

Overview – the key information you should be aware of

(A) **Who we are:** We are 15 Grams Limited, trading as 15grams. Our company number is 12014931. All references in this policy to "**15grams**", "**our**", "**us**" or "**we**" refer to 15 Grams Limited. All references in this policy to "our website" are a reference to the website owned by 15grams at www.15grams.co.uk

(B) **Our values and what this policy is for:** We value your privacy and want to be accountable and fair to you as well as transparent with you in the way that we collect and use your personal information. We also want you to know your rights in relation to your information.

In line with these values, this privacy policy tells you what to expect when we collect and use personal information about you. We have tried to make it easy for you to navigate so you can find the information that is most relevant to you and our relationship with you.

We are always looking to improve the information we provide to our customers and contacts so if you have any feedback on this privacy policy, please let us know using our contact details in section 12.

(C) **Who this policy applies to:** This policy applies to:

1. Visitors to our website
2. Visitors to our stores who have signed up to loyalty rewards
3. People who contact us with enquiries and to make bookings
4. Our suppliers and employees of our suppliers.

(D) **What this policy contains:** This privacy policy describes the following important topics relating to your information.

1. How we obtain your personal information
2. Collection of your personal information and how we use it

3. Our legal basis for using your personal information
4. How and why we share your personal information
5. How long we store your personal information
6. Your rights
7. Marketing
8. Where we may transfer your personal information
9. Risks and how we keep your personal information secure

10. Links to other websites
11. Changes to this privacy policy
12. Further questions and how to make a complaint

(E) **Your rights to object:** You have various rights in respect of our use of your personal information as set out in section 6. Two of the fundamental rights to be aware of are that you may:

1. ask us to stop using your personal information for direct-marketing purposes. If you exercise this right, we will stop using your personal information for this purpose.
2. Ask us to consider any valid objections which you have to our use of your personal information where we process your personal information on the basis of our, or another person's, legitimate interest.

You can find out more information in section 6

(F) **What you need to do and your confirmation to us:** Please read this privacy policy carefully to understand how we handle your personal information. By engaging with us in the ways set out in this privacy policy, you confirm that you have read and understood the entirety of this privacy policy, as it applies to you.

The detail – the key information you should be aware of

1. How we obtain your personal information

1.1 You may provide us with your personal information voluntarily, for instance, when contacting us to make a booking or with an enquiry.

1.2 You may give us personal information about yourself by using the online forms provided on our website, purchasing items or contacting us by phone, email or other means. This includes, for example, where you provide your personal information to us in order to receive information or services from us. If you are a supplier, you may also give us personal information about you when you are offering or providing services to us.

1.3 We also receive information about you from third parties such our clients, partners, suppliers or via websites which you visit, which we refer to as "third party sources" or "suppliers" throughout this policy.

2. Collection of your personal information and how we use it

Please go to the section or sections below that best describes our relationship with you to find out the information that we collect about you and how we use this information. We refer to this as "personal information" throughout this policy.

2.1 *Visitors to our website*

(a) What personal information we collect about you

We, or third parties on our behalf, may collect and use any of the following information about you:

- (i) your name;
- (ii) your email address
- (iii) any updates to information provided to us
- (iv) your postal address
- (v) the following information created and recorded automatically when you visit our website:

(A) **Technical information.** This includes: the Internet protocol (IP) address used to connect your computer to the internet address; device ID; the website address and country from which you access information; the files requested; browser type and version; browser plug-in types and versions; operating system; and platform. We use this personal information to administer our website, to measure the efficiency of our systems and to undertake an analysis on the locations from which people access our

webpages;

(B) **Information about your visit and your behaviour on our website** (for example, the pages that you click on). This may include the website you visit before and after visiting our website (including date and time), time and length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, traffic data, location data, weblogs and other communication data and information provided when requesting further service or downloads; and

(C) **Cookie information.** Our website uses cookies, which are small files placed on your internet browser when you visit our website. We use cookies in order to offer you a more tailored experience in the future, by understanding and remembering your particular browsing preferences.

Where we use cookies on our website, you may block these at any time. To do so, you can activate the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies), you may not be able to access all or parts of our website or to use all the functionality provided through our website.

For detailed information on the cookies we use and the purposes for which we use them, please refer to our cookies policy.

