

NOUMI APP PRIVACY STATEMENT

1 Who we are and who this Privacy Statement applies to

- 1.1 This Privacy Statement is provided by Noumi Digital Limited ("**we**", "**our**" or "**us**"). We are a 'controller' for the purposes of the UK General Data Protection Regulation (EU) 2016/679 and the UK's Data Protection Act 2018 (collectively referred to as the "**Data Protection Laws**"). We take your privacy very seriously. We ask that you read this Privacy Statement carefully, as it contains important information about our processing and your rights.
- 1.2 This Privacy Statement applies to the individuals ("**you**" and "**your**") that have created an account to use version [insert] of the 'Noumi' mobile application software ("**App**") developed by us. This Privacy Statement sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us in connection with your use of the App. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.
- 1.3 The appstore from which you download a copy of the App will implement its own privacy policy relating to personal data processed by the appstore in connection with your use of the appstore site, including the download of the App from the appstore.
- 1.4 You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues. Information about how to do this is available on its website at www.ico.org.uk.

2 How to contact us

- 2.1 If you have any questions about this Privacy Statement, how we handle your personal data, or would like to exercise any of your legal rights (as set out at paragraph 10), please contact:

Addressee Data Protection Director

Registered address/principal place of business: Dalton House, 9 Dalton Square, Lancaster, England, LA1 1WD

Email: hello@noumi.app

3 Changes to this Privacy Statement

- 3.1 The latest version of this Privacy Statement can be found in the 'my account' section of the App.
- 3.2 We may change this Privacy Statement from time to time. We will alert you when any changes are made by email or via the App.

4 What personal data we collect, how we collect your personal data and why we process your personal data

4.1 We process the following types of personal data:

(a) **Identity data:** (i) full name; and (ii) email address.

(b) **Special categories of data:** none.

| PURPOSE | WHY DO WE NEED TO PROCESS YOUR PERSONAL DATA? | TYPES OF PERSONAL DATA PROCESSED |
|--|---|----------------------------------|
| Account registration | To identify you as a user of the App, create your account and grant you access to the App's various functionalities. However, if you log in to the App using your Apple account email address and you select the option to anonymise your Apple account email address, we will not be provided with your Apple account email address, but instead will be provided a random email address generated by Apple which Apple assigns to you. If you anonymise your Apple account email address, you will not be able to receive direct marketing from us | E-mail address |
| To contact you and manage the App | To identify you as a user of the App, create your account and grant you access to the App's various functionalities. To provide updates or informative notices, as set out in our end-user licence agreement (" EULA "). To activate the mechanisms necessary to detect and prevent unauthorised uses of the App. If we detect unauthorised uses of the App (as set out in our EULA), we may disable your access to or use of your account. | E-mail address |
| To manage or resolve your query or request | To manage and administer your use of the App, including responding to queries or complaints. | E-mail address |

| PURPOSE | WHY DO WE NEED TO PROCESS YOUR PERSONAL DATA? | TYPES OF PERSONAL DATA PROCESSED |
|---|--|----------------------------------|
| To send you direct marketing communications | To send you directing marketing to the extent you have opted in to receive direct marketing from us concerning products, services and offers available from our retailer partners. You can withdraw your consent to receiving direct marketing at any time e-mailing hello@noumi.app . | E-mail address |
| Optimisation of the Application | We monitor the way in which you use and interact with the Application. We use this information to develop and optimise the Application. | E-mail address |

5 How we are legally permitted to process your personal data

- 5.1 We are allowed to process your personal data for the purposes set out at paragraph 4 (what personal data we collect and why we process your personal data) based on the legal bases explained in the below table.
- 5.2 You can object to processing that we carry out on the grounds of legitimate interests. See paragraph 9 (Your rights) to find out how.

| PURPOSE | LEGAL BASIS |
|-----------------------------------|---|
| Account registration | In order for you to be able to create an account and register as a user of the App, we process your personal data as it is <u>necessary for the performance of a contract</u> , i.e. we would otherwise be unable to manage your registration, set up an account for you and provide you with access to the App. |
| To contact you and manage the App | We have a <u>legitimate interest</u> to contact you to provide updates or informative notices. We have a <u>legitimate interest</u> to carry out the necessary verifications to detect and prevent unauthorised uses of the App. This purpose of processing is required and beneficial for all parties. For example, it allows us to put in place measures to protect you against unauthorised use of your account by a third party and as it allows us to avoid unauthorised uses of the App. |

| PURPOSE | LEGAL BASIS |
|--|--|
| To manage or resolve your query or request | <p>We have a <u>legitimate interest</u> in responding to your queries.</p> <p>When your request is related to the exercise of your rights as set out at paragraph 10 (your legal rights), we are legally permitted to process your data for compliance with our legal obligations.</p> |
| To send you direct marketing | <p>We will only send you direct marketing communications if we have your <u>consent</u> and you have not opted out of receiving that marketing.</p> <p>You have the right to withdraw your consent at any time by e-mailing hello@noumi.app.</p> |
| Optimisation of the Application | <p>We have a <u>legitimate interest</u> to optimise and improve the Application. By processing this information we are able to create an Application that is more efficient and easier to use. This is beneficial for all parties.</p> |

6 How we keep your personal data secure

- 6.1 All personal data you provide to us is stored on our secure servers. Once we have received your information, we will use strict procedures and security features to try to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way. We aim to ensure that the level of security and the measures adopted to protect your personal data are appropriate for the risks presented by the nature and use of your personal data.

