

## Privacy Policy

This Privacy Policy sets out how we, Orangutan TM Ltd (the operators of this website), collect, store and use information about you when you use or interact with our website, and where we otherwise obtain or collect information about you.

This Privacy Policy is effective from Thursday, May 27, 2021 Summary This section summarises how we obtain, store and use information about you. It is intended to provide a very general overview only. It is not complete in and of itself and it must be read in conjunction with the corresponding full sections of this Privacy Policy.

Data controller: Orangutan TM Ltd

We store your data in an encrypted format on a UK secure server in order to operate the services you sign up for.

For Merchants, we share your business name, contact name, address, email, telephone number, business and product descriptions with prospective and existing customers.

For prospects, we share your name, email, and telephone number with the merchants you specifically request us to have done and your name with the person that referred you.

For referrers, we share your name with the merchants you have referred to.

We use your data to contact you specifically for the operation of the services.

We do not sell any data nor use it to market third party services to you or your customers.

Should you integrate your account with a third party like Google or Microsoft, we store that authorisation token in order to enable that integration to happen

If you need to enter or upload any third party personal data to use either our system or third party integrations for email, sms etc then we delete that data immediately after we have processed or transferred that data to the third party.

By using third party services like Google and Microsoft, you will be subject to their terms and conditions and privacy policies.

How we collect or obtain information about you:

When you provide it to us (e.g. by contacting us, providing information through our contact form, through creating an account and through placing an order), from your use of our website and occasionally, from third parties.

Information we collect: name, title, contact details, phone numbers, IP address, information about your computer or device (e.g. device and browser type), information about how you use our website (e.g. which pages you have viewed, the time when you view them and what you clicked on and the geographical location from which you accessed our website (based on your IP address)).

How we use your information: for administrative and business purposes (particularly to contact you), to improve our business and website, to advertise our services, to analyse your use of our website, and in connection with our legal rights and obligations.

Disclosure of your information to third parties: only to the extent necessary to run our business, to our service providers, where required by law or to enforce our legal rights and obligations.

Do we sell your information to third parties (other than in the course of a business sale or purchase or similar event): No Use of automated decision-making and profiling: we use automated decision-making and profiling through our use of remarketing advertisements and web analytics. For further information, please see the main section below entitled Our use of automated decision-making and profiling.

How long we retain your information: for no longer than necessary, taking into account any legal obligations we have (e.g. to maintain records for tax purposes), any other legal basis we have for using your information (e.g. your consent, performance of a contract with you or our legitimate interests as a business) and certain additional factors described in the main section below entitled

How long we retain your information. For specific retention periods in relation to certain information which we collect from you, please see the main section below entitled How long we retain your information.

How we secure your information: using appropriate technical and organisational measures such as storing your information on secure servers, encrypting transfers of data to or from our servers using Secure Sockets Layer (SSL) technology, only granting access to your information where necessary.

Use of cookies: we use session cookies on our website to keep your session live – these are not used for any other purpose.

Transfers of your information outside the European Economic Area: In certain circumstances, we will transfer your information outside of the European Economic Area, including to the United States of America. Where we do so, we will ensure appropriate safeguards are in place, including, for example, that the third parties we use who transfer your information outside the European Economic Area have self-certified themselves as compliant with the EU-U.S. Privacy Shield or ensuring that EU-approved model clauses are in place.

Your rights in relation to your information • to access your information and to receive information about its use • to have your information corrected and/or completed • to have your information deleted • to restrict the use of your information • to receive your information in a portable format • to object to the use of your information • to withdraw your consent to the use of your information • not to have significant decisions made about you based solely on automated processing of your information, including profiling • to complain to a supervisory authority Sensitive personal information: we do not knowingly or intentionally collect what is commonly referred to as 'sensitive personal information'. Please do not submit sensitive personal information about you to us. For more information, please see the main section below entitled Sensitive Personal Information.

Our details The data controller in respect of our website is Orangutan TM Ltd, a limited liability company registered in England and Wales (company registration number 4187854 ). Our registered address is Lodene Southfields Road, Woldingham CR3 7BG.

You can contact the data controller by writing to Orangutan, 63 Somerset Road, Redhill RH1 6ND or sending an email to [info.orangutan.co.uk](mailto:info.orangutan.co.uk) If you have any questions about this Privacy Policy, please contact the data controller.