(b) How we use your personal information

We will collect, use and store the personal information listed above for the following reasons:

(i) to allow you to access and use our website

(ii) to receive enquiries or requests from you through the website about our products and services

(iii) for improvement and maintenance of our website and to provide technical support for our website

(iv) to ensure the security of our website

(v) to recognise you when you return to our website, to store information about your preferences, and to allow us to customise the website according to your individual interests

(vi) to evaluate your visit to the website and prepare reports or compile statistics to understand the type of people who use our website, how they use our website and to make our website more intuitive. Such details will be anonymised as far as reasonably possible and you will not be identifiable from the information collected.

2.2. *Visitors to our stores who have signed up to loyalty rewards*

(a) We, or third parties on our behalf, may collect and use any of the following information about you:

- (i) your telephone number
- (ii) your email address
- (iii) information provided when you correspond with us
- (iv) any updates to information provided to us.
- (v) your name

(b) How we use your personal information

We will collect, use and store the personal information listed above for the following reasons:

- (i) to track purchases of our products in store to enable discounts and promotions based on purchase values. We may process your personal information for these purposes where it is in our legitimate interests for client services purposes. This information may only be used for internal loyalty promotional marketing purposes if opted in.

2.3. *People who contact us with enquiries*

(a) We, or third parties on our behalf, may collect and use any of the following information about you:

- (i) your name

- (ii) your postal address
- (iii) your email address
- (iv) your telephone number
- (v) information provided when you correspond with us
- (vi) any updates to information provided to us.

(b) How we use your personal information

We will collect, use and store the personal information listed above for the following reasons:

(i) to deal with any enquiries or issues you have about our business and services, including any questions you may have about how we collect, store and use your personal information, or any requests made by you for a copy of the information we hold about you. We may process your personal information for these purposes where it is in our legitimate interests for client services purposes.

2.4 *Our suppliers and employees of our suppliers*

(a) We, or third parties on our behalf, may collect and use any of the following

information about you:

- (i) your name;
- (ii) work contact information (phone number, postal address, mailing address, email address);
- (iii) your job title;
- (iv) information provided when you correspond with us; and
- (v) any updates to information provided to us.

(b) How we use your personal information

We will collect, use and store the personal information listed above for the following reasons:

- (i) to enable us to receive and manage services from you (including supplier due diligence, payment and expense reporting and financial audits); and
- (ii) for background checks required by law.

(c) Source of personal information. We may receive some of your personal information from third party sources, such as your employer or your employer's company website. We may also collect this personal information from publicly-available sources, such as LinkedIn.

2.4 Whatever our relationship with you is, we also collect, use and store your personal information for the following additional reasons:

(a) to deal with any enquiries or issues you have about how we collect, store and use your personal information, or any requests made by you for a copy of the information we hold about you. If we do not have a contract with you, we may process your personal information for these purposes where it is in our legitimate interests for customer services purposes;

(b) for internal corporate reporting, business administration, ensuring adequate insurance coverage for our business, ensuring the security of company facilities, research and development, and to identify and implement business efficiencies. We may process your personal information for these purposes where it is in our legitimate interests to do so;

(c) to comply with any procedures, laws and regulations which apply to us – this may include where we reasonably consider it is in our legitimate interests or the legitimate interests of others to comply, as well as where we are legally required to do so; and

(d) to establish, exercise or defend our legal rights – this may include where we reasonably consider it is in our legitimate interests or the legitimate interests of others, as well as where we are legally required to do so.

2.5 Further processing

We will not use your personal information in any way that is incompatible with the purposes set out in this section 2. Please contact us using the details in section 12. If you want further information on the analysis we will undertake to establish if a new use of your personal information is compatible with these purposes.

3. Legal basis for use of your personal information

3.1 We consider that the legal bases for using your personal information as set out in this privacy policy are as follows:

(a) our use of your personal information, including as set out at section 2.1 is necessary to perform our obligations under any contract with you (for example, to comply with the terms of use of our website which you accept by browsing our website and/or to comply with any contract to provide services to or receive services from you or your employer);

(b) our use of your personal information is necessary for complying with our legal obligations; and

(c) where (a) and (b) do not apply, our use of your personal information is necessary for our legitimate interests or the legitimate interests of others. Our legitimate interests are to:

(i) to operate our website

(ii) run, grow and develop our business

(iii) select appropriately skilled and qualified suppliers

(iv) marketing, market research and business development

(v) provide services to our customers, make and receive payment and provide customer services

(vi) for internal administrative purposes.

