



Privacy Policy

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1. Document Control

This document is subject to version control as indicated by the version number and date on the document. The owner is responsible for the maintenance of this document, for ensuring that it is current and reflective of the processes in this area and for ensuring that it is subject to regular review. All changes to this document must be approved and details entered in the amendment history below.

Amendment History

Date of Amendment	Details of Amendment	New Version Number	Authorised By
09 March 2022	Initial Release	1.0	Chief Operations Officer

2. Privacy Notice

This privacy notice for Kinsetsu Limited ("**Company**," "**we**," "**us**," or "**our**"), describes how and why we might collect, store, use, and/or share ("**process**") your information when you use our services ("**Services**"), such as when you:

- Visit our website at <http://www.kinsetsu.co.uk/privacy>, that links to this privacy notice
- Download and use our application(s), such as our mobile application — kcare, or any other application of ours that links to this privacy notice
- Engage with us in other related ways — including any sales, marketing, or events

Questions or concerns? Reading this privacy notice will help you understand your privacy rights and choices. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at privacy@kinsetsu.co.uk.

3. Summary of Key Points

This summary provides key points from our privacy notice.

- **What personal information do we process?** When you visit, use, or navigate our Services, we may process personal information depending on how you interact with Kinsetsu Limited and the Services, the choices you make, and the products and features you use.
- **Do we process any sensitive personal information?** We do not process sensitive personal information.

- **Do you receive any information from third parties?** We do not receive any information from third parties.
- **How do you process my information?** We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent. We process your information only when we have a valid legal reason to do so.
- **In what situations and with which parties do we share personal information?** We may share information in specific situations and with specific third parties.
- **How do we keep your information safe?** We have organisational and technical processes and procedures in place to protect your personal information. However, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information.
- **What are your rights?** Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal information. We will consider and act upon any request in accordance with applicable data protection laws.

4. What information do we collect?

Personal information you disclose to us

We collect personal information that you voluntarily provide to us when you express an interest in obtaining information about us or our products and Services, when you participate in activities on the Services, or otherwise when you contact us.

Personal Information Provided by You. The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make, and the products and features you use. The personal information we collect may include the following:

- names
- phone numbers
- passwords
- usernames
- job titles
- email addresses
- mailing addresses
- company name

Sensitive Information. We do not process sensitive information.

Social Media Login Data. We may provide you with the option to register with us using your existing social media account details, like your Facebook, Twitter, or other social media account.

Application Data. If you use our application(s), we also may collect the following information if you choose to provide us with access or permission:

- *Geolocation Information.* We may request access or permission to track location-based information from your mobile device, either continuously or while you are using our mobile application(s), to provide certain location-based services. If you wish to change our access or permissions, you may do so in your device's settings.
- *Mobile Device Access.* We may request access or permission to certain features from your mobile device, including your mobile device's bluetooth, camera, and other features. If you wish to change our access or permissions, you may do so in your device's settings.

This information is primarily needed to maintain the security and operation of our application(s), for troubleshooting, and for our internal analytics and reporting purposes.

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

Information automatically collected

Some information — such as your Internet Protocol (IP) address and/or browser and device characteristics — is collected automatically when you visit our Services.

We automatically collect certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services, and other technical information. This information is primarily needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies.

The information we collect includes:

- *Log and Usage Data.* Log and usage data is service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use our Services and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type, and settings and information about your activity in the Services (such as the date/time stamps associated with your usage, pages and files viewed, searches, and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called "crash dumps"), and hardware settings).
- *Device Data.* We collect device data such as information about your computer, phone, tablet, or other device you use to access the Services. Depending on the device used, this device data may include information such as your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model,

Internet service provider and/or mobile carrier, operating system, and system configuration information.

- *Location Data.* We collect location data such as information about your device's location, which can be either precise or imprecise. How much information we collect depends on the type and settings of the device you use to access the Services. For example, we may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address). You can opt out of allowing us to collect this information either by refusing access to the information or by disabling your Location setting on your device. However, if you choose to opt out, you may not be able to use certain aspects of the Services.

5. How do we process your information?

We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent.