Data protection officer The data protection officer for the data protection officer is Tim Peniston-Bird You can contact the data protection officer by writing to Orangutan, 63 Somerset Road, Redhill RH1 6ND or sending an email to [info.orangutan.co.uk](mailto:info.orangutan.co.uk) Information we collect when you visit our website We collect and use information from website visitors in accordance with this section and the section entitled Disclosure and additional uses of your information.

Web server log information We use a third-party server to host our website called UKFAST, the privacy policy of which is available here: <https://www.ukfast.co.uk/terms/privacy-policy.html> Our website server automatically logs the IP address you use to access our website as well as other information about your visit such as the pages accessed, information requested, the geographical location, the date and time of the request, the source of your access to our website (e.g. the website or URL (link) which referred you to our website), and your browser version and operating system. Our server is located in the United Kingdom.

Use of website server log information for IT security purposes Our third-party hosting provider collects and stores server logs to ensure network and IT security and so that the server and website remain uncompromised. This includes analysing log files to help identify and prevent unauthorised access to our network, the distribution of malicious code, denial of services attacks and other cyber-attacks, by detecting unusual or suspicious activity.

Unless we are investigating suspicious or potential criminal activity, we do not make, nor do we allow our hosting provider to make, any attempt to identify you from the information collected via server logs.

Legal basis for processing: compliance with a legal obligation to which we are subject (Article 6(1)(c) of the General Data Protection Regulation).

Legal obligation: we have a legal obligation to implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk of our processing of information about individuals. Recording access to our website using server log files is such a measure.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interests: we have a legitimate interest in using your information for the purposes of ensuring network and information security.

Cookies and similar technologies Cookies are data files which are sent from a website to a browser to record information about users for various purposes. We only use session cookies that are anonymous records to keep your current web session active.

Information we collect when you contact us We collect and use information from individuals who contact us in accordance with this section and the section entitled Disclosure and additional uses of your information.

Email When you send an email to the email address displayed on our website we collect your email address and any other information you provide in that email (such as your name, telephone number and the information contained in any signature block in your email).

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest(s): responding to enquiries and messages we receive and keeping records of correspondence.

Legal basis for processing: necessary to perform a contract or to take steps at your get to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: where your message relates to us providing you with goods or services or taking steps at your get prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process your information in order to do so.

For further information about the safeguards used when your information is transferred outside the European Economic Area, see the section of this privacy policy below entitled Transfers of your information outside the European Economic Area.

Contact form When you contact us using our contact form, we collect your name, postcode and any information you include in the message field.

If you do not provide the mandatory information required by our contact form, you will not be able to submit the contact form and we will not receive your enquiry.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest(s): responding to enquiries and messages we receive and keeping records of correspondence.

Legal basis for processing: necessary to perform a contract or to take steps at your get to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: where your message relates to us providing you with goods or services or taking steps at your get prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process your information in order to do so.

Transfer and storage of your information We store messages you send us via our contact form on our third-party website server, Heart Internet, in the United Kingdom.

Phone When you contact us by phone, we collect your phone number and any information provide to us during your conversation with us.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest(s): responding to enquiries and messages we receive and keeping records of correspondence.

Legal basis for processing: necessary to perform a contract or to take steps at your get to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: where your message relates to us providing you with goods or services or taking steps at your get prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process your information in order to do so.

Transfer and storage of your information Information about your call, such as your phone number and the date and time of your call, is processed by our third-party telephone service provider and stored in the United Kingdom.

Post If you contact us by post, we will collect any information you provide to us in any postal communications you send us.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest(s): responding to enquiries and messages we receive and keeping records of correspondence.

Transfer and storage of your information Information you submit to us by post will be stored in the United Kingdom.

Information we collect when you interact with our website We collect and use information from individuals who interact with particular features of our website in accordance with this section and

the section entitled Disclosure and additional uses of your information.

Registering on our website When you register and create an account on our website, we collect the following information:

For merchants: company name, company address, company phone number, company website, users name, contact email address, password and any information you include in the additional business and product descriptions.

For referrers and prospects: name, phone number, user name, email address, password and any information you include in the comments box.

If you do not provide the mandatory information required by the registration form, you will not be able to register or create an account on our website.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest: registering and administering accounts on our website to provide you the ability to upload feedback, and facilitate the running and operation of our business.