7 How long we keep your personal data

We shall retain your personal data until you instruct us to delete your account.

8 Organisations we may share your personal data with

- 8.1 We use processors to support our Application, for example, hosting providers and developers. Some of these service providers will process your personal data as part of the services they offer to us. We take steps to ensure that our service providers treat your data in accordance with the law, only use it in accordance with our contract with them and keep it secure. If you would like to know the names of our service providers, please contact us (see paragraph 2 (how to contact us)).
- 8.2 We may share your personal data with our group companies.

9 Transfer of personal data

- 9.1 Your personal information may be transferred to, and stored and processed in, one or more countries outside of the United Kingdom, including countries which do not provide equivalent protection for personal information. In these circumstances, we will take reasonable steps and

implement appropriate measures to ensure that your personal information is adequately protected in accordance with the law.

- 9.2 Please contact us (see paragraph 2 (how to contact us)) if you want further information on the specific safeguards used by us when transferring your personal information out of the United Kingdom.

10 Your legal rights

- 10.1 As a data subject, you have the following legal rights under the Data Protection Laws (set out in the table below) in relation to your personal data. You can exercise these rights free of charge, by contacting us (please see paragraph 2 (how to contact us)). We will respond to any rights that you exercise within a month of receiving the request unless the request is particularly complex (in which case, we will respond within three months).
- 10.2 We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.
- 10.3 Please be aware that there are exceptions and exemptions that apply to some of these rights, which we will apply in accordance with the Data Protection Laws.

| YOUR DATA PROTECTION RIGHTS | WHAT DOES THIS MEAN? |
|-----------------------------|---|
| Right to be informed | You have the right to be provided with clear, transparent and easily understandable information about how we use your personal data (and what your rights are). This is why we are providing you with this Privacy Statement. |
| Right of access | <p>You have the right to obtain access to your personal data processed by us, and certain other information (similar to that provided in this Privacy Statement).</p> <p>This is so you are aware and can check that we are using your information in accordance with Data Protection Laws.</p> <p>You may ask for:</p> <ul style="list-style-type: none">• a copy of your information;• details of the purpose for which it is being processed; |

| YOUR DATA PROTECTION RIGHTS | WHAT DOES THIS MEAN? |
|------------------------------|---|
| | <ul style="list-style-type: none"> • details of the recipients or classes of recipients to whom it is or could be disclosed (including if they are overseas and what protections they have in place); • the period for which it is held (or the criteria which determines the period for which it is held); • any information available about the source of the personal data; and • whether we carry out any automated decision-making or profiling, and where we do, information about the logic involved and the outcome or consequences of that decision or profiling. <p>To help us find the information, please give us as much information as possible about the type of personal data you would like to see.</p> |
| Right to rectification | <p>You are entitled to have your information corrected if it is inaccurate or incomplete. If you would like us to do this, please contact us (see paragraph 2 (how to contact us)).</p> |
| Right to erasure | <p>This is also known as the 'right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your information where:</p> <ul style="list-style-type: none"> • you do not believe that we need your personal data in order to process it for the purposes set out in this Privacy Statement; • if you gave us consent to process your personal data, you have withdrawn that consent and we cannot otherwise legally process your personal data; • you object to our processing and we do not have any legitimate interests that mean we can continue to process your personal data; or • your personal data has been processed unlawfully or have not been erased when it should have been. |
| Right to restrict processing | <p>You have rights to 'block' or suppress further use of your information. When processing is restricted, we can still store your information (but cannot use it further). You may request that we stop processing your personal data temporarily if:</p> |

| YOUR DATA PROTECTION RIGHTS | WHAT DOES THIS MEAN? |
|-------------------------------|--|
| | <ul style="list-style-type: none"> • you do not think your personal data is accurate. We will start processing again once we have checked whether or not the personal data is accurate; • the processing is unlawful but you do not want to erase your personal data; • we no longer need the personal data for our processing, but you need the personal data to establish, exercise or defend legal claims; or • you have objected to the processing because you believe that your interests should override our legitimate interests. |
| Right to data portability | You have rights in certain circumstances to obtain and reuse your personal data for your own purposes across different services. |
| Right to object to processing | You have the right to object to certain types of processing (including processing based on our legitimate interests and processing for direct marketing). |
| Right to withdraw consent | <p>If you have given your consent to anything we do with your personal data, you have the right to withdraw your consent at any time (although if you do withdraw consent, that does not mean anything we have done with your personal data with your consent up to that point is unlawful.)</p> <p>We make this withdrawal easy for you. Please e-mail hello@noumi.app if you wish to withdraw your consent at any time.</p> <p>We will also contact you via email to allow you to assess the consent which you have given us.</p> |

10.4 You may be entitled to compensation for damage caused by contravention of the Data Protection Laws.