We process your personal information for a variety of reasons, depending on how you interact with our Services, including:

- **To deliver and facilitate delivery of services to the user.** We may process your information to provide you with the requested service.
- **To request feedback.** We may process your information when necessary to request feedback and to contact you about your use of our Services.
- **To identify usage trends.** We may process information about how you use our Services to better understand how they are being used so we can improve them.
- **To save or protect an individual's vital interest.** We may process your information when necessary to save or protect an individual's vital interest, such as to prevent harm.

6. What legal bases do we rely on to process your information?

We only process your personal information when we believe it is necessary and we have a valid legal reason (i.e., legal basis) to do so under applicable law, like with your consent, to comply with laws, to provide you with services to enter into or fulfil our contractual obligations, to protect your rights, or to fulfil our legitimate business interests.

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on in order to process your personal information. As such, we may rely on the following legal bases to process your personal information:

- **Consent.** We may process your information if you have given us permission (i.e., consent) to use your personal information for a specific purpose. You can withdraw your consent at any time..
- **Performance of a Contract.** We may process your personal information when we believe it is necessary to fulfil our contractual obligations to you, including providing our Services or at your request prior to entering into a contract with you.
- **Legitimate Interests.** We may process your information when we believe it is reasonably necessary to achieve our legitimate business interests and those interests do not outweigh your interests and fundamental rights and freedoms. For example, we may process your personal information for some of the purposes described in order to:
 - Analyse how our services are used so we can improve them to engage and retain users
 - Understand how our users use our products and services so we can improve user experience
- **Legal Obligations.** We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.
- **Vital Interests.** We may process your information where we believe it is necessary to protect your vital interests or the vital interests of a third party, such as situations involving potential threats to the safety of any person.

7. When and with whom do we share your personal information?

We may share information in specific situations described in this section and/or with the following third parties.

We may need to share your personal information in the following situations:

- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

8. Do we use cookies and other tracking technologies?

We may use cookies and other tracking technologies to collect and store your information.

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Notice.

9. How do we handle your social logins?

If you choose to register or log in to our services using a social media account, we may have access to certain information about you.

Our Services offer you the ability to register and log in using your third-party social media account details (like your Facebook or Twitter logins). Where you choose to do this, we will receive certain profile information about you from your social media provider. The profile information we receive may vary depending on the social media provider concerned, but will often include your name, email address, friends list, and profile picture, as well as other information you choose to make public on such a social media platform.

We will use the information we receive only for the purposes that are described in this privacy notice or that are otherwise made clear to you on the relevant Services. Please note that we do not control, and are not responsible for, other uses of your personal information by your third-party social media provider. We recommend that you review their privacy notice to understand how they collect, use and share your personal information, and how you can set your privacy preferences on their sites and apps.

10. How long do we keep your information?

We keep your information for as long as necessary to fulfil the purposes outlined in this privacy notice unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). No purpose in this notice will require us keeping your personal information for longer than 2 years.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

11. How do we keep your information safe?

We aim to protect your personal information through a system of organizational and technical security measures.

We have implemented appropriate and reasonable technical and organisational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

12. What are your privacy rights?

In some regions, such as the European Economic Area (EEA) and United Kingdom (UK), you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time.

In some regions (like the EEA and UK), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information.

Withdrawing your consent: If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us.

However, please note that this will not affect the lawfulness of the processing before its withdrawal, nor will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

Cookies and similar technologies: Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Services.

If you have questions or comments about your privacy rights, you may email us at privacy@kinsetsu.co.uk.

13. Controls for do-not-track features

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognising and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted

that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

14. Do we make updates to this notice?

We may update this privacy notice from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

15. How can you contact us about this notice?

If you have questions or comments about this notice, you may contact our Data Protection Officer (DPO) by email at privacy@kinsetsu.co.uk, by phone at +4428 95 219091, or by post to:

Data Protection Officer
Kinsetsu Limited
Unit A4 Harbour Court
Belfast, Antrim BT3 9HB
United Kingdom

16. How can you review, update, or delete the data we collect from you?

Based on the applicable laws of your country, you may have the right to request access to the personal information we collect from you, change that information, or delete it in some circumstances. To request to review, update, or delete your personal information,