely because you upload the media. Where such metadata is processed to operate the Services or provide AI Features, it will be handled as described in this Privacy Policy. A location will be displayed with your Content only where you choose or confirm it through the relevant feature.

5.4 Stored Location Information and Location History

We may store broad profile locations, location tags, saved places, itinerary locations, route points and location searches for as long as needed to provide the relevant feature.

These records may show places you have visited, saved or planned to visit, but Gridded does not create a continuous record of your real-time movements merely because location permission has been granted.

Location information may remain associated with your profile, User Content, saved trips or itineraries until you remove the information, delete the relevant Content or close your Account, subject to the retention arrangements explained in Chapter 13.

Removing a location or deleting related Content may remove it from active display, although limited copies may remain temporarily in backups, security records or moderation records where reasonably necessary and permitted by law.

6 AI Processing

Gridded uses artificial intelligence and machine-learning technologies to provide features such as media analysis, destination recognition, place suggestions, itinerary creation and route generation.

When you choose to use an AI Feature, Gridded may process information you provide, including selected photographs, video frames, visible text, location information, metadata, travel preferences and other relevant instructions or context.

Some information may be sent to third-party AI providers, including Google services such as Gemini, so that they can process the information on Gridded's behalf and return relevant results. The particular information processed will depend on the AI Feature you choose to use.

AI processing may involve Personal Information where uploaded media or accompanying information identifies you or another person. You should avoid submitting sensitive, confidential or unnecessary Personal Information through AI Features.

Gridded does not configure its AI Features to perform facial recognition or biometric identification.

AI Features are optional unless clearly stated otherwise. Where appropriate, you may choose whether to use an AI-generated suggestion and may correct, reject or remove the result.

6.1 Photo Analysis

When you choose to analyse a photograph, Gridded may process the selected image, visible text and features, location context, relevant metadata and your instructions to identify destinations, activities or other travel information.

Selected photographs may be sent to an AI provider, including Google Gemini, which may return suggested places, activities, descriptions or tags.

Gridded will not submit every photograph in your device library for AI analysis merely because you have granted photo and video library access. Only photographs that you select or otherwise choose to process through the relevant feature will be analysed.

Photographs will not automatically be published or attached to a public post merely because they have been analysed. You must separately choose to create, save or share the relevant Content.

6.2 Video Analysis

When you choose to analyse a video, Gridded may extract selected still frames and process their visible features, text, location context, relevant metadata and your instructions.

Selected frames, rather than every moment of the video, may be sent to a third-party AI provider, including Google Gemini.

The original video may still be uploaded and stored where you choose to create a post or use another video feature. However, processing the video for publication is separate from sending selected frames for AI analysis.

If Gridded introduces an AI Feature that processes video audio, speech or a complete video file, We will provide appropriate information about that processing through this Privacy Policy or at the time the feature is introduced.

6.3 Destination Recognition

Destination recognition may analyse visual and textual clues, compare them with known places and combine AI results with mapping or place-search information to suggest locations, activities or tags.

AI-generated destination suggestions may be incomplete, inaccurate or identify a similar but incorrect place. Where appropriate, you should review and confirm the suggested location before it is attached to User Content, saved to your Account or used in a trip or itinerary.

A location suggested through AI analysis will not automatically be displayed publicly unless you choose to add or confirm it through the relevant feature.

Where media includes other people, Gridded's destination-recognition feature is intended to identify places and travel-related information rather than the identities of the people shown.

6.4 Route Generation

Route and itinerary suggestions may use places identified from media, locations you search for or save, trip dates, duration, preferences, transport choices and other instructions you provide.

AI may be used to organise locations, suggest an itinerary order or generate trip-related recommendations. Mapping and routing providers may then process the selected locations to calculate distances, journey times and available routes.

Generated routes and itineraries are suggestions only. You may review, edit, reorder, add or remove locations before saving or using them.

Gridded does not use route-generation features to continuously track your movements. Current device location will only be used where you choose a feature that requires it and have granted the relevant location permission.

6.5 AI Limitations

AI-generated results may be inaccurate or incomplete. Review them before relying on, publishing or using them, and verify important travel information through official or reliable sources.

Gridded's AI Features are not used to make solely automated decisions about you that produce legal or similarly significant effects. You retain control over whether to accept, reject, edit, save or share AI-generated travel suggestions.

Third-party AI providers may process and retain submitted information in accordance with the service configuration, contractual arrangements and applicable data-processing terms used by Gridded. The final Policy should identify the relevant AI service and accurately describe its retention and data-use arrangements once the production Gemini setup has been selected. Google's current Gemini API documentation distinguishes between standard abuse-monitoring retention and configurations eligible for zero data retention, so this should be verified before launch rather than making a blanket promise that submitted media is never retained.

This level of explanation is appropriate because the ICO requires organisations using AI with personal data to explain the processing transparently and to provide meaningful information about how AI-supported outcomes are produced and used.

7 How We Use Your Information

Gridded uses Personal Information to provide, personalise, protect and improve the Services, communicate with you and meet legal responsibilities. The lawful bases for these activities are explained in Chapter 8.

7.1 Providing the Services

We use Personal Information where necessary to provide and operate the Services and enable you to use their features. This may include using your information to:

- create, authenticate and manage your Account;
- create and display your profile;
- enable you to upload, publish and manage User Content;
- display Stories, posts, comments and other Content to the appropriate audience;
- enable messaging and other interactions between Users;
- save destinations, activities, posts, collections and bucket-list items;
- create, store and manage trips and itineraries;
- provide maps, routes, location searches and nearby-place features;
- provide AI Features, including media analysis, destination recognition and itinerary generation;

- process your searches and display relevant results;
- operate referral links and integrations with Booking Partners;
- remember your settings and preferences;
- send notifications or service communications you have enabled;
- provide requested customer support; and
- maintain the availability, reliability and functionality of the Services.

Some information is necessary for Gridded to provide a particular feature. Where you do not provide that information or grant the required device permission, the relevant feature may be unavailable, although you may still be able to use other parts of the Services.

