

KUUL GROUP

Privacy policy

Updated 07th August, 2020

Introduction

At KuulGroup we are committed to building cleverly connected hospitality solutions. We are also committed to protecting the privacy of everyone in the KuulGroup community. This means that we'll protect the personal information of anyone that accesses our websites or services through any mobile application, platform or device (collectively, the "Services").

This privacy policy ("Privacy Policy") explains how KuulGroup and our subsidiaries and affiliates collect, share and use your personal information. You'll also find information about how you can exercise your privacy rights. By using our Services you agree to KuulGroup using your personal information as described in this Privacy Policy. The terms "we", "us" or "our" are each intended as reference to KuulGroup Plc and our subsidiaries and affiliates.

You can rest assured that KuulGroup is committed to treating your personal information responsibly, securely and transparently. If you have questions, please contact us using the contact details provided at the bottom of this Privacy Policy.

Summary

Information we collect from you and why

When you use our Services and navigate around our websites, we may collect the following information from you:

Information that you provide voluntarily

You may provide your full name, occupation, contact information, including email address, telephone number and any passwords you create. We will use this information to:

- authenticate your access to certain parts of our websites;
- send news alerts of corporate developments;
- periodically send promotional emails about new products, special offers or other information that we think you may find interesting;
- administer promotions, competitions or job applications that you enter via our website
- invite you to participate in market research surveys;
- improve and personalise our Services; and
- ensure internal record keeping is up-to-date.

Information that we collect automatically

We may collect your IP address, device ID, browsing history and information such as your postcode, preferences and interests including through our use of cookies, in order to;

- monitor accessibility and optimisation of our websites;
- improve and personalise our products and services; and
- maintain a record of your interaction with the Services (through cookies and other similar technologies).

For further information about the types of cookies, similar technologies we use, and why and how you can control these, please see our Cookie Policy.

Who we share personal information with

Depending on the circumstances, we may share your personal information with the following entities:

Companies within the KuulGroup group of companies (which means our subsidiaries and affiliates, our ultimate software development company and its subsidiaries and affiliates) - these companies act for us and process your personal information for the purposes set out in this Privacy Policy.

Any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person.

Third parties who undertake various activities to support our Services. This includes Acquirers, Payment Facilitators and Payment Gateways.

If any part of our business enters into a joint venture, purchases another business or is sold to or merged with another business entity, your information may be disclosed or transferred to the target company, or new business partners or owners or their agents and advisors. In these circumstances we will always inform the relevant entities that they must only use your personal information for the purposes disclosed in this Privacy Policy.

Any other person, provided that you have given your consent to the disclosure. We will not sell, distribute or lease your personal information unless we have your permission or are required by law to do so.

Legal basis for processing personal information

Our legal basis for collecting and using your personal information as described above will depend on the specific context in which we collect it.

However, we will normally collect personal information from you only where (i) we have your consent to do so, (ii) where we need the personal information to perform a contract with you, or (iii) where the processing is in our legitimate interests and not overridden by your rights. In some cases, we may have another legal basis such as a legal obligation to collect personal information from you.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your

personal information is mandatory or not (and we'll also explain the possible consequences of you not providing it).

Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we will make it clear to you at the relevant time what those legitimate interests are.

If you have questions about, or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the "How to contact us" heading below.

International data transfers

We may transfer your personal information to countries other than the country in which you are resident. KuulGroup's website servers are mainly located in the United Kingdom, however our group companies and third party service providers and partners operate in a number of countries, including Malta, Spain, South Africa and the United Kingdom. This means that when we collect your personal information we may process it in any of these countries.

Whilst these countries may have data protection laws that are different to the laws of your country, you can rest assured that KuulGroup takes care to implement appropriate safeguards to protect your personal information in those countries in accordance with this Privacy Policy. Some of the safeguards we may rely on include, where appropriate, using the European Commission's approved standard contractual clauses with our suppliers, intra-group transfer agreements (so that we can safely transfer your data between the KuulGroup group of companies all over the world) and contracting with Privacy Shield certified companies in the United States, where this is appropriate.

Security

We place great importance on keeping your personal information safe and secure. As such, we put in place appropriate technical and organisational measures / industry standard technology to protect it from unauthorised access and unlawful processing, accidental loss, destruction and damage.

The security measures we use are designed to provide a level of protection and security appropriate to the risk of processing your personal information. Where you have chosen a password which allows you to access certain parts of the Services, you are responsible for keeping this password confidential. We advise you not to share your password with anyone and to use a unique password for our Services. We will not be liable for any unauthorised transactions entered into using your name and password.

Data retention

KuulGroup will retain your personal information where we have an ongoing legitimate business need to do so (for example, while you hold an account with us or to enable us to meet our legal, tax or accounting obligations).

If you object to us processing certain categories of your personal information (including in relation to receiving marketing communications from us), we will retain a record of your objection to the processing of your information so that we can continue to respect your wishes.

We will destroy or permanently anonymise your personal information at the point that we no longer need to process it for our ongoing legitimate business needs or for any legal reason. If this is not possible (for

example, because your personal information has been stored in backup archives), then we will securely store it and isolate it from any further processing until deletion is possible.

Your data protection rights

KuulGroup respects your privacy and data protection rights. Below is a summary of your rights in respect of your personal information which KuulGroup handles:

KuulGroup provides you with the tools to access, review or update your personal information at any time through your account. If you wish to request deletion of your personal information, you can do so by contacting us using the contact details provided under the “How to contact us” heading below.

You can object to processing of your personal information, ask us to restrict processing of your personal information or request that it be ported to a third party. Again, you can exercise these rights by contacting us using the contact details provided under the “How to contact us” heading below.

You have the right to opt out of receiving marketing communication. To opt out, please contact us using the contact details provided under the “How to contact us” section below”

Similarly, if we collect and process your personal information on the basis of your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

You have the right to complain to a data protection supervisory authority about our collection and use of your personal information.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

Links to third-party sites

Our website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates or to any number of websites that may offer useful information to our visitors. We provide these links to you only as a convenience and the inclusion of any link does not imply endorsement of the relevant website by KuulGroup.

If you follow a link to any of these websites, please note that they have their own privacy policies and that we do not accept any responsibility or liability for these policies or those linked websites. Please check these policies before you submit any personal information to such websites.

Updates to this Privacy Policy

We may update this Privacy Policy from time to time in response to changing legal, technical or business developments. When we update our Privacy Policy, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Policy changes if and where this is required by applicable data protection laws.

We encourage you to periodically review this page for the latest information on our privacy practices.

How to contact us

If you have any questions or concerns about this Privacy Policy, please contact us:

By email at: support@kuulgroup.com

By writing to us at:

KuulGroup Ltd - Privacy Team

Atlantic House, 8 Bell Lane, Bellbrook Industrial Park, Uckfield, East Sussex, TN22 1QL, UK

The data controller of your personal information is the KuulGroup entity in the country in which you use our Services.

Global HQ: Atlantic House, 8 Bell Lane, Bellbrook Industrial Park, Uckfield, East Sussex, TN22 1QL, UK.
Company number: 11338501

Other KuulGroup Sites

KuulGroup

www.kuulgroup.com

KuulEats

www.restaurant.kuuleats.com

KuulFoods

<https://shop.kuulfoods.com>

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