Legal basis for processing: necessary to perform a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: we need the mandatory information collected by our registration form to establish who the contract is with and to contact you to fulfil our obligations under the contract, including sending you receipts and order confirmations.

Legal basis for processing: compliance with a legal obligation (Article 6(1)(c) of the General Data Protection Regulation).

Legal obligation: we have a legal obligation to issue you with an invoice for the goods and services you purchase from us where you are VAT registered and we require the mandatory information collected by our registration form for this purpose. We also have a legal obligation to keep accounting records, including records of transactions.

Transfer and storage of your information Information you submit to us in order for us to create a members account, will be stored within the European Economic Area on our third-party hosting provider's servers in the United Kingdom.

Information we collect when you place an order on our website We collect and use information from individuals who place an order on our website in accordance with this section and the section entitled Disclosure and additional uses of your information.

Information collected when you place an order Mandatory information When you place an order to open an account on our website, we collect the information you submitted to open the account, which can be seen above under the heading Registering on our website.

If you do not provide this information, you will not be able to purchase goods or services from us on our website or enter into a contract with us.

Legal basis for processing: necessary to perform a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: we need the mandatory information collected by our checkout form to establish who the contract is with and to contact you to fulfil our obligations under the contract, including sending you receipts and order confirmations.

Legal basis for processing: compliance with a legal obligation (Article 6(1)(c) of the General Data Protection Regulation).

Legal obligation: we have a legal obligation to issue you with an invoice for the goods and services you purchase from us where you are VAT registered and we require the mandatory information collected by our checkout form for this purpose. We also have a legal obligation to keep accounting records, including records of transactions.

Legal basis for processing: we collect your phone number for our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest(s): we collect your phone number for our legitimate interest of more easily and effectively contacting you in relation to your order and your account.

Transfer and storage of your information Information you submit to us in order for us to create a members account, will be stored within the European Economic Area on our third-party hosting provider's servers in the United Kingdom.

Processing your payment After you place an order you will need to make payment for the goods or services you have ordered.

In order to process your payment, we use a third-party payment processor, First Data. Your payment will be processed by Stripe.

Stripe collects, uses and processes your information, including payment information, in accordance with their privacy policies. You can access their privacy policies via the following link:

<https://stripe.com/gb/privacy> Transfer and storage of your information Stripe may transfer information relating to your transaction and the processing of your transaction outside the European Economic Area. Where they do so, they will put appropriate safeguards in place.

For further information about the safeguards used when your information is transferred outside the European Economic Area, see the section of this privacy policy below entitled Transfers of your information outside the European Economic Area.

Legal basis for processing: necessary to perform a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: to fulfil your contractual obligation to pay for the goods or services you have ordered from us.

Information collected or obtained from third parties This section sets out how we obtain or collect information about you from third parties.

Information received from third parties Generally, we do not receive information about you from third parties. The third parties from which we receive information about you will generally include other businesses and clients we work with from time to time who may recommend our services to you. These could be businesses in any industry, sector, sub-sector or location.

It is also possible that third parties with whom we have had no prior contact may provide us with information about you.

Information we obtain from third parties will generally be your name and contact details, but will include any additional information about you which they provide to us.

Legal basis for processing: necessary to perform a contract or to take steps at your get to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: where a third party has passed on information about you to us (such as your name and email address) in order for us to provide services to you, we will process your information in order to take steps at your get to enter into a contract with you and perform a contract with you (as the case may be).

Legal basis for processing: consent (Article 6(1)(a) of the General Data Protection Regulation).

Consent: where you have asked that a third party to share information about you with us and the purpose of sharing that information is not related to the performance of a contract or services by us to you, we will process your information on the basis of your consent, which you give by asking the third party in question to pass on your information to us.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interests: where a third party has shared information about you with us and you have not consented to the sharing of that information, we will have a legitimate interest in processing that information in certain circumstances.

For example, we would have a legitimate interest in processing your information to perform our obligations under a sub-contract with the third party, where the third party has the main contract with you. Our legitimate interest is the performance of our obligations under our sub-contract.

Similarly, third parties may pass on information about you to us if you have infringed or potentially infringed any of our legal rights. In this case, we will have a legitimate interest in processing that information to investigate and pursue any such potential infringement.

Where we receive information about you in error if we receive information about you from a third party in error and/or we do not have a legal basis for processing that information, we will delete your information.