7.2 Personalising Content

We may use Personal Information to tailor the Content, recommendations and features displayed to you.

Depending on how you use the Services, personalisation may be based on information such as:

- destinations, activities and travel categories you view or interact with;
- posts, Stories or accounts you follow, like, save, share or otherwise engage with;
- your searches and recently viewed Content;
- saved destinations, collections, trips and itineraries;
- travel interests, preferences and travel style;
- location information, where relevant and permitted;
- language, country, region and device settings; and
- feedback you provide about recommendations or Content.

We may use this information to:

- arrange or recommend posts and other Content within your feed;
- suggest destinations, activities, places or travel ideas;
- provide more relevant search results;
- suggest Content related to your saved trips and interests;
- show locally or regionally relevant information; and
- reduce the display of Content that appears less relevant to you.

Personalisation may involve automated systems that identify patterns in how the Services are used. These systems are intended to improve your experience and do not make decisions about you that produce legal or similarly significant effects.

Where controls are available, you may be able to influence personalisation by changing your preferences, removing saved information, unfollowing accounts or managing your location and privacy settings.

7.3 Improving the Services

We may use Personal Information to understand how the Services operate and to develop, test and improve their features.

This may include using information to:

- identify and resolve technical problems, errors and crashes;
- monitor the performance, reliability and usability of the Services;
- understand how Users interact with screens, features and Content;
- assess which features are useful or require improvement;
- improve search results, recommendations and Content organisation;
- evaluate and improve maps, routes, itineraries and travel-planning features;
- test and improve the accuracy and usefulness of AI Features;
- develop and test new products, features and functionality;

- conduct internal research and analysis; and
- respond to feedback and suggestions provided by Users.

Where reasonably possible, We may use aggregated or de-identified information for research, analysis and service-improvement purposes.

When drafting Chapter 8, each purpose in Chapter 7 should be matched to its applicable lawful basis rather than assuming that one basis covers the entire Services.

7.4 Safety and Moderation

We may use Personal Information to protect Users, maintain the safety and integrity of the Services and enforce Our Terms of Service and Community Guidelines.

This may include using information to:

- receive, assess and respond to reports concerning Users, User Content, messages or other activity;
- identify, prevent and investigate harassment, abuse, spam, scams, impersonation, fraud or other prohibited conduct;
- detect Content or activity that may be unlawful, harmful or contrary to Our policies;
- investigate suspected misuse of Accounts or features;
- prevent unauthorised access and protect Account security;
- enforce age and eligibility restrictions;
- restrict, remove or preserve User Content where appropriate;
- issue warnings or restrict, suspend or terminate Accounts;
- manage blocks, reports and other safety controls;
- respond to emergencies or situations involving a credible risk of harm; and
- cooperate with lawful requests from public authorities where required.

To carry out these activities, We may process User Content, reports, communications submitted to Us, Account information, interactions between Users and relevant technical or security information.

We may use automated systems to help identify potentially harmful, unlawful or prohibited Content or activity. Automated indicators may assist Our review but may not always be accurate. Where appropriate, suspected breaches may be assessed by Gridded before enforcement action is taken.

We do not routinely review private messages without a reason to do so. However, We may access and review messages and related information where a participant reports a conversation, where reasonably necessary to investigate suspected misuse or safety concerns, or where required by law.

Information connected with reports, investigations or enforcement action may be retained where reasonably necessary to maintain safety records, prevent repeated misuse, resolve disputes or meet legal obligations.

7.5 Customer Support

We use Personal Information to provide customer support and respond when you contact Us.

This may include using information to:

- respond to questions, enquiries and feedback;
- investigate and resolve technical or Account-related problems;
- verify that you are the Account holder where reasonably necessary;

- assist with access, security or login issues;
- respond to reports, complaints or appeals;
- help with trips, itineraries, posts, messaging or other features;
- investigate issues involving Booking Partner links or referrals;
- process privacy and data-protection requests;
- keep records of support enquiries and their outcomes; and
- improve Our support processes and guidance.

When you contact Us, We may process the information you provide, together with relevant Account, device, technical or activity information needed to understand and resolve the issue.

Please avoid including sensitive or unnecessary Personal Information in a support request. Where additional information is required, We will seek to request only what is reasonably necessary to deal with your enquiry.

Support communications and related records may be retained for a reasonable period to resolve the matter, maintain an accurate history of the request, improve Our support service, establish or defend legal claims and meet applicable legal obligations.

7.6 Analytics and Performance Monitoring

We may use usage, device, diagnostic and performance information to understand how the Services are used, identify technical problems, monitor security and improve functionality.

This information may be collected through application logs, cookies, software development kits and similar technologies operated by Gridded or Our service providers.

Where reasonably possible, We may aggregate or de-identify analytics information so that it is no longer reasonably capable of identifying an individual.

Where applicable law requires consent before non-essential cookies or similar storage and access technologies are used, We will request that consent and provide relevant controls. Further information is provided in Chapter 11.

For the final version, the analytics wording should be checked against the exact services and SDKs included in the production app, such as Firebase Analytics, Crashlytics or any attribution provider.

7.7 Search History

We may collect search terms, filters, selected results and related interactions to provide search results, show recent searches, personalise recommendations, improve search and detect misuse.

Search history may be associated with your Account. Where controls are available, you may be able to view, remove or clear recent searches.

Clearing search history may remove it from active display, although limited information may remain temporarily in backups, analytics or security records where lawfully retained.

7.8 Communications

We use contact details and relevant Account information to send service, security, support, moderation, legal and, where permitted, marketing communications.

Some communications are necessary to operate the Services or protect your Account. You may not be able to opt out of essential service, legal, safety or security communications while maintaining an active Account.

You may manage optional push notifications through your Gridded settings, where available, or through your device settings.

We will send electronic marketing communications only where We have an appropriate lawful basis and satisfy any consent requirements that apply. Marketing messages will provide a method of withdrawing or changing your marketing preferences. Withdrawing from marketing will not prevent Us from sending essential non-marketing communications concerning your Account or the Services.

We may process information about the delivery of and interaction with communications, such as whether an email, notification or in-app message was delivered, opened or selected, where this information is available and lawfully collected.