We have carried out a balancing test and we believe that we have a legitimate business interest to use and share your personal data (in compliance with this privacy policy and subject to your various rights as set out in this privacy policy) for the purpose of providing our services and running our business. We do not deem this legitimate interest to be detrimental to you. You can ask us for information on this balancing test by using the contact details at section 12.

3.2 If we rely on your consent for us to use your personal information in a particular way, such as for direct marketing purposes, but you later change your mind, you may withdraw your consent by contacting us at info@15grams.co.uk and we will stop doing so.

4. How and why we share your personal information with others

4.1 We will share some personal information with the following third parties or categories of third parties where it is in our legitimate interests to do so:

(a) our service providers and sub-contractors, including but not limited to payment processors, suppliers of technical and support services, insurers, and hosting and cloud service providers;

(b) companies that assist us in our marketing, advertising and promotional activities;

(c) analytics and search engine providers that assist us in the improvement and optimisation of our website; and

(d) our point of sale and reservation system software providers, some of whom are headquartered in the US, which store your personal data globally, in order to assist us in providing the Services and contacting you.

We will always ensure that any third parties with whom we share your personal information are subject to privacy and security obligations consistent with this privacy policy and applicable laws. We will require any such third-party service provider to notify us if they become unable to satisfy these privacy and security obligations, and we will take reasonable steps to stop and remediate unauthorised or non-compliant processing by any such third-party service provider upon becoming aware of such processing.

4.2 We will also disclose your personal information to third parties:

(a) where it is in our legitimate interests to do so to run, grow and develop our business:

(i) if we sell or buy any business or assets, we may disclose your personal information to the prospective seller or buyer of such business or assets;

(ii) if substantially all of 15grams or any of its affiliates' assets are acquired by a third party, in which case personal information held by 15grams will be one of the

transferred assets;

(b) if we are under a duty to disclose or share your personal information in order to comply with any legal obligation, any lawful request from government or law enforcement officials and as may be required to meet national security or law enforcement requirements or prevent illegal activity;

(c) in order to enforce or apply our terms and conditions or any other agreement or to respond to any claims, to protect our rights or the rights of a third party, to protect the safety of any person or to prevent any illegal activity; or

(d) to protect the rights, property, or safety of 15grams, our staff, our clients or other persons. This may include exchanging personal information with other organisations for the purposes of fraud protection and credit risk reduction.

4.3 We may also disclose and use anonymised, aggregated reporting and statistics about users of our website or our goods and services for the purpose of internal reporting or reporting to other third parties, and for our marketing and promotion purposes.

4.4 Save as expressly detailed above, we will never share, sell or rent any of your personal information to any third party without notifying you and, where necessary, obtaining your consent. If you have given your consent for us to use your personal information in a particular way, but later change your mind, you should contact us and we will stop doing so.

5. How long we store your personal information

5.1 We keep your personal information for no longer than necessary for the purposes for which the personal information is processed. The length of time we retain personal information for depends on the purposes for which we collect and use it and/or as required to comply with applicable laws and to establish, exercise or defend our legal rights.

6. Your rights

6.1 You have certain rights in relation to your personal information. If you would like further information in relation to these or would like to exercise any of them, please contact us via email at info@15grams.co.uk at any time. You have the following rights:

(a) **Right of access.** You have a right of access to any personal information we hold about you. You can ask us for a copy of your personal information; confirmation whether your personal information is being used by us; details about how and why it is being used; and details of what safeguards are in place if we transfer your information outside of the European Economic Area ("EEA").

(b) **Right to update your information.** You have a right to request an update to any of your personal information which is out of date or incorrect.

(c) **Right to delete your information.** You have a right to ask us to delete any personal information which we are holding about you in certain specific circumstances. You can ask us for further information on these specific circumstances by contacting us at the email address above.

We will pass your request onto other recipients of your personal information unless that is impossible or involves disproportionate effort. You can ask us who the recipients are by contacting us at the email address above.

(d) **Right to restrict use of your information:** You have a right to ask us to restrict the way that we process your personal information in certain specific circumstances. You can ask us for further information on these specific circumstances by contacting us at the email address above.

(e) **Right to stop marketing:** You have a right to ask us to stop using your personal information for direct-marketing purposes. If you exercise this right, we will stop using your personal information for this purpose.

(f) **Right to data portability:** You have a right to ask us to provide your personal information to a third party provider of services.

This right only applies where we use your personal information on the basis of your consent or performance of a contract, and where our use of your information is carried out by automated means.

