

Kuberno Limited Privacy Policy

We are Kuberno Limited. We're a company registered in England and Wales with company number 12391985, whose registered address is at 3rd Floor, 86-90 Paul Street, London, EC2A 4NE. In this privacy notice, we will refer to ourselves as 'we', 'us' or 'our'. We are the Data Controller of the personal information we collect, hold and use about you, as explained in this notice.

You can get hold of us in any of the following ways:

- by phoning us on 0204 571 3464;
- by emailing us at theteam@kuberno.com; or
- by writing to us at our registered address.

We take the privacy, including the security, of personal information we hold about you seriously. This privacy notice is designed to inform you about how we collect personal information about you and how we use that personal information. You should read this privacy notice carefully so that you know and can understand why and how we use the personal information we collect and hold about you.

We have appointed Zoe Bucknell as our data protection manager. You can contact them using the details set out above.

We may issue you with other privacy notices from time to time, including when we collect personal information from you. This privacy notice is intended to supplement these and does not override them.

We may update this privacy notice from time to time. This version was last updated on 26 May 2022.

1. Key definitions

1.1. The key terms that we use throughout this privacy notice are defined below, for ease:

Data Controller: under UK data protection law, this is the organisation or person responsible for deciding how personal information is collected and stored and how it is used.

Data Processor: a Data Controller may appoint another organisation or person to carry out certain tasks in relation to the personal information on behalf of, and on the written instructions of, the Data Controller. (This might be the hosting of a site containing personal data, for example, or providing an email-marketing service that facilitates mass distribution of marketing material to a Data Controller's customer base.)

Personal Information: in this privacy notice, we refer to your personal data as 'personal information'. 'Personal information' means any information from which a living individual can be identified. It does not apply to information that has been anonymized.

Special Information – certain very sensitive personal information requires extra protection under data protection law. Sensitive data includes information relating to health, racial and

ethnic origin, political opinions, religious and similar beliefs, trade union membership, sex life and sexual orientation and also includes genetic information and biometric information.

2. Details of personal information that we collect and hold about you

2.1. Set out below are the general categories and details of retention periods in relation to those categories (see section 8 below for more details about retention) and in each case the types of personal information that we collect, use and hold about you:

General Category	Types of Personal Data in that category	Retention Periods
Identity information	This is information relating to your identity such as your name (including any previous names and any titles that you use), gender, marital status and date of birth	12 months
Contact information	This is information relating to your contact details such as email address, addresses, telephone numbers	12 months
Account information	This is information relating to your account with us (including username and password)	12 months
Payment information	This is information relating to the methods by which you provide payment to us such as [bank account details, credit or debit card details] and details of any payments (including amounts and dates) that are made between us	12 months
Transaction information	This is information relating to transactions between us such as details of the goods, services and/or digital content provided to you and any returns details	12 months
Survey information	This is information that we have collected from you or that you have provided to us in respect of surveys and feedback	12 months
Marketing information	This is information relating to your marketing and communications preferences	12 months
Website, Device and Technical Information	This is information about your use of our website and technical data which we collect (including your IP address, the type of browser you are using and the version, the operating system you are using, details about the time zone and location settings on the device and other information we receive about your device)	12 months

2.2. The types of personal data we collect about you may differ from person to person, depending on who you are and the relationship between us.

3. Details of special information that we collect and hold about you

3.1. Special information is explained in section 1 above. We do not collect or hold any special information about you.

3.2. We do not collect information from you relating to criminal convictions or offences.

4. Details of how and why we use personal information

4.1. We are only able to use your personal information for certain legal reasons set out in data protection law. There are legal reasons under data protection law other than those listed below; but, in most cases, we will use your personal information for the following legal reasons:

- Contract Reason: this is in order to perform our obligations to you under a contract we have entered into with you;
- Legitimate Interests Reason: this is where the use of your personal information is necessary for our (or a third party's) legitimate interests, so long as that legitimate interest does not override your fundamental rights, freedoms or interests;
- Legal Obligation Reason: this is where we have to use your personal information in order to perform a legal obligation by which we are bound; and
- Consent Reason: this is where you have given us your consent to use your personal information for a specific reason or specific reasons.

4.2. So that we are able to provide you with services, we will need your personal information. If you do not provide us with the required personal information, we may be prevented from supplying the services to you.

4.3. It is important that you keep your personal information up to date. If any of your personal information changes, please contact us as soon as possible to let us know. If you do not do this, then we may be prevented from supplying the services to you.