7.9 Legal Compliance

We may use, retain or disclose Personal Information where necessary to comply with law, respond to valid requests, maintain required records, establish or defend legal claims, enforce Our policies, investigate unlawful activity or protect the rights and safety of Gridded, Users or others.

Before disclosing Personal Information in response to a request, We may take reasonable steps to assess whether the request is valid, lawful and proportionate. Where permitted and appropriate, We may limit the information disclosed to what is reasonably necessary for the relevant purpose.

We may retain information for longer than Our usual retention periods where necessary to comply with a legal obligation, respond to a dispute or investigation, preserve evidence or establish, exercise or defend legal claims.

8 Legal Bases for Processing

Data-protection law requires Us to identify an appropriate lawful basis for each purpose for which We process Personal Information.

The applicable basis depends on the information, feature and purpose involved. The main bases We may rely on are described below.

8.1 Performance of a Contract

We may process Personal Information where necessary to perform Our contract with you, including to create and manage your Account and provide the profiles, Content, messaging, trip-planning, search, map, AI and support features you request.

We rely on this basis only where the Processing is objectively necessary to provide the relevant contractual service.

Where necessary information is not provided, We may be unable to create your Account, provide the requested feature or perform the relevant part of Our contract with you.

8.2 Legitimate Interests

We may process Personal Information for legitimate interests such as operating and securing the Services, preventing fraud and misuse, moderating Content, improving features and performance, supporting Users, measuring referrals, maintaining business records and protecting legal rights, provided your interests and rights do not override those interests.

Before relying on legitimate interests, We assess the purpose, necessity and proportionality of the Processing and balance Our interests against your rights and freedoms.

You may have the right to object to processing based on legitimate interests, as explained in Chapter 15.

8.3 Consent

We may rely on consent for non-essential cookies or similar technologies, certain marketing, and other optional Processing where We clearly ask you to make a voluntary and informed choice.

Where We rely on consent, you may refuse to provide it without being denied unrelated parts of the Services.

You may withdraw your consent at any time using the relevant settings, controls or contact details provided by Gridded. Withdrawing consent will not affect the lawfulness of processing carried out before consent was withdrawn, but it may prevent Us from continuing to provide the feature that depended on it.

A device permission, such as permission to access your camera, photographs, microphone or location, controls whether the operating system allows technical access. Granting that permission does not necessarily mean that consent is the lawful basis for every related processing activity. We will identify the appropriate lawful basis according to the particular purpose involved.

8.4 Legal Obligations

We may process Personal Information where necessary to comply with legal obligations, including binding legal requests, tax or accounting requirements, data-protection requests, regulatory duties and breach-recording obligations.

Where We receive a request for Personal Information, We may take reasonable steps to verify the request and determine whether disclosure is legally required.

8.5 Vital Interests

In rare circumstances, We may process Personal Information where this is necessary to protect your life or the life of another person.

This basis may apply, for example, where We receive information indicating an immediate and serious threat to someone's life and processing or sharing limited information is necessary to assist emergency services or another appropriate organisation.

We expect to rely on this basis only in exceptional circumstances where the situation involves a genuine threat to life and no more appropriate lawful basis is available.

8.6 Special Category and Criminal-Offence Information

Where We intentionally process special category information, We will identify both an Article 6 lawful basis and an additional condition permitting that Processing.

Additional requirements may apply to information concerning alleged or confirmed criminal activity, including information processed through reports, moderation or safety investigations.

*UK law now also includes a separate basis called **recognised legitimate interest**, covering limited specified purposes such as crime prevention and safeguarding. I would not add it to Gridded's Policy unless Gridded actually decides to rely on one of those statutory conditions; if it does, the specific condition should be identified.*

9 Sharing Your Information

Gridded may share Personal Information to provide social and technical features, work with service providers and Booking Partners, protect the Services, comply with law or manage a business transaction.

The information shared and the recipient depend on the feature used and the circumstances.

We seek to share only the Personal Information reasonably necessary for the relevant purpose.

9.1 Public Profile Information

Certain information included on your profile may be visible to other Users or the public, depending on your profile visibility, the feature involved and the settings available through the Services.

This may include:

- your display name and username;
- profile photograph;
- biography;
- broad profile location, such as a city, region or country;
- travel interests or categories you choose to display;
- Stamps, achievements or other profile activity;
- posts and other User Content shared from your Account;
- follower and following information; and
- other information you choose to make visible through your profile.

Your profile location is intended to identify only a broad geographic area and is separate from your precise device location or any more specific location attached to a Story or post.

Where privacy controls are available, you may use them to manage who can view your profile or particular information. However, some limited information, such as your username and profile photograph, may remain visible where necessary to identify you within interactions such as comments, messages or reports.

Information made available to other Users may be copied, saved, screenshotted or shared outside the Services. Gridded cannot control information after another person has copied or shared it.

You should avoid adding information to your public profile that you do not want others to see, including your exact home address, private contact details, identification documents or other sensitive information.

9.2 Content Shared with Other Users

When you publish, send or otherwise share User Content, We make that Content available to the audience you select or to the Users for whom the relevant feature is intended.

This may include:

- posts, photographs and videos;
- Stories;
- captions, comments, replies and reactions;
- destination, activity and location tags;
- profile information displayed alongside Content;
- messages and attachments sent to other Users;
- shared trips, itineraries or collections, where sharing features are available; and
- other information that you choose to publish or send through the Services.

The audience for User Content may depend on your profile visibility, Content settings, Story audience, messaging recipients and the design of the relevant feature.

A location attached to a Story or other User Content may identify a specific venue, accommodation, landmark or other precise place. It may therefore reveal your current or recent whereabouts, activities or travel plans to the people who can view the Content.

Messages are shared with the participants in the relevant conversation and are not treated as public Content. However, recipients may copy, screenshot, save or forward messages outside the Services.

Where you tag, mention, photograph or otherwise include another person in User Content, information about that person may also be shared with the audience for the Content. You should ensure that you are entitled to share that information and consider the privacy of others before posting it.

