



Josa Privacy Policy

26 February 2021

Introduction

Josa Technologies Limited (“**Josa**”, ‘**we**’, ‘**our**’ and ‘**us**’) (company number: 13209969) of 20-22 Wenlock Road, London, England, N1 7GU (United Kingdom) is the controller and responsible for your personal data.

As part of our business, we may process information about you.

We respect your privacy and are committed to protecting and treating your personal data in compliance with UK data protection legislation from time to time in force in the UK including the Data Protection Act 2018 (“**DPA**”) or any successor legislation, as well as the General Data Protection Regulation (“**GDPR**”) or any successor legislation from time to time in force, (collectively referred to as “**the Regulations**”).

By using our services, you agree to be bound by this privacy policy and that we proceed to the processing of personal data on the terms outlined below.

Please use the Glossary to understand the meaning of some of the terms used in this privacy policy.

1. Important information Purpose of this

privacy policy

This privacy policy aims to inform you as to how we look after your personal data when you visit the Site (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy policy also aims to give you information on how Josa collects and processes your personal data through your use of the Site, including any data you may provide through the Site when you sign up for or purchase our services.

The Site is not intended for children and we do not knowingly collect data relating to children.

This privacy policy (as well as our cookie policy, the terms and conditions for our supply of services and any other agreement to which these documents could refer), together the “**Documents**”, details the way we treat your personal data.

It is important that you read the Documents 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.

We have appointed a data protection officer (“**DPO**”) 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 DPO using the details set out below.

Contact details

If you have any questions about this privacy policy or our privacy practices, please contact us by any of the following means:

- By email to: info@josa.co;
- By mail to: JOSA TECHNOLOGIES LIMITED, 20-22 Wenlock Road, London, England, N1 7GU, UK.

Complaints

You have the right to make a complaint at any time to the Information Commissioner's Office ("ICO"), the UK supervisory authority for data protection issues (www.ico.org.uk). 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

We keep our privacy policy under regular review and we reserve the right to change this privacy policy at any time without notice.

When necessary, we will notify you by email of any changes to this privacy policy.

We invite you to regularly review this privacy policy available on our Site, to learn about any changes.

Historic versions of our privacy policy can be obtained by contacting us.

Your duty to inform us of changes

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

The Site 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 for their privacy statements. When you leave the Site, 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, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type (e.g. Safari, Chrome, Internet Explorer, etc.) 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 the Site.

- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use the Site, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as 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 feature on the Site. 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 contract we have or are trying to enter into with you (for

example, to provide you with services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

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 and Financial Data 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 Site;
 - subscribe to our service;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey;
 - provide us with details for our production of products and/or services;
 - report a problem with our Site; or
 - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with the Site, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy for further details.
- Third parties or publicly available sources. We will 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 UK;
- (b) advertising networks such as Facebook based outside the UK]; and
- (c) search information providers such as Google based outside the UK.

- Contact, Financial and Transaction Data from providers of technical and payment services such as Stripe based outside the UK.
- Identity and Contact Data from data brokers or aggregators based inside or outside the UK.
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the UK.

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:

- 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) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

The types of lawful bases that we will rely on to process your personal data is set out in the Glossary.

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 or text message. 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 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 including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including:	(a) Identity (b) Contact	(a) Performance of a contract with you

<p>(a) Manage payments, fees and charges</p> <p>(b) Collect and recover money owed to us</p>	<p>(c) Financial</p> <p>(d) Transaction</p> <p>(e) Marketing and Communications</p>	<p>(b) Necessary for our legitimate interests (to recover debts due to us)</p>
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Asking you to leave a review or take a survey</p> <p>(c) Allowing you to contact our customer service</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>
<p>To enable you to partake in a prize draw, competition or complete a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>
<p>To administer and protect our business and the Site (including troubleshooting, resolving anomalies, data analysis, testing, research, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(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)</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant Site content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p> <p>(f) Technical</p>	<p>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)</p>
<p>To use data analytics</p>	<p>(a) Technical</p>	<p>Necessary for our legitimate</p>

to improve the Site, products/services, marketing, customer relationships and experiences	(b) Usage	interests (to define types of customers for our products and services, to keep the Site 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, based on what you purchased or subscribed to on our Site	(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)

Marketing

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

Our use of your data for marketing purposes (by email, SMS, MMS, automated calling machine, fax machine, etc.) is based on your express and specific consent (which will be collected through a checkbox for example, or a positive action on your part).

However, email marketing will not require your consent if you are already one of our clients and the email we send to you relates to products or services similar to those we have provided to you in the past, or if we write to you as a professional. For more details, see the “Promotional offers from us” section below.

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 not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by logging into the Site and checking or unchecking relevant boxes to adjust your marketing preferences, by following the opt-out links (where available) on any marketing message sent to you or by contacting us at any time.

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, product/service experience or other transactions.

Cookies

A “cookie” is a file sent by a website which is intended to collect and store information about your interaction with that particular website.

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 the Site may become inaccessible or not function properly. For more information about the cookies we use, please see our cookie policy.

These cookies will be stored for a maximum of thirteen (13) months. They will then be deleted.

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.