(g) **Right to object.** You have a right to ask us to consider any valid objections which you have to our use of your personal information where we process your personal information on the basis of our or another person's legitimate interest.

6.2 We will consider all such requests and provide our response within a reasonable period (and in any event within one month of your request unless we tell you we are entitled to a longer period allowed by applicable law). Please note, however, that certain personal information may be exempt from such requests in certain circumstances, for example if we need to keep using the information to comply with our own legal obligations or to establish, exercise or defend legal claims.

6.3 If an exception applies, we will tell you this when responding to your request. We may request you provide us with information necessary to confirm your identity before responding to any request you make.

7. Marketing

7.1 We may collect and use your personal information for undertaking marketing by email, telephone and post.

7.2 We may send you certain marketing communications (including electronic

marketing communications to existing customers) if it is in our legitimate interests to do so for marketing and business development purposes.

7.3 However, we will always obtain your consent to direct marketing communications where we are required to do so by law and if we intend to disclose your personal information to any third party for such marketing.

7.4 If you wish to stop receiving marketing communications, you can contact us by email at info@15grams.co.uk.

7.5 Where we may transfer your personal information

7.6 Your personal information may be used, stored and/or accessed by staff operating outside the EEA working for us or our suppliers, including in Australia, Canada, USA, China, Singapore, Japan, South Korea, Hong Kong, India and Brazil. Further details on to whom your personal information may be disclosed are set out in section 4.

7.7 If we provide any personal information about you to any such non-EEA members supplier, client or partner, we will take appropriate measures to ensure that the recipient protects your personal information adequately in accordance with this privacy policy. These measures may include the following permitted in Articles 45 and 46 of the General Data Protection Regulation:

7.8 in the case of US based entities, entering into European Commission approved standard contractual arrangements with them, or ensuring they have signed up to the EU-US Privacy Shield (see further <https://www.privacyshield.gov/welcome>); or

7.9 in the case of entities based in other countries outside the EEA, entering into European Commission approved standard contractual arrangements with

them.

7.10 Further details on the steps we take to protect your personal information, in these cases is available from us on request by contacting us by email at info@15grams.co.uk at any time.

8. Risks and how we keep your personal information secure

8.1 The main risk of our processing of your personal information is if it is lost, stolen or misused. This could lead to your personal information being in the hands of someone else who may use it fraudulently or make public information that you would prefer to keep private. For this reason, 15grams is committed to protecting your personal information from loss, theft and misuse. We take all reasonable precautions to safeguard the confidentiality of your personal information, including through use of appropriate organisational and technical measures.

8.2 Your personal information will be transferred over the internet. Although we make every effort to protect the personal information which you provide to us, the transmission of information over the internet is not completely secure. As such, you acknowledge and accept that we cannot guarantee the security of your personal information transmitted to our website and that any such transmission is at your own risk. Once we have received your personal information, we will use strict procedures and security features to prevent unauthorised access to it.

8.3 Where we have given you (or where you have chosen) a password which enables you to access your online account, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

9. Links to other websites

Our website may contain hyperlinks to websites that are not operated by us. These hyperlinks are provided for your reference and convenience only and do not imply any endorsement of the activities of such third-party websites or any association with their operators. This privacy policy only applies to the personal information that we collect or which we receive from third party sources, and we cannot be responsible for personal information about you that is collected and stored by third parties. Third

party websites have their own terms and conditions and privacy policies, and you should read these carefully before you submit any personal information to these websites. We do not endorse or otherwise accept any responsibility or liability for the content of such third party websites or third party terms and conditions or policies.

10. Changes to our privacy policy

We may update our privacy policy from time to time. Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by post or email. Please check back frequently to see any updates or changes to our privacy policy.

11. Further questions and how to make a complaint

11.1 If you have any queries or complaints about our collection, use or storage of your personal information, or if you wish to exercise any of your rights in relation to your personal information, please contact info@15grams.co.uk. We will investigate and attempt to resolve any such complaint or dispute regarding the use or disclosure of your personal information.

11.2 You may also make a complaint to the Information Commissioner's Office, or the data protection regulator in the country where you usually live or work, or where an alleged infringement of the General Data Protection Regulation has taken place. Alternatively, you may seek a remedy through the courts if you believe your rights have been breached.

12. If you have any feedback or questions please contact us on info@15grams.co.uk

The practices described in this privacy policy statement are current as of Jan 2023.