Deleting Content may remove it from active display within the Services, but it may not remove copies previously saved or shared by other Users. Limited copies may also remain temporarily within backups, moderation records, security records or legal records as described in Chapter 13.

9.3 Service Providers

We may share Personal Information with providers supporting hosting, storage, authentication, maps, AI, analytics, communications, media processing, security, customer support, affiliate measurement and professional services.

The information shared depends on the service and may include Account information, User Content, selected media or frames, location, usage, technical or support information needed to perform the relevant function.

Where a service provider processes Personal Information on Our behalf as a processor, it must be subject to an appropriate written agreement and may process the information only for the agreed purposes and in accordance with Our documented instructions, subject to its own legal obligations.

Some Third-Party Services may instead act as independent controllers where they determine their own purposes and methods of processing. Their own privacy policies will apply to that independent processing.

Further information about the categories of Third-Party Services used by Gridded is provided in Chapter 10. Information about transfers outside the United Kingdom or European Economic Area is provided in Chapter 12.

9.4 Booking Partners

When you select a travel option, We may share limited referral and technical information with the relevant Booking Partner or affiliate network. The partner may return limited conversion, booking-value, transaction-status or commission information.

Gridded does not currently process payments or complete travel bookings directly. We do not ordinarily receive full payment-card details, passport information or all information you provide to a Booking Partner.

Booking Partners operate independently and generally determine how information submitted to their services is processed. Their own terms and privacy policies will apply when you access their websites, applications, booking systems or embedded services.

Accessing a Booking Partner through an in-app browser, webview or affiliate link may allow that partner and its technology providers to collect technical, cookie or similar tracking information. Further information about cookies, affiliate tracking and similar technologies is provided in Chapter 11.

9.5 Legal Requirements

We may disclose Personal Information to courts, law-enforcement bodies, regulators, emergency services, professional advisers or other appropriate recipients where necessary and permitted or required by law, including for legal claims, fraud or safety matters.

Where appropriate, We take reasonable steps to verify that a request is lawful and sufficiently specific and to limit disclosure to what is necessary and proportionate.

We may be unable to notify you about a disclosure where notification is prohibited by law, would interfere with an investigation or would create a risk to another person.

9.6 Business Transfers

Personal Information may be disclosed or transferred in connection with a proposed or completed merger, acquisition, financing, reorganisation, asset sale, insolvency or other change in ownership or control.

Information may be shared with prospective purchasers, investors and advisers for due diligence, subject to appropriate confidentiality and data-protection safeguards.

Any transfer of Personal Information will be subject to applicable data-protection law and appropriate safeguards. The recipient may continue processing the information for the purposes described in this Privacy Policy, unless you are provided with updated privacy information explaining a material change.

Where required, We will inform Users of a change in the organisation responsible for their Personal Information or a material change to the purposes for which it is processed.

One item to confirm before launch is whether users can make profiles private and whether Stories have selectable audiences. Sections 9.1 and 9.2 should match the controls actually available in the production app.

10 Third-Party Services

Gridded uses Third-Party Services to provide and support features including authentication, maps, AI, analytics, bookings, communications and media integrations.

Depending on the integration, a provider may process Personal Information on Our behalf, receive information from Us or collect information directly when you use its service.

Some providers act as processors under Our instructions, while others act as independent Controllers under their own privacy policies.

10.1 Mapping Providers

We currently intend to use Mapbox for maps and routing and Google Places for place search and destination information. Depending on the feature, these providers may receive searches, selected locations, route points, device location where permitted, IP address and technical identifiers.

Granting location permission does not automatically make your location public. Information becomes visible to other Users only where you choose to attach or confirm it through a profile, Story, post or other shared feature.

Further information about location processing is provided in Chapter 5.

10.2 Authentication Providers

You may be able to sign in using Apple or Google. We may receive your name, email address, provider-specific identifier, profile image where authorised, and authentication tokens or confirmation. Gridded may use Firebase Authentication to manage Account identifiers and login sessions.

We do not receive your Apple Account or Google Account password when you use these sign-in methods.

The authentication provider may independently process information about your use of its sign-in service under its own privacy policy.

10.3 Artificial Intelligence Providers

Gridded currently intends to use Google Gemini for selected photo and video-frame analysis, destination recognition, place suggestions and itinerary generation. The information sent may include selected media, visible text, prompts, location context, relevant metadata and generated outputs.

Only media that you select or otherwise choose to submit through an AI Feature will be sent for AI processing. Granting photo and video library permission does not permit Gridded to submit your entire library for analysis.

Information submitted to an AI provider may be processed or retained in accordance with the service configuration and contractual terms used by Gridded. Google's Gemini API currently distinguishes between standard abuse-monitoring retention and configurations that may qualify for zero data retention, so the production configuration must be confirmed and accurately described before launch.

Gridded does not configure its AI Features to identify people through facial recognition or biometric identification.

Further information about the information submitted, the purposes of processing and the limitations of AI-generated results is provided in Chapter 6.

10.4 Analytics Providers

Gridded may use analytics, diagnostics and performance providers, including Google Analytics for Firebase or Firebase Crashlytics where included at launch, to process usage, device, session, diagnostic, crash and performance information.

Where consent is required for a non-essential analytics SDK, cookie or similar technology, We will request consent before enabling the relevant processing and provide appropriate controls.

Further information about analytics is provided in Section 7.6, and information about cookies and similar technologies is provided in Chapter 11.

10.5 Booking Partners

Booking Partners available at launch may include GetYourGuide, Viator, Booking.com, Hostelworld, Skyscanner or other displayed providers. They may receive the selected listing or destination, referral identifiers, referral time and limited device or session information, and may return limited conversion or commission information.

Information that you enter directly into the Booking Partner's service—including payment details, passenger information, passport details or booking preferences—is normally collected directly by that Booking Partner rather than by Gridded.

Booking Partners operate independently and determine how they process information submitted through their services. Their own privacy policies and terms will apply, including where their website is displayed within Gridded through an in-app browser or webview.

Cookies, tracking technologies or affiliate identifiers may be used in connection with these referrals, as explained in Chapter 11.