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 for the purposes set out in the table under the “purposes for which we will use your personal data” section above:

- External Third Parties as set out in the Glossary.
- 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

Your personal data are processed mainly within the UK and the European Economic Area (“EEA”).

Whenever our relations with partners, our subcontractors or third parties (such as those who provide us with support services) involve cross-border exchanges of your personal data outside the UK and the EEA, we ensure a similar degree of protection is afforded to your personal data by ensuring that at least one of the following safeguards is implemented:

- (i) 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 or the UK (as applicable).
- (ii) If we transfer your personal data to any other country which is not subject to an adequacy decision of the European Commission or the UK (as applicable) regarding an adequate level of protection of personal data, we will ensure that there is a legal basis and, if required, a relevant safeguard method for such data transfer so that your personal data are treated in a manner that is consistent with, and respects the applicable laws and regulations on data protection in the EEA or the UK (as applicable).
- (iii) Where we use certain service providers, we may use specific contracts approved by the

European Commission or the UK (as applicable) which give personal data the same protection it has in the EEA or the UK (as applicable).

In any event, you agree to your personal data being processed under these conditions, outside the EEA and the UK.

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

7. Data security

Security is at the heart of our concerns.

We implement appropriate technical and organisational measures, including physical solutions, hardware and software, in order to preserve the security, integrity and confidentiality of your personal data and protect against unauthorised access, use, misuse, alteration, disclosure or destruction by unauthorised persons.

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.

In addition, we require the recipients of the data to provide sufficient guarantees of security and confidentiality.

Furthermore, we encourage you to notify us of any security breach capable of generating a breach to your rights and freedoms.

You are responsible for the confidentiality of the password you select and/or the password assigned to you to access certain features of the Site. You are not allowed to share the password with others.

8. How long will we use your 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.

Details of retention periods for different aspects of your personal data are as follows:

Data relating to the management of our customers and prospective customers:

The data relating to our customers will not be kept beyond the period strictly necessary for the management of the commercial relationship.

However, we may keep your data for analysis and statistics, for longer than the time required for the purpose of contract fulfilment, after having irreversibly anonymised this data.

Your data that are used for marketing purposes will be retained for a maximum period of three (3) years from the end of the business relationship (such as booking appointments, purchasing products and your last contact).

After this period of three (3) years, we are committed to destroying your personal data.

If you are one of our prospective customers, your data will be kept for a period of three (3) years from the date of collection or date of last contact from you (examples of such contact include everyday contact, contact to ask for documentation or clicking on a hyperlink contained in one of the emails that we sent you for marketing purposes).

At the end of this three (3) year period, we will contact you again to find out if you want to continue receiving commercial contact and/or marketing information from us.

In the absence of a positive response from you, we are committed to deleting or archiving your personal data.

Data for identification:

In order to exercise your legal rights under the Regulations, you have to confirm your identity by submitting an identity document (for example, a photo of the picture page of your passport). The data relating to your identity document will be kept for a period of one (1) year.

If you exercise your right to object to processing, the data concerned with the objection itself will be archived after three (3) years from the date of the objection.

Data relating to the measurements of Site activity:

The information stored on your device (for example, through cookies), or any other item used to identify you and allow your traceability, will not be retained beyond thirteen (13) months.

New visits that you make to our Site will not extend the life of such information.

The raw data allowing us to know when you or other interested parties visit our Site will also not be kept beyond thirteen (13) months.

Beyond this time, your data will either be deleted or anonymised.

Data from your account on our Site:

Your account will be considered inactive two (2) years after your last use of this account. After this period, the data relating to your inactive account will be deleted, but not before you have been notified and have had the opportunity to oppose it.

In the event that we continue to process your data regardless of the closure of your account, you will have the opportunity to exercise your legal rights under the Regulations.

9. Your legal rights

Under certain circumstances, you have rights under the Regulations in relation to your personal data.

If you wish to exercise any of your legal rights set out in the Glossary, please contact us.

No fee usually required

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 (such as a copy of your passport and your signature) 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.

We would also require your correspondence address, where our reply to your request may be sent to.

Where you exercise your legal right to object to processing, you must provide proof of a legitimate reason, except in the case where your data are processed for marketing purposes.

Time limit to respond

We try to respond to all legitimate requests within one month. 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 that we are subject to.

SITE

Site means this website and/or our mobile application.

THIRD PARTIES

External Third Parties

- Our business partners, service providers, subcontractors and any other person involved for the performance of contract with you acting as processors based in the United Kingdom who provide services such as marketing, sales, payment, customer service, logistics, IT and system administration services.
- Professional advisers acting as processors including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors based in the United Kingdom.
- Any third party that would acquire us or a substantial part of our shares.

YOUR LEGAL RIGHTS

You have the right to:

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.

Request to not be subjected to a decision based solely on automated processing, including profiling, which produces legal effects concerning you, or significantly affects you. We will then implement suitable measures to safeguard your rights, freedoms and legitimate interests, or at least the right to obtain human intervention and contest the decision. However, this right will not apply if the decision:

- is necessary for entering into, or the performance of, a contract between you and us;
- is authorised by the relevant laws; or

- is based on your explicit consent.