Information obtained by us from third parties In certain circumstances (for example, to verify the information we hold about you or obtain missing information we require to provide you with a service) we will obtain information about you from certain publicly accessible sources, both EU and non-EU, such as Companies House, online customer databases, business directories, media publications, social media, and websites (including your own website if you have one) and any affiliates.

Legal basis for processing: necessary to perform a contract or to take steps at your get to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: where you have entered into a contract or requested that we enter into a contract with you, in certain circumstances, we will obtain information about you from public sources in order to enable us to understand your business and provide services to you or services to a sufficient standard.

For example, we would obtain and/or verify your email address from your website or from a directory where you ask us to send you information by email but we do not possess the information or we need to confirm that we have recorded your email address correctly.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interests: in certain circumstances, we will have a legitimate interest in obtaining information about you from public and private sources. For example, if you have infringed or we suspect that you have infringed any of our legal rights, we will have a legitimate interest in obtaining and processing information about you from such sources in order to investigate and pursue any suspected or potential infringement.

Our use of automated decision-making and profiling We use automated decision-making and profiling.

You have the right to object to our use of profiling described in this section. You can do that by opting out of cookies and similar technologies in accordance with the method described in the relevant section below. If you do not want us to process your actual IP address (usually the IP address assigned to you by your Internet Service Provider) when you visit our website, you can use a Virtual Private Network (VPN) or a free service such as Tor.

Automated decision making is decision making by technological means (i.e. by a machine) without human involvement.

Use of automated decision-making for display advertising We automate the display advertisements containing our products and services on other websites you visit, you based on the fact that you have visited our website using your IP / Mac address.

Logic involved: automatically displaying advertisements to individuals who have visited our website results in increased efficiencies and costs savings for us than manually displaying advertisements or displaying advertisements by different means.

Significance and envisaged consequences: cookies will be used to recognise the fact that you have visited our website in order to display advertisements to you and will collect information about your online behaviour.

How to object: you can block your IP address and Mac address by using a VPN Data Protection Regulation).

Consent: you consent to our use of automated decision-making by turning on remarketing cookies using our cookie control tool.

Profiling Profiling is any form of automated processing of your information to evaluate personal aspects about you, in particular to analyse or predict things like your performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

Use of profiling for web analytics Our web analytics service, Google Analytics uses collects information such as your location (based on your IP address) Logic involved: by automatically analysing and categorising information such as the location (based on IP address) as well as the behaviour and devices of visitors to our website (using cookies), we are able to gain a better understanding of what our website visitors want (in terms of the content of our website and our products), how to improve our website and how to advertise and market our services to them.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest: improving our website for our website users and getting to know our website user's preferences so our website can better meet their needs and desires.

Disclosure and additional uses of your information This section sets out the circumstances in which will disclose information about you to third parties and any additional purposes for which we use your information.

Disclosure of your information to service providers We use a number of third parties to provide us with services which are necessary to run our business or to assist us with running our business

and who process your information for us on our behalf.

These include the following:

Telephone provider (UK), IT service provider (UK), Web developer (UK), and Hosting provider (UK).

Your information will be shared with these service providers where necessary to provide you with the service you have requested, whether that is accessing our website or ordering goods and services from us.

We do not display the identities of all of our service providers publicly by name for security and competitive reasons. If you would like further information about the identities of our service providers,

however, please contact us directly by email and we will provide you with such information where you have a legitimate reason for requesting it (where we have shared your information with such service providers, for example).

Legal basis for processing: legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest relied on: where we share your information with these third parties in a context other than where is necessary to perform a contract (or take steps at your get to do so), we will share your information with such third parties in order to allow us to run and manage our business efficiently.

Legal basis for processing: necessary to perform a contract and/or to take steps at your get prior to entering into a contract (Article 6(1)(b) of the General Data Protection Regulation).

Reason why necessary to perform a contract: we may need to share information with our service providers to enable us to perform our obligations under that contract or to take the steps you have requested before we enter into a contract with you.

Disclosure of your information to other third parties We disclose your information to other third parties in specific circumstances, as set out below.