10.6 Media and Social Integrations

Gridded may use GIPHY for GIF and sticker search and may use device sharing functions or other media integrations. Relevant providers may receive search terms, selected media and limited technical or interaction information.

Where you use your device's sharing function to send Gridded Content to another application, the selected Content will be passed to the application you choose. That application may then process the Content and related information under its own privacy policy.

Gridded does not control how another User or external platform uses Content once it has been shared outside the Services.

Before launch, keep only the named services that are genuinely integrated into the production app. Providers that are merely planned should not be presented as currently receiving Personal Information.

11 Cookies and Similar Technologies

Gridded may use cookies, software development kits, local storage, pixels, identifiers, referral parameters and similar technologies through the app, website, in-app browsers and Third-Party Services.

Cookies and similar technologies may be operated by Gridded or by Third-Party Services integrated into the Services. They may be used to provide essential functionality, remember preferences, understand how the Services are used, monitor technical performance and measure referrals to Booking Partners.

Where required, We will provide clear information and obtain your consent before using non-essential cookies or similar technologies. Technologies that require consent will not be activated before you make an affirmative choice unless an applicable legal exception permits their use.

The cookie notice or preference controls made available through the Services may provide further information about the particular technologies used, their providers, purposes and duration.

11.1 Essential Cookies

Essential technologies may be used to authenticate Users, maintain sessions, secure Accounts, prevent fraud, remember privacy choices and provide requested core functionality.

Where a technology is strictly necessary to provide a service you have requested, We may use it without obtaining prior consent. We will not use a technology for unrelated analytics, advertising or tracking purposes merely because it also performs an essential function.

Essential technologies cannot generally be disabled through Our cookie-preference controls. You may be able to block or remove them through your browser or device settings, but doing so may prevent parts of the Services from operating correctly.

11.2 Functional Cookies

Functional technologies may remember choices such as language, region, accessibility, map, notification and customisation preferences.

Some functional technologies may be used without consent where an applicable exception permits this, such as where they are required to remember a choice you specifically requested. Where no exception applies, We will request consent before activating them.

Declining optional functional technologies may mean that certain preferences are not remembered or that some enhanced features are less convenient, but it should not prevent access to unrelated core features.

11.3 Analytics and Performance Technologies

Analytics and performance technologies may collect usage, device, session, regional, crash and diagnostic information to measure use, identify technical problems and improve reliability and design.

Where required, We will obtain consent before using analytics technologies and provide relevant controls.

Further information about analytics processing is provided in Sections 7.6 and 10.4.

11.4 Affiliate Tracking

Affiliate tracking may use referral identifiers, campaign parameters, cookies, local storage, SDKs or session identifiers to connect a visit to a Booking Partner with a booking or conversion, verify commission and prevent invalid referrals.

Information processed may include the Booking Partner or link selected, the date and time of the referral, technical or session information, referral identifiers and limited conversion or booking-value information provided by the relevant partner.

Gridded does not ordinarily receive full payment-card information, passport details or all information entered when you complete a booking directly with a Booking Partner.

Where required, We will obtain consent before using storage or access technologies for affiliate measurement.

When you leave Gridded and access a Booking Partner's website, application or booking service, that partner may use its own cookies or similar technologies. Its own privacy and cookie information will apply to those activities.

11.5 Managing Cookies

Where Gridded uses non-essential cookies or similar technologies requiring consent, We will provide appropriate controls through the Services.

You may be able to accept or reject optional technologies, make choices by purpose, review or change preferences and withdraw consent.

It must be as easy to refuse or withdraw consent as it is to provide it. Simply continuing to use the Services will not be treated as consent to non-exempt technologies.

You may also be able to manage cookies or related technologies through your browser, device or operating-system settings. Blocking or deleting technologies through those settings may affect saved preferences, login sessions or particular features.

Essential technologies will remain active where they are required to provide functionality you request or to protect the Services. Refusing optional technologies will not prevent you from accessing unrelated core functionality.

Any withdrawal or change will apply to future use of the relevant technologies and will not affect processing that lawfully occurred before your preferences changed.

Third-Party Services, including Booking Partners, may provide separate controls for technologies used within their own websites, applications or services.

Before launch, Gridded should complete a technology audit and ensure its consent controls identify the actual technologies and third parties used, their purposes and how long information is stored or accessed. UK transparency requirements specifically cover those details.

12 International Data Transfers

Gridded is based in the United Kingdom, but some providers may process, store or access Personal Information in other countries, including outside the UK or European Economic Area.

The data-protection laws of the receiving country may differ from those that apply in the United Kingdom or European Economic Area. Where international-transfer restrictions apply, We will take steps to ensure that the transfer is lawful and that appropriate protection is provided.

12.1 International Transfers

International transfers may arise through providers supporting hosting, storage, authentication, AI, maps, analytics, communications, security, support, affiliate tracking and Booking Partner integrations. The information transferred depends on the service used.

We will not transfer Personal Information internationally unless an appropriate transfer mechanism, safeguard or lawful exception is available.

12.2 Safeguards

Where transfer restrictions apply, We may rely on adequacy regulations or decisions, the UK International Data Transfer Agreement, the UK Addendum, European Commission Standard Contractual Clauses, binding corporate rules or another lawful transfer mechanism.

Where required, We assess transfer risks and may use additional contractual, organisational or technical measures, such as access controls, data minimisation, encryption and restrictions on further transfers.

You may contact Us using the details in Chapter 18 to request further information about an international transfer or the safeguards used.

Before launch, this Chapter should be checked against Gridded's final providers, subprocessors, hosting locations and contractual transfer mechanisms so that the published Policy describes the transfers actually taking place.

13 Data Retention

We retain Personal Information only for as long as reasonably necessary to provide the Services, maintain security, comply with law and establish, exercise or defend legal claims.

When Personal Information is no longer required, We will take appropriate steps to delete it, anonymise it so that it can no longer identify you, or restrict its use where immediate deletion is not reasonably possible.

13.1 How Long We Keep Information

Retention periods depend on the purpose, Account status, sensitivity and risk of the information, legal requirements, potential claims and whether the information can instead be anonymised.

