

PRIVACY POLICY

Welcome to the Rareloop Limited's website "Privacy Policy".

Rareloop Limited respects your privacy and is committed to protecting your personal data. This Privacy Policy will inform you as to how we look after your personal data when you visit our website <https://mk.rareloop.com> (the "Website") (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

1. Important information and who we are

Purpose of this Privacy Policy

This Privacy Policy aims to give you information on how Rareloop Limited collects and processes your personal data through your use of this Website, including any data you may provide through this Website when you sign up to take part in a competition or sign up to our newsletter.

This Website is not intended for children under the age of 16 and we do not knowingly collect data relating to children.

It is important that you read this Privacy Policy together with any other Privacy Policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements other notices and privacy policies and is not intended to override them.

Controller

Rareloop Limited is the controller and responsible for your personal data (collectively referred to as Rareloop Limited, "we", "us" or "our" in this Privacy Policy).

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

Contact details

If you have any questions about this Privacy Policy or our privacy practices, please contact our data privacy manager in the following ways:

Full name of legal entity: Rareloop Limited

Email address: mk@rareloop.com

Postal address: Mazars LLP 5th Floor, Merck House, Seldown Lane, Poole, Dorset, England, BH15 1TW

We are registered with the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk) and comply with the Data Protection Act 2018.

You have the right to make a complaint at any time to the ICO, (www.ico.org.uk) about our use of your personal data. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the Privacy Policy and your duty to inform us of changes

We keep our Privacy Policy under regular review. This version was last updated in November 2021.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This Website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible or liable for their privacy statements. When you leave our Website, we encourage you to read the privacy policy of every website you visit.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data:** includes first name, maiden name, last name, username or similar identifier.
- **Contact Data:** includes email address.
- **Financial Data:** we do not collect your Financial Data via this Website.
- **Transaction Data:** we do not collect your Transactional Data via this Website.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this Website.
- **Profile Data:** includes your username and password, your Slack I.D (if applicable), your interests, preferences, feedback and survey responses.
- **Usage Data:** includes information about how you use our Website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Aggregated Data** includes statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the services and/or contract we

have or are trying to enter into with you (for example, to provide you with access to our Website and services).

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for our services;
 - create an account on our Website;
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our Website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie section below for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:

Technical Data from the following parties:

- (a) analytics providers such as Google based outside the EU; and
- (b) search information providers such as Google based outside the EU.

Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- The Performance of a Contract (as defined on page 10), where we need to perform the contract, we are about to enter into or have entered into with you.
- Where it is necessary for our Legitimate Interests (or those of a third party) (as defined on page 10) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a Legal Obligation (as defined on page 10).

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our Legitimate Interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground, we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing (as defined in the Glossary on page 10)
To register you as a new customer	(a) Identity (b) Contact	Performance of a Contract with you
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or Privacy Policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a Contract with you (b) Necessary to comply with a Legal Obligation (c) Necessary for our Legitimate Interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a Contract with you (b) Necessary for our Legitimate Interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our Legitimate Interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a Legal Obligation
To deliver relevant Website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our Legitimate Interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy).
To use data analytics to improve our Website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our Legitimate Interests (to define types of customers for our products and services, to keep our Website updated and relevant, to develop our business and to inform our marketing strategy)

To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our Legitimate Interests (to develop our products/services and grow our business)
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Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have opted in to receiving that marketing.

Opting out

You can ask us to stop sending you marketing messages at any time following the opt-out links on any marketing message sent to you.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

Cookies

“Cookies” are data files that are placed on your device or computer and often include an anonymous unique identifier. For more information about Cookies, and how to disable cookies, visit <http://www.allaboutcookies.org>. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this Website may become inaccessible or not function properly.

We use the following Cookies:

Strictly necessary Cookies.

These are Cookies that are required for the operation of our Website. They are necessary for the safety, security and integrity of the Website. For example, they help support the structure of the Website pages that are displayed to you, help to improve navigation and allow you to return to Website pages you have previously visited. This type of Cookie only lasts for the duration of the time you are visiting the Website. When you leave the Website, they are deleted automatically. We use a Session Cookie which expires once you log off or close the browser. They are only stored temporarily and are destroyed after leaving the webpage. When you log in to the Website, every time you open your browser and visit it, then it is using a Session Cookie to store your login details. We also use Token Cookies that verify your credentials and send an encrypted token to the browser. Then the browser will store this token and can be added to the authorization header of future requests.