4.4. Where we rely on consent for a specific purpose as the legal reason for processing your personal information, you have the right under data protection law to withdraw your consent at any time. If you do wish to withdraw your consent, please contact us using the details set out at the beginning of this notice. If we receive a request from you withdrawing your consent to a specific purpose, we will stop processing your personal information for that purpose, unless we have another legal reason for processing your personal information – in which case, we will confirm that reason to you.

4.5. We have explained below the different purposes for which we use your personal information and, in each case, the legal reason(s) allowing us to use your personal information. Please also note the following:

- if we use the Legitimate Interests Reason as the legal reason for which we can use your personal information, we have also explained what that legitimate interest is; and
- for some of the purposes, we may have listed more than one legal reason on which we can use your personal information, because the legal reason may be different in different circumstances. If you need confirmation of the specific legal reason that we are relying on to use your personal data for that purpose, please contact us using the contact details set out at the start of this privacy notice.

Purpose	Legal Reason(s) for using the personal information
To enrol you as a customer	Contract Reason, Legitimate Interests Reason (in order to offer you other goods, services and/or digital content which helps us to develop our business)
To process your order, which includes taking payment from you, advising you of any updates in relation to your order or any enforcement action against you to recover payment	Contract Reason, Legitimate Interests Reason (in order to recover money that you owe us)
To manage our contract with you and to notify you of any changes	Contract Reason, Legal Obligation Reason
To comply with audit and accounting matters	Legal Obligation Reason
For record keeping, including in relation to any guarantees or warranties provided as part of the sale of goods, services and/or digital content	Contract Reason, Legal Obligation Reason
To improve the goods, services, and/or digital content that we supply	Legitimate Interests Reason (in order to improve the goods, services, and/or digital content for future customers and to grow our business)
To recommend and send communications to you about goods, services, and/or digital content that you may be interested in. More details about marketing are set out in section 11 below	Legitimate Interests Reason (in order to grow our business), Consent Reason
To ensure the smooth running and correct operation of our website	Legitimate Interests Reason (to ensure our website runs correctly)
To understand how customers and visitors to our website use the website and interact with it via data analysis	Legitimate Interests Reason (to improve and grow our business, including our website, and to understand our customer's needs, desires and requirements)

4.6. Sometimes we may anonymise personal information so that you can no longer be identified from it and use this for our own purposes. In addition, sometimes we may use some of your personal information together with other people's personal information to give us statistical information for our own purposes. Because this is grouped together with other

personal information and you are not identifiable from that combined data we are able to use this.

4.7. Under data protection laws, we can only use your personal information for the purposes we have told you about, unless we consider that the new purpose is compatible with the purpose(s) we told you about. If we want to use your personal information for a different purpose that we do not think is compatible with the purpose(s) we told you about, then we will contact you to explain this and what legal reason is in place to allow us to do this.

5. Details of how we collect personal information and special information

5.1. We usually collect Identity Information, Contact Information, Payment Information, Transaction Information, Survey Information, Marketing Information, directly from you when you fill out a form, survey or questionnaire, purchase goods, services and/or digital content from us, contact us by email, telephone, in writing or otherwise. This includes the personal information that you provide to us when you subscribe to our mailing list, enter a competition or survey.

5.2. We may receive some of your personal information from third parties or publicly available sources. This includes:

- Identity Information and Contact Information from publicly available sources such as Companies House,
- Website, Device and Technical Information from third parties such as analytics providers (like Google Analytics)

5.3. We may also receive Website, Device and Technical Information automatically from technologies such as cookies that are installed on our website. To find out more about these please see our cookie policy, which is available here.

6. Details about who personal Information may be shared with

6.1. We may need to share your personal information with other organisations or people. These organisations include:

- Third parties who are not part of our group. These may include:
 - Suppliers: such as IT support services, payment providers, administration providers, marketing agencies who are based in the United Kingdom;
 - Government bodies and regulatory bodies: such as HMRC, fraud prevention agencies who are based in the United Kingdom;
 - Our advisors: such as lawyers, accountants, auditors, insurance companies who are based in the United Kingdom;
 - Our bankers who are based in the United Kingdom;
 - Credit Reference Agencies who are based in the United Kingdom;
 - Email platforms who are based in the United Kingdom;
- any organisations that propose to purchase our business and assets, in which case we may disclose your personal information to the potential purchaser.

6.2. Depending on the circumstances, the organisations or people who we share your personal information with will be acting as either Data Processors or Data Controllers. Where we share your personal information with a Data Processor, we will ensure that we

have in place contracts that set out the responsibilities and obligations of us and them, including in respect of security of personal information.