Depending on the circumstances, We may retain information as follows:

- **Account and profile information:** generally while your Account remains active and for a limited period after it is closed where necessary to complete the deletion process or meet legal or security requirements;
- **User Content:** generally until you delete the Content, close your Account or the Content is removed by Gridded, subject to the exceptions described below;
- **messages and communications between Users:** for as long as reasonably necessary to provide the messaging feature, maintain conversation records and address safety, moderation or legal concerns;
- **saved trips, itineraries and collections:** while they remain stored within your Account or until you delete them or close your Account;
- **search and usage information:** for the period necessary to provide recent-history features, personalise the Services, conduct analytics and improve performance;
- **location information:** for as long as required to provide the relevant map, route, profile, Story, Content or itinerary feature;
- **support communications:** for as long as necessary to resolve the enquiry, maintain an appropriate support record and address any related complaint or claim;
- **moderation, safety and security information:** for as long as reasonably necessary to investigate incidents, enforce Our policies, prevent repeated misuse and protect Users and the Services;
- **analytics and diagnostic information:** in accordance with Our retention settings and the arrangements applying to the relevant analytics or performance provider;
- **affiliate and referral information:** for as long as necessary to verify referrals, calculate commissions, maintain financial records and resolve disputes; and
- **privacy choices and requests:** for as long as reasonably necessary to record your preferences, demonstrate compliance and respond to related enquiries.

We review retention periods as the Services, legal obligations and Processing activities change.

Information that has been irreversibly anonymised so that it can no longer identify you may be retained and used for research, analytics, statistics and improvement of the Services.

13.2 Account Deletion

You may request deletion of your Account through the settings or account-deletion process made available within the Services, or by contacting Us using the details provided in Chapter 18.

We may take reasonable steps to verify that the request has been made by the Account holder before processing the deletion.

After a confirmed Account-deletion request, We will close the Account, remove the profile and associated Content from active display, and delete or anonymise information that is no longer required.

Account deletion may not result in the immediate deletion of every copy of your information. In particular:

- information may remain temporarily within backups until it is overwritten or deleted through Our normal backup cycle;
- references to you contained within User Content created by another User, including @mentions or username tags in captions, comments or posts, may remain after you delete your Account because they form part of that User's Content. The displayed username may remain until the User who created the Content edits or deletes it, although the mention may no longer link to an active Account;
- messages, comments or other information previously shared with other Users may remain within their conversations or interactions where necessary to preserve those records;
- Content copied, saved, screenshotted or shared outside the Services by another person will remain outside Our control;
- limited safety, moderation, security, transaction or legal records may be retained where We have a lawful reason to do so; and
- aggregated or irreversibly anonymised information may continue to be retained.

Information remaining temporarily in backups will not ordinarily be restored to active use and will be deleted or overwritten through the applicable backup cycle.

You may contact Us if you believe that a remaining mention or reference infringes your rights, breaches Our Community Guidelines or creates a privacy or safety concern.

Deleting your Gridded Account does not automatically delete information held independently by Booking Partners or other Third-Party Services. You must contact the relevant provider or use its available controls if you wish to request deletion of information it controls.

The right to deletion is not absolute. In some circumstances, We may be permitted or required to retain particular information, as explained in Section 13.3 and Chapter 15.

13.3 Legal Retention Requirements

We may retain limited information where necessary for legal, regulatory, tax, accounting, reporting, dispute, claim, safety, security, fraud-prevention or compliance purposes.

Where information is retained for one of these purposes, We will seek to limit the information retained, restrict access to authorised persons and avoid using it for unrelated purposes.

When the relevant legal, security or operational reason for retention ends, We will delete or anonymise the information in accordance with Our retention procedures. Personal Information should not be kept indefinitely merely because it could potentially be useful in the future.

Before publication, Gridded should create an internal retention schedule containing the actual periods applied to each data category. The Policy can then include specific periods where practical, rather than relying entirely on general retention criteria.

14 Security

Gridded uses appropriate technical and organisational measures designed to protect Personal Information against unauthorised or unlawful Processing and accidental loss, destruction, alteration, disclosure or access.

The measures We use will depend on factors such as the nature and sensitivity of the information, the way it is processed, the risks involved, the technologies available and the cost of implementation.

However, no application, online service, transmission method or storage system can be guaranteed to be completely secure. You should therefore take appropriate steps to protect your Account and information when using the Services.

14.1 Protecting Your Information

Depending on the systems and risks involved, measures may include encryption in transit, access controls, secure development and updates, monitoring, backups, retention controls, incident logging and contractual security requirements for providers.

Access to Personal Information will be limited to members of Our personnel, contractors and service providers who reasonably require it for their role or the service they provide. Where appropriate, those persons will be subject to confidentiality and security obligations.

We assess the security arrangements of service providers according to the nature of the service and the information involved. However, Third-Party Services operate their own systems and may also process information in accordance with their own security practices.

14.2 Your Responsibilities

You should protect your sign-in details and connected email or authentication accounts, secure and update your device, be cautious of suspicious links or requests, and tell Us promptly if you believe your Account has been compromised.

We will not ask you to provide your password through an unsolicited email, message or telephone call.

If you believe that someone has accessed your Account without permission, that your sign-in credentials have been compromised or that you have identified a security vulnerability affecting the Services, please contact Us using the details provided in Chapter 18.

14.3 Data Breaches

A Personal Information breach may involve the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of or access to Personal Information.

If We become aware of a suspected Personal Information breach, We will investigate, contain it where possible, assess the risks, take appropriate remedial action, keep required records and work with providers, advisers or authorities where appropriate.

Where a Personal Information breach is likely to result in a risk to individuals' rights and freedoms, We will notify the Information Commissioner's Office or another applicable supervisory authority without undue delay and, where feasible, within 72 hours of becoming aware of it, as required by applicable law. Not every breach is required to be reported, but Gridded must assess the risk and document its decision.

Where a breach is likely to result in a high risk to you, We will notify you without undue delay unless an applicable exception applies, and provide information about the incident, likely effects, protective measures and how to contact Us.

