

# REKKI

## PRIVACY POLICY

### 1. About This Policy

This Privacy Policy describes how REKKI Limited (“REKKI” “we”, “us” and “our”) collects, uses, discloses, transfers, stores, retains or otherwise processes your information when you (whether you are a person acting as a sole proprietor or on behalf of another business entity) visit [Rekki.com](#) (our “**Website**”), apply or sign up for or use any of our services, or apply for a job with us. It forms part of our <[Buyer Licence Agreement](#)> for use of the REKKI Buyer App, [REKKI Insights](#) terms and our <[REKKI Supplier Service Terms](#)> for use of the Supplier App, REKKI Marketplace, REKKI Connect and other REKKI Services by you as a Buyer or Supplier, as the case may be (together, the “**App**”). Unless they are defined where they first appear in this policy, terms beginning with a capital letter in this Privacy Policy have the meanings in the Buyer Licence Agreement or REKKI Supplier Service Terms (as the case may be (together referred to as “**REKKI Service Terms**”). Our full details are stated in Clause 1 of Buyer Licence Agreement and REKKI Supplier Service Terms.

It is necessary for you to agree to the Buyer Licence Agreement or REKKI Supplier Service Terms (as the case may be), including the Privacy Policy, and for us to collect, process, share and store the personal data as described in order for us to be able to transact and communicate with you and interact with you via the App. REKKI is registered with the Information Commissioner’s Office (“**ICO**”) and our registration number is ZA218912.

This Privacy Policy describes what types of personal data are collected, the purposes for which they are collected and processed, the legal basis for that collection and processing and the organisations or types of organisations, if any, to which we may provide your personal data, your rights and how to contact us if you need to.

Our [contact details](#) are set out at the end of this policy.

Our App is not intended for persons under 18 years of age. No one under age 18 may provide any information to or on the App. We do not knowingly collect personal information from persons under 18. If you are under 18, do not use or provide any information to us via a contact form, the Website, on the App or through any of its features. If we learn we have collected or received personal information from a person under 18 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a person under 16, please contact us.

We are the controller in relation to the personal data processed in accordance with this policy under the Data Protection Act 2018 and the UK General Data Protection Regulation

(the “Act”), except where this policy or another organisation’s privacy policy explains that we are acting as a processor.

Our Website and the App may from time to time contain links to and from the websites of partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and we do not accept any responsibility or liability for those policies. Please check those policies and any relevant service terms and conditions before you submit any personal data to those websites. We are not responsible for the content of any other websites or services.

## **2. Information we collect about you**

We may collect, store and use the personal data described in the table in Annex A to this Privacy Policy, and process it for the purposes and on the legal basis specified in that table. Most commonly we will use your personal data in the following circumstances, as explained further in Clause 5 of this Privacy Policy:

- Where we need to perform an obligation under a contract with you, such as the Buyer Licence Agreement or REKKI Supplier Service Terms (as the case may be), or take steps at your request before agreeing a contract with you;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights that require the protection of personal data do not override those interests;
- Where we need to comply with a legal or regulatory obligation; and
- Where you have consented before the processing.

Personal data will be stored in accordance with Clause 5 of this Privacy Policy.

We aim to keep your personal information up-to-date, so you must promptly tell us by contacting us through [dataprotection@rekki.com](mailto:dataprotection@rekki.com) if you change your name, residential address or contact details.

We may process your personal data if:

- You or the business / company you work for apply to use the App.
- You or the business / company you work for use our App or the services provided through the App.
- You work for a buyer, a supplier or for someone who uses our services.
- You make contact with us in relation to a job vacancy, or apply for a job with us.

## **3. Information we collect from you or from a third party**

We may process your personal data that we have either obtained from you or obtained from somewhere else. Personal data which is not collected directly from you may be collected from information in the public domain, such as search engines, social media and advertising networks among others, but only to be used for the purposes and on the legal basis specified in Annex A.

#### **4. Cookies and other technologies**

Our Website and App use cookies and/or other similar technologies such as device-ID, in-App codes, pixel tags or