Google collects information through our use of Google Analytics on our website. Google uses this information, including IP addresses and information from cookies, for a number of purposes, such as improving its Google Analytics service. Information is shared with Google on an aggregated and anonymised basis. To find out more about what information Google collects, how it uses this information and how to control the information sent to Google, please see the following page:

<https://www.google.com/policies/privacy/partners/> Accountants We share information with our accountants for tax purposes. For example, we share invoices we issue and receive with our accountants for the purpose of completing tax returns and our end of year accounts.

Our accountants are located in the United Kingdom.

Advisors Occasionally, we obtain advice from advisors, such as accountants, financial advisors, lawyer and public relations professionals. We will share your information with these third parties only where it is necessary to enable these third parties to be able to provide us with the relevant advice.

Our advisors are located in the United Kingdom.

Affiliates Affiliates are individuals or entities we work with to promote our business or their own business by various means, including by advertising our services on their websites, for example. Affiliates will share information with us and we will share information with them where you have expressed an interest in our products or services.

Our affiliates are located in the United Kingdom.

Business partners Business partners are businesses we work with which provide goods and services which are complementary to our own or which allow us to provide goods or services which we could not provide on our own. Whilst we do not share information with Business Partners, by following a link to one of their offers you may need to disclose your information in connection with their privacy policy.

Insurers We will share your information with our insurers where it is necessary to do so, for example in relation to a claim or potential claim we receive or make or under our general disclosure obligations under our insurance contract with them.

Our insurers are located in the United Kingdom.

Sharing your information with a prospective or actual purchaser or seller in the context of a business or asset sale or acquisition by us, a merger or similar business combination event, whether actual or potential.

Legal basis for processing: legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest(s): sharing your information with a prospective purchaser, seller or similar person in order to allow such a transaction to take place.

Disclosure and use of your information for legal reasons Indicating possible criminal acts or threats to public security to a competent authority If we suspect that criminal or potential criminal conduct has been occurred, we will in certain circumstances need to contact an appropriate authority, such as the police. This could be the case, for instance, if we suspect that a fraud or a cyber-crime has been committed or if we receive threats or malicious communications towards us or third parties.

We will generally only need to process your information for this purpose if you were involved or affected by such an incident in some way.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interests: preventing crime or suspected criminal activity (such as fraud).

In connection with the enforcement or potential enforcement of our legal rights We will use your information in connection with the enforcement or potential enforcement of our legal rights, including, for example, sharing information with debt collection agencies if you do not pay amounts owed to us when you are contractually obliged to do so. Our legal rights may be contractual (where we have entered into a contract with you) or non-contractual (such as legal rights that we have under copyright law or tort law).

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest: enforcing our legal rights and taking steps to enforce our legal rights.

In connection with a legal or potential legal dispute or proceedings We may need to use your information if we are involved in a dispute with you or a third party for example, either to resolve the dispute or as part of any mediation, arbitration or court resolution or similar process.

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest(s): resolving disputes and potential disputes.

For ongoing compliance with laws, regulations and other legal requirements We will use and process your information in order to comply with legal obligations to which we are subject. For example, we may need to disclose your information pursuant to a court order or subpoena if we receive one.

Legal basis for processing: compliance with a legal obligation (Article 6(1)(c) of the General Data Protection Regulation).

Legal obligation(s): legal obligations to disclose information which are part of the laws of England and Wales, or if they have been integrated into the United Kingdom's legal framework (for example in the form of an international agreement which the United Kingdom has signed).

Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

Legitimate interest: where the legal obligations are part of the laws of another country and have not been integrated into the United Kingdom's legal framework, we have a legitimate interest in complying with these obligations.

How long we retain your information This section sets out how long we retain your information. We have set out specific retention periods where possible. Where that has not been possible, we have set out the criteria we use to determine the retention period.

Retention periods Order information: when you place an order for goods and services, we retain that information for seven years following the date on which you place your order for tax purposes and to defend against legal claims.

Correspondence and enquiries: when you make an enquiry, or correspond with us for any reason, whether by email, via post or by phone, we will retain your information for as long as it takes to respond to and resolve your enquiry, and for one further year, after which point we will delete your information.