- Performance Cookies or analytical Cookies.

They allow us to recognise and count the number of visitors and to see how visitors move around our Website when they are using it. This helps us to improve the way our Website works, for example, by ensuring that users are finding what they are looking for easily.

- **Functionality Cookies**

These are used to recognise you when you return to our Website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region). These Cookies will remain on your device until you choose to clear it. If you choose to do this, you will need to enter your details each time you visit the Website.

- **Targeting Cookies**

These Cookies will collect information about your browsing habits and allow us to show you adverts while You are browsing our Website and other websites on the internet. They are set by us or by carefully selected third parties. They help us to understand the performance of our marketing activities and improve the relevance of the adverts that you see.

- **Log files**

These track actions occurring on the Website, and collect data including your IP address, browser type, internet service provider, referring/exit pages, and date/time stamps.

- **Web beacons, tags, and pixels**

These are electronic files used to record information about how you browse the Website.

Any data collected is done so on the Website and via Google Analytics.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us on the details on page 1.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We may share your personal data with the parties set out below:

External Third Parties

- Service providers acting as processors, Digital Ocean - London Region, based in the UK, who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other local, national or international authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Policy. We require all third parties to respect the security of your personal data and to treat it

in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

Many of our external third parties are based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.
- Where We use providers based in the US, We may transfer the Data to them on the strict conditions that they abide by Article 49 of GDPR and provide similar protection to Data shared between UK and the US.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

While we try to make sure that your personal data is secure, we cannot guarantee the security of any personal data that you supply to us and therefore we cannot guarantee that it will be kept confidential. We do not warrant that your personal data is safe. If you suspect any misuse or loss or unauthorized access to your personal data, please let us know immediately by contacting us via the contact details on page 1.

If you want detailed information on how you can protect Your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org . Get Safe Online is supported by HM Government and leading businesses in the UK.

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our customers (including Contact and Identity Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see your legal rights below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please see the list below:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a Legitimate Interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us via the contact details above on page 1. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within thirty (30) days. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our Legitimate Interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our Legitimate Interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a Legal Obligation means processing your personal data where it is necessary for compliance with a legal obligation, locally, nationally or internationally that we are subject to.

11. General

You may not transfer any of your rights under this Privacy Policy to any other person or company. We may transfer our rights under this Privacy Policy at our sole discretion.

If any court or competent authority finds that any provision of this Privacy Policy (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted or amended, and the validity and enforceability of the other provisions of this Privacy Policy will not be affected.

Nothing in this Privacy Policy is intended to, or shall be deemed to, establish any partnership, joint venture or contract of employment between any of the parties.

Unless it expressly states otherwise, this Privacy Policy does not give rise to any third party rights under the Contracts (Rights of Third Parties) Act 1999 to enforce any term of this Privacy Policy. Each party confirms it is acting on its own behalf and not for the benefit of any other person or company.

Unless otherwise agreed, no delay, act or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy.

We are not liable for any liabilities, costs, expenses, damages and losses which may be suffered by you (or any person or company claiming under or through the Site), including but not limited to; any direct, indirect or consequential losses, loss of use; loss of profits; loss of anticipated savings; loss of business opportunity; loss of contracts; loss of goodwill; loss arising from damaged, corrupted or lost data, software or hardware; business losses; losses to non-consumers; any direct, indirect or consequential losses; loss of reputation; or all interest, penalties and legal and other professional costs and expenses, save for our:

- proven fraud or fraudulent misrepresentation;
- death or personal injury caused by our negligence;
- a breach of any obligations implied by section 12 of the Sale of Goods Act 1979 or section 2 of the Supply of Goods and Services Act 1982; or
- any matter for which it would be unlawful for us to exclude liability.

This Privacy Policy is governed by and interpreted according to the laws of England and Wales. All disputes or claims (including non-contractual disputes or claims) arising under this Privacy Policy are subject to the

exclusive jurisdiction of the English courts.