6.3. We do not sell or trade any of the personal information that you have provided to us.

7. Details about transfers to countries outside of the EEA

7.1. We do not transfer your personal information outside of the EEA.

8. Details about how long we will hold your personal information

8.1. We will only hold your personal data for as long as is necessary. How long is necessary will depend upon the purposes for which we collected the personal information (see section 4 above) and whether we are under any legal obligation to keep the personal information (such as in relation to accounting or auditing records or for tax reasons). We may also need to keep personal information in case of any legal claims, including in relation to any guarantees or warranties that we have provided with the services and digital content.

8.2. We have set out above the details of our retention periods for different types of data. You can find them in section 2.

9. Automated decision making

9.1. 'Automated decision making' is where a decision is automatically made without any human involvement. Under data protection laws, this includes profiling. 'Profiling' is the automated processing of personal data to evaluate or analyse certain personal aspects of a person (such as their behaviour, characteristics, interests and preferences).

9.2. Data protection laws place restrictions upon us if we carry out any automated decision making (including profiling) that produces a legal effect or similarly significant effect on you.

9.3. We do not carry out any automated decision making (including profiling) that produces a legal effect or similarly significant effect on you. If we do decide to do this then we will notify you and we will inform you of the legal reason we are able to do this.

10. Your rights under data protection law

10.1. Under data protection laws, you have certain rights in relation to your personal information, as follows:

- Right to request access: (this is often called 'subject access'). This is the right to obtain from us a copy of the personal information that we hold about you. We must also provide you with certain other information in response to these requests to help you understand how your personal information is being used.
- Right to correction: this is the right to request that any incorrect personal data is corrected and that any incomplete personal data is completed.
- Right to erasure: (this is often called the 'right to be forgotten'). This right only applies in certain circumstances. Where it does apply, you have the right to request us to erase all of your personal information.

- Right to restrict processing: this right only applies in certain circumstances. Where it does apply, you have the right to request us to restrict the processing of your personal information.
- Right to data portability: this right allows you to request us to transfer your personal information to someone else.
- Right to object: you have the right to object to us processing your personal information for direct marketing purposes. You also have the right to object to us processing personal information where our legal reason for doing so is the Legitimate Interests Reason (see section 4 above) and there is something about your particular situation that means that you want to object to us processing your personal information. In certain circumstances, you have the right to object to processing where such processing consists of profiling (including profiling for direct marketing).

10.2. In addition to the rights set out in section 10.1, where we rely on consent as the legal reason for using your personal information, you have the right to withdraw your consent. Further details about this are set out in section 4.5.

10.3. If you want to exercise any of the above rights in relation to your personal information, please contact us using the details set out at the beginning of this notice. If you do make a request, then please note:

- we may need certain information from you so that we can verify your identity;
- we do not charge a fee for exercising your rights unless your request is unfounded or excessive; and
- if your request is unfounded or excessive, then we may refuse to deal with your request.

11. Marketing

11.1. You may receive marketing from us about similar goods and services, where either you have consented to this, or we have another legal reason by which we can contact you for marketing purposes.

11.2. However, we will give you the opportunity to manage how or if we market to you. In any email that we send to you, we provide a link to either unsubscribe or opt out, or to change your marketing preferences. To change your marketing preferences, and/or to request that we stop processing your personal information for marketing purposes, you can always contact us on the details set out at the beginning of this notice.

11.3. If you do request that we stop marketing to you, this will not prevent us from sending communications to you that are not to do with marketing (for example in relation to services and digital content that you have purchased from us).

11.4. Digital Marketing Service Providers

We periodically appoint digital marketing agents to conduct marketing activity on our behalf, such activity may result in the compliant processing of personal information. Our appointed data processors include Prospect Global Ltd (trading as Sopro) Reg. UK Co. 09648733. You can contact Sopro and view their privacy policy here: <http://sopro.io>. Sopro are

registered with the ICO Reg: ZA346877 their Data Protection Officer can be emailed at: dpo@sopro.io

12. Complaints

12.1. If you are unhappy about the way that we have handled or used your personal information, you have the right to complain to the UK supervisory authority for data protection, which is the Information Commissioner's Office (ICO). Please do contact us in the first instance if you wish to raise any queries or make a complaint in respect of our handling or use of your personal information, so that we have the opportunity to discuss this with you and to take steps to resolve the position. You can contact us using the details set out at the beginning of this privacy notice.

13. Third-party websites

Our website may contain links to third-party websites. If you click and follow those links, then these will take you to the third-party website. Those third-party websites may collect personal information from you and you will need to check their privacy notices to understand how your personal information is collected and used by them.