Criteria for determining retention periods In any other circumstances, we will retain your information for no longer than necessary, taking into account the following:

- the purpose(s) and use of your information both now and in the future (such as whether it is necessary to continue to store that information in order to continue to perform our obligations under a contract with you or to contact you in the future);
- whether we have any legal obligation to continue to process your information (such as any record-keeping obligations imposed by relevant law or regulation);
- whether we have any legal basis to continue to process your information (such as your consent);
- how valuable your information is (both now and in the future);
- any relevant agreed industry practices on how long information should be retained;
- the levels of risk, cost and liability involved with us continuing to hold the information;
- how hard it is to ensure that the information can be kept up to date and accurate; and
- any relevant surrounding circumstances (such as the nature and status of our relationship with you).

How long we retain your information This section sets out how long we retain your information. We have set out specific retention periods where possible. Where that has not been possible, we have set out the criteria we use to determine the retention period.

Retention periods Order information: when you place an order for goods and services, we retain that information for seven years following the date on which you place your order for tax purposes and to defend against legal claims.

Correspondence and enquiries: when you make an enquiry, or correspond with us for any reason, whether by email, via post or by phone, we will retain your information for as long as it takes to respond to and resolve your enquiry, and for one further year, after which point we will delete your information.

Criteria for determining retention periods In any other circumstances, we will retain your information for no longer than necessary, taking into account the following:

- the purpose(s) and use of your information both now and in the future (such as whether it is necessary to continue to store that information in order to continue to perform our obligations under a contract with you or to contact you in the future);
- whether we have any legal obligation to continue to process your information (such as any record-keeping obligations imposed by relevant law or regulation);
- whether we have any legal basis to continue to process your information (such as your consent);
- how valuable your information is (both now and in the future);
- any relevant agreed industry practices on how long information should be retained;
- the levels of risk, cost and liability involved with us continuing to hold the information;
- how hard it is to ensure that the information can be kept up to date and accurate; and
- any relevant surrounding circumstances (such as the nature and status of our relationship with you).

How we secure your information We take appropriate technical and organisational measures to secure your information and to protect it against unauthorised or unlawful use and accidental loss or destruction, including:

only sharing and providing access to your information to the minimum extent necessary, subject to confidentiality restrictions where appropriate, and on an anonymised basis wherever possible;

- using secure servers to store your information;
- verifying the identity of any individual who requests access to information prior to granting them access to information; and
- using Secure Sockets Layer (SSL) software to encrypt any information you submit to us via any forms on our website.

- Transmission of information to us by email • Transmission of information over the internet is not entirely secure, and if you submit any information to us over the internet (whether by email, via our website or any other means), you do so entirely at your own risk.

- We cannot be responsible for any costs, expenses, loss of profits, harm to reputation, damages, liabilities or any other form of loss or damage suffered by you as a result of your decision to transmit information to us by such means.

Stripe Stripe may transfer information they process about your order outside the EEA. Where they do so, they will ensure appropriate safeguards are in place.

You can access Stripe's privacy policy here: <https://stripe.com/gb/privacy> Your rights in relation to your information Subject to certain limitations on certain rights, you have the following rights in

relation to your information, which you can exercise by updating your information in your account session of the website to:

- to get access to your information and information related to our use and processing of your information; • to get the correction or deletion of your information; • to get that we restrict our use of your information; • to receive information which you have provided to us in a structured, commonly used and machine-readable format (e.g. a CSV file) and the right to have that information transferred to another data controller (including a third-party data controller); • to object to the processing of your information for certain purposes (for further information, see the section below entitled Your right to object to the processing of your information for certain purposes); and • to withdraw your consent to our use of your information at any time where we rely on your consent to use or process that information. Please note that if you withdraw your consent, this will not affect the lawfulness of our use and processing of your information on the basis of your consent before the point in time when you withdraw your consent.

- In accordance with Article 77 of the General Data Protection Regulation, you also have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or of an alleged infringement of the General Data Protection Regulation.

- For the purposes of the UK, the supervisory authority is the Information Commissioner's Office (ICO), the contact details of which are available here: <https://ico.org.uk/global/contactus/> Further information about your rights in relation to your personal data as an individual The above rights are provided in summary form only and certain limitations apply to many of these rights. For further information about your rights in relation to your information, including any limitations which apply, please visit the following pages on the ICO's website:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individualrights/> and <https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/> You can also find out further information about your rights, as well as information on any limitations which apply to those rights, by reading the underlying legislation contained in Articles 12 to 22 and 34 of the General Data Protection Regulation, which is available here: [http://ec.europa.eu/justice/dataprotection/reform/files/regulation\\_oj\\_en.pdf](http://ec.europa.eu/justice/dataprotection/reform/files/regulation_oj_en.pdf) Verifying your identity where you get access to your information Where you get access to your information, we are required by law to use all reasonable measures to verify your identity before doing so.