Before publication, the security measures listed in Section 14.1 should be checked against Gridded's actual production systems. In particular, avoid making an unconditional promise about

encryption at rest, formal vulnerability testing or monitoring unless those controls are genuinely implemented.

15 Your Rights

Depending on the law that applies, you may have rights to be informed, access and correct your information, request deletion or restriction, object to Processing, receive eligible information in a portable format, withdraw consent, challenge certain automated decisions and complain.

These rights are not absolute and may apply only in particular circumstances. We may be permitted or required to refuse or limit a request where an applicable legal exception applies.

You can exercise your rights through any privacy tools made available within the Services or by contacting Us using the details provided in Chapter 18.

We may ask for information reasonably necessary to verify your identity, protect your Account, understand the request and locate the relevant information.

We will respond to valid rights requests without undue delay and generally within one calendar month. Where permitted by law, this period may be extended by up to two additional months where a request is complex or multiple requests have been made. We will inform you where an extension applies.

Rights requests are generally handled without charge. However, where permitted by law, We may charge a reasonable fee or refuse to act where a request is manifestly unfounded or excessive, including because it is repetitive.

15.1 UK GDPR Rights

Where the UK GDPR and Data Protection Act 2018 apply, the rights described in Sections 15.3 to 15.10 may be available to you.

15.2 EU GDPR Rights

Where the EU GDPR applies, you generally have equivalent rights under EU data-protection law.

15.3 Access Your Data

You may request confirmation of whether We process Personal Information about you, a copy of that information and the supplementary information required by applicable law.

We will ordinarily provide a copy of the Personal Information within the scope of your request. We may redact or withhold information where reasonably necessary to protect the rights and privacy of another person or where an applicable legal exception permits or requires Us to do so.

A request for access may be made verbally or in writing and does not need to refer expressly to the UK GDPR or be presented on a particular form.

15.4 Correct Your Data

You may ask Us to correct Personal Information that is inaccurate or to complete information that is incomplete.

You may be able to correct certain information directly through your Account or profile settings. For information that cannot be changed through the Services, you may contact Us using the details provided in Chapter 18.

We may ask for information supporting a correction, review the source and context, restrict disputed information while it is checked, and notify relevant recipients where required and reasonably possible.

The right to rectification does not necessarily require Us to alter an accurate record merely because you disagree with an opinion, moderation decision or historical event recorded within it. However, We will consider whether the record is factually accurate, complete and presented fairly.

15.5 Delete Your Data

You may request deletion where information is no longer necessary, consent has been withdrawn and no other basis applies, a valid objection has been made, the Processing was unlawful or deletion is legally required.

The right is not absolute. We may retain information where required or permitted for legal obligations, claims, freedom of expression, safety, security, fraud prevention or the rights of others.

Deleting your Account or particular Content may not immediately remove every copy of your information from backups, messages received by other Users, moderation records or information independently held by Third-Party Services. Further information is provided in Sections 13.2 and 13.3.

The right to erasure applies only in particular circumstances and does not create an unrestricted right to require deletion of all information.

15.6 Restrict or Object to Processing

Restricting Processing

You may request restriction while accuracy is checked, where Processing is unlawful but you prefer restriction, where information is needed for a legal claim, or while We assess an objection.

Where Processing is restricted, We may continue storing the information but will generally not use it for other purposes unless you consent, it is needed for legal claims, it is required to protect another person's rights or another legal basis permits the Processing.

Objecting to Processing

You may object to Processing based on Our legitimate interests where your particular circumstances mean that you believe the Processing should stop.

Where a valid objection is made, We will stop the relevant Processing unless We can demonstrate compelling legitimate grounds that override your interests, rights and freedoms or the Processing is required to establish, exercise or defend legal claims.

You have an absolute right to object at any time to the use of your Personal Information for direct marketing, including related profiling. If you object, We will stop using your information for that

purpose. We may retain limited information on a suppression list to ensure that your preference continues to be respected.

15.7 Data Portability

In certain circumstances, you may request Personal Information you provided to Us in a structured, commonly used and machine-readable format where Processing is automated and based on consent or contract.

Where technically feasible and legally permitted, you may ask Us to transmit that information directly to another organisation.

The right to portability does not generally apply to information created or inferred by Gridded, such as internal assessments, moderation conclusions or profiles generated through Our own analysis. It also does not require Us to adopt systems that are technically incompatible with another provider.

15.8 Withdraw Consent

Where We rely on your consent to process Personal Information, you may withdraw that consent at any time.

You may withdraw consent through relevant settings, cookie controls, unsubscribe tools, device permissions or by contacting Us.

Withdrawing consent will not affect the lawfulness of Processing carried out before consent was withdrawn.

Where information or device access is necessary for an optional feature, withdrawing consent or permission may prevent that feature from operating. It will not prevent you from using unrelated parts of the Services.

A device permission and data-protection consent are related but distinct. Changing a device permission prevents or limits technical access, while withdrawal of consent applies where consent is the lawful basis for the relevant Processing.

15.9 Lodge a Complaint

You have the right to complain if you believe that Gridded has not handled your Personal Information in accordance with applicable data-protection law.

You may submit a privacy complaint using the contact details or electronic complaint process identified in Chapter 18. Please provide enough information for Us to understand and investigate the matter.

For complaints under UK data-protection law, We will provide a clear submission method, acknowledge the complaint within 30 days, investigate appropriately, keep you reasonably informed and communicate the outcome without undue delay.

You may also complain to the **Information Commissioner's Office**, which is the United Kingdom's data-protection supervisory authority.

Where the EU GDPR applies, you may lodge a complaint with the relevant EEA data-protection authority, particularly in the country of your habitual residence, place of work or the place of the alleged infringement.

We would appreciate the opportunity to investigate and address your concerns directly, but contacting Us first does not remove or limit your right to approach an applicable supervisory authority.

15.10 Automated Decision-Making

Gridded may use automated systems to personalise Content, recommend destinations, assist with moderation and provide AI-generated travel suggestions.

Gridded does not currently use solely automated Processing to make decisions about you that produce legal or similarly significant effects.

