



## Privacy Policy

### 1. Introduction

a. Kim Technologies takes your privacy very seriously and is committed to protecting your personal data. Personal data, or personal information, means any information about an individual from which that person can be identified.

We ask that you read this Kim Platform Privacy Policy carefully as it contains important information about what to expect when Kim Technologies collects personal information about you, how Kim Technologies will use your personal data, your privacy rights and how the law protects you.

Kim Technologies Limited is a company registered in England under registration number 9687973. Our registered office is c/o Squire Patton Boggs (UK) LLP (Ref:Csu) Rutland House, Edmund Street, Birmingham, England, B3 2JR.

Kim Technologies is made up of different legal entities and this Privacy Policy applies to the whole group, so when we mention "Kim Technologies", "we", "us" or "our" in this Privacy Policy we are referring to the relevant company in the Kim Technologies group responsible for processing your data. Kim Technologies Limited is responsible for the Kim Platform and as such is the controller responsible for your personal data in relation to your use of the Kim Platform.

b. This Policy applies to information we collect about in relation to the Kim Platform.

### 2. The information we collect about you

When you do business with us, we collect the following personal information from you:

- a. Name;
- b. Email address;
- c. Telephone number; and
- d. Work content stored on the Kim Platform, which may contain personal information.

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.

### 3. How we will use the information about you

We will only use your personal data when the law allows us to. Most commonly, we gather this information to allow us to provide the Kim Platform requested and/or perform a contract with you. The relevant information is then used by us to communicate with you relating to the Kim Platform.

We may also use your personal data:

- a) 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 e.g. to keep our records updated, to study how customers use our products/services, to administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance and support), and



b) Where we need to comply with a legal obligation e.g. notifying you about changes to our terms or in appropriate circumstances, of a data breach.

#### **4. Cookies and other information-gathering technologies**

a. Our Kim Platform website uses cookies. Cookies are text files placed on your computer to collect standard Internet log information and visitor behaviour information. These cookies allow us to distinguish you from other users of the website which helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

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 Kim Platform website may become inaccessible or not function properly.

b. For more information on which cookies we use and how we use them, see our Cookie Policy.

#### **5. How we protect your information**

a. In performing our obligations under this Policy we shall comply with all applicable law, including the Data Protection Act 2018, the General Data Protection Regulation ((EU) 2016/679)), and the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019 (SI 2019/419).

b. We will use any personal data you give us under this Policy to:

- Manage how you use the Kim Platform;
- Meet our obligations under this Policy;
- Contact you to see if you would like to take part in our customer research;
- Contact you about our other products and services and those of others which we think you will be interested in unless you have indicated that you do not wish to be contacted.

If we do contact you in this way, we will try to speak to the relevant person in your organisation, and we may contact you directly, or use other organisations which we have hired to contact you for us.

c. We may give information to other companies in our group of companies, our licensors and contractors, and other organisations described in relevant documents so far as required to ensure we can provide you with the Kim Platform in your contract with us or to follow up your enquiry.

d. If at any time you do not want us to use such personal information in the way set out in this Policy, please call us.

e. We will use all reasonable efforts to safeguard your personal information. 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, suppliers and other third parties (e.g. to whom we may choose to sell, transfer or merge parts of our business or our assets) 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.



However, you should be aware that the use of the Internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal information which is transferred from you or to you via the Internet.

f. 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.

## **6. Overseas transfers**

Kim Platform customers may choose the location of the hosting of their data in the UK, EU or US. The information you provide may be processed in countries outside your chosen hosting location that do not have similar protections in place regarding your data and restrictions on its use as set out in this Policy. An example is a potential processing of your personal data by our subsidiary Kim Technologies LLC, based in the United States of America. However, we will take steps to ensure adequate protections are in place to ensure the security of your information. For example, we ensure your personal data is protected by requiring all our group companies to follow the same rules when processing your personal data. Also, where we use certain service providers, we may use specific contracts approved by the UK and European Commission which give personal data the same protection it has in the UK and Europe.

## **7. Your legal rights**

You have the right to:

a. **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. 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 or refuse to comply if your request is clearly unfounded, repetitive or excessive.

If you would like a copy of some or all of your personal information, please send an email to [hello@ask.kim](mailto:hello@ask.kim) or a letter to our registered office address set out above. 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.



b. **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.

c. **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.

d. **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.

e. **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.

f. **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.

g. **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.

## 8. Your consent

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.

## 9. Changes to Privacy Policy or to your personal information

We keep our Privacy Policy under regular review. If we change our Privacy Policy we will post the updated version on this page, so that you may be aware of the information we collect and how we use it at all times. This Privacy Policy was last updated in February 2022.



We want to ensure that your personal information is accurate and up to date. If any of the information that you have provided to Kim Technologies changes, for example if you change your email address or name, please let us know the correct details by sending an email to our [hello@ask.kim](mailto:hello@ask.kim), or send a letter to our registered office address set out above. You may ask us, or we may ask you, to correct information you or we think is inaccurate, and you may also ask us to remove information which is inaccurate.

#### **10. Contact details**

We welcome your views about our Kim Platform website and our Kim Platform Privacy Policy. If you would like to contact us with any queries or comments please send an email to [hello@ask.kim](mailto:hello@ask.kim) or send a letter to Kim Technologies Limited, c/o Squire Patton Boggs (Uk) Llp (Ref:Csu) Rutland House, Edmund Street, Birmingham, England, B3 2JR.

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](http://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.

#### **Links to other websites**

Our Kim Platform website may contain links to other websites, which we are not responsible for. This Kim Platform Product Privacy Policy applies only to this website, so when you access links to other websites you should read their own privacy policies.

#### **Further information**

If you have any questions relating to our Kim Platform Privacy Policy, please email them to: [hello@ask.kim](mailto:hello@ask.kim)

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