These measures are designed to protect your information and to reduce the risk of identity fraud, identity theft or general unauthorised access to your information.

How we verify your identity Where we possess appropriate information about you on file, we will attempt to verify your identity using that information.

If it is not possible to identify you from such information, or if we have insufficient information about you, we may require original or certified copies of certain documentation in order to be able to verify your identity before we are able to provide you with access to your information.

We will be able to confirm the precise information we require to verify your identity in your specific circumstances if and when you make such a request.

Your right to object to the processing of your information for certain purposes You have the following rights in relation to your information, which you may exercise in the same way as you may exercise by writing to JUST SNAP, 63 Somerset Road, Redhill RH1 6ND or sending an email to [info@orangutan.co.uk](mailto:info@orangutan.co.uk):

to object to us using or processing your information where we use or process it in order to carry out a task in the public interest or for our legitimate interests, including 'profiling' (i.e. analysing or predicting your behaviour based on your information) based on any of these purposes; and to object to us using or processing your information for direct marketing purposes (including any profiling we engage in that is related to such direct marketing).

You may also exercise your right to object to us using or processing your information for direct marketing purposes by:

- Clicking the unsubscribe link contained at the bottom of any marketing email we send to you and following the instructions which appear in your browser following your clicking on that link; or • sending an email to [info@orangutan.co.uk](mailto:info@orangutan.co.uk), asking that we stop sending you marketing communications or by including the words "OPT OUT".

Sensitive Personal Information 'Sensitive personal information' is information about an individual that reveals their racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic information, biometric information for the purpose of uniquely identifying an individual, information concerning health or information concerning a natural person's sex life or sexual orientation.

We do not knowingly or intentionally collect sensitive personal information from individuals, and you must not submit sensitive personal information to us.

If, however, you inadvertently or intentionally transmit sensitive personal information to us, you will be considered to have explicitly consented to us processing that sensitive personal information under Article 9(2)(a) of the General Data Protection Regulation. We will use and process your sensitive personal information for the purposes of deleting it.

Changes to our Privacy Policy We update and amend our Privacy Policy from time to time.

Minor changes to our Privacy Policy Where we make minor changes to our Privacy Policy, we will update our Privacy Policy with a new effective date stated at the beginning of it. Our processing of your information will be governed by the practices set out in that new version of the Privacy Policy from its effective date onwards.

Major changes to our Privacy Policy or the purposes for which we process your information Where we make major changes to our Privacy Policy or intend to use your information for a new purpose

or a different purpose than the purposes for which we originally collected it, we will notify you by email (where possible) or by posting a notice on our website.

We will provide you with the information about the change in question and the purpose and any other relevant information before we use your information for that new purpose.

Wherever required, we will obtain your prior consent before using your information for a purpose that is different from the purposes for which we originally collected it.

Children's Privacy Because we care about the safety and privacy of children online, we comply with the Children's Online Privacy Protection Act of 1998 (COPPA). COPPA and its accompanying regulations protect the privacy of children using the internet. We do not knowingly contact or collect information from persons under the age of 18. The website is not intended to solicit information of any kind from persons under the age of 18.

It is possible that we could receive information pertaining to persons under the age of 18 by the fraud or deception of a third party. If we are notified of this, as soon as we verify the information, we will, where required by law to do so, immediately obtain the appropriate parental consent to use that information or, if we are unable to obtain such parental consent, we will delete the information from our servers. If you would like to notify us of our receipt of information about persons under the age of 18, please do so by sending an email to [info@orangutan.co.uk](mailto:info@orangutan.co.uk).

California Do Not Track Disclosures "Do Not Track" is a privacy preference that users can set in their web browsers. When a user turns on a Do Not Track signal in their browser, the browser sends a message to websites requesting that they do not track the user. For information about Do Not Track, please visit <http://www.allaboutdnt.org> At this time, we do not respond to Do Not Track browser settings or signals. In addition, we use other technology that is standard to the internet, such as pixel tags and other similar technologies, to track visitors to the website. Those tools may be used by us and by third parties to collect information about you and your internet activity, even if you have turned on the Do Not Track signal.

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