If We introduce significant solely automated decision-making, We will provide the information and safeguards required by applicable law, which may include an opportunity to challenge the decision and request human intervention.

16 Children's Privacy

The Services are intended only for individuals aged 18 or over. Gridded does not permit under-18s to create an Account or use the Services and does not knowingly process their Personal Information to provide the Services.

We may process limited age-related information to confirm eligibility, operate proportionate age-assurance measures, investigate underage use, protect safety, enforce Our policies or comply with law.

If We become aware that an individual under 18 has created an Account or provided Personal Information through the Services, We may suspend or terminate the Account and take reasonable steps to delete or anonymise the associated Personal Information.

Limited information may be retained where necessary to enforce the age restriction, prevent repeated attempts, investigate misuse, respond to a complaint or claim, or comply with law.

If you believe that an individual under the age of 18 has created an Account or provided Personal Information through the Services, please contact Us using the details provided in Chapter 18.

An important point for launch: describing Gridded as 18+ does not automatically take it outside the ICO's Children's Code. The Code may still apply where the service is likely to be accessed by children, even if they are not its intended audience. Gridded should therefore document its assessment and use effective, proportionate measures to enforce its age restriction.

17 Changes to This Privacy Policy

We may update this Privacy Policy from time to time to ensure that it accurately reflects how We collect and use Personal Information, changes to the Services and developments in applicable law or regulatory guidance.

When We update this Privacy Policy, We will revise the **"Last Updated"** or **"Effective Date"** shown at the beginning of the Policy.

17.1 Updates

We may update this Privacy Policy when features, data categories, Processing purposes, providers, security, retention, international transfers, law or guidance change, or to clarify or correct the Policy.

The updated Privacy Policy will be made available through the Services and, where applicable, on Our website.

Unless otherwise stated, changes will apply from the effective date shown in the updated Policy. We will not ordinarily apply a new purpose for Processing retrospectively to Personal Information already collected where doing so would be incompatible with the purpose for which it was originally obtained.

Before using Personal Information for a new purpose where required, We will provide relevant privacy information, identify an appropriate lawful basis and obtain consent where consent is required.

Previous versions of this Privacy Policy may be retained for Our compliance records and may be made available on request where reasonably appropriate.

17.2 Notification of Material Changes

Where We make a material change to this Privacy Policy or to the way We process Personal Information, We will take reasonable steps to bring the change to your attention.

Material changes may include significant new data categories or purposes, new recipient categories, significant automated decision-making, substantial retention or transfer changes, a new Controller, or meaningful changes to your rights and choices.

Depending on the change, We may notify you through an in-app notice, email, website notice, Account notification or another appropriately prominent method.

Where reasonably practicable, notice of a material change will be provided before the change takes effect so that you have an opportunity to review it and, where relevant, adjust your settings or exercise your rights.

Continued use of the Services will not be treated as consent to Processing where data-protection law requires specific consent. In those circumstances, We will request consent separately through an appropriate affirmative choice.

You should keep the contact information associated with your Account accurate so that We can provide important privacy notices where necessary. Privacy information must remain clear, accessible and transparent, and layered notices or prominent in-app information may be used to draw attention to important processing details.

18 Contact Us

If you have questions, concerns or complaints about this Privacy Policy or the way We collect, use, share, retain or protect Personal Information, you may contact Us using the details below.

Legal entity: [full legal company name]

Registered office: [registered office address]

Privacy email: [privacy email address]

Online privacy or complaint form: [link, where available]

Please do not send passwords, payment-card details, passport information or other unnecessary sensitive information when contacting Us.

18.1 Privacy Enquiries

You may contact Us about this Privacy Policy, data We collect or use, settings and permissions, cookies and analytics, location and AI Processing, Third-Party Services, security, retention or any other privacy concern.

To help Us understand and respond to your enquiry, please provide a clear description of the issue and any relevant information, such as the email address or username associated with your Account. You should provide only the information reasonably necessary for Us to address the matter.

If your enquiry is a data-protection complaint, We will acknowledge it within 30 days, investigate appropriately, keep you reasonably informed and communicate the outcome without undue delay.

18.2 Data Protection Requests

You may contact Us to exercise an available right, including access, correction, deletion, restriction, objection, portability, withdrawal of consent, objection to direct marketing or safeguards relating to eligible automated decisions.

Where available, you may also exercise certain rights directly through your Account settings, including updating profile information, deleting Content, changing permissions or requesting Account deletion.

When submitting a request, please explain which right you wish to exercise and provide enough information for Us to identify the relevant Account and Personal Information.

We may request additional information where reasonably necessary to confirm your identity and protect Personal Information from unauthorised access or deletion. We will not request more information than is reasonably necessary for that purpose.

Where someone submits a request on your behalf, We may ask for evidence that they are authorised to act for you and may also take reasonable steps to verify your identity.

We will respond to valid requests within the periods required by applicable law. Further information about your rights and how We handle requests is provided in Chapter 15.

18.3 Regulatory Complaints

You have the right to complain to an applicable data-protection supervisory authority if you believe that Our Processing of your Personal Information does not comply with data-protection law.

In the United Kingdom, the relevant supervisory authority is the **Information Commissioner's Office**:

Information Commissioner's Office

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Telephone: 0303 123 1113

You can also submit a complaint through the Information Commissioner's Office's website.

Where the EU GDPR applies, you may lodge a complaint with the data-protection authority in the EEA country where you ordinarily live or work, or where you believe an infringement took place.

We would appreciate the opportunity to investigate and address your concerns directly, but you are not required to contact Us before approaching a supervisory authority where applicable law permits you to complain directly.

Before publication

*Use a dedicated address such as **privacy@gridded.com** and provide an electronic method for submitting data-protection complaints. Do not describe anyone as Gridded's **Data Protection Officer** unless you formally appoint a DPO; "privacy contact" or "data-protection contact" is sufficient otherwise.*

If Gridded actively offers the Services to people in the EEA and Article 27 of the EU GDPR requires an EU representative, the representative's name and contact details should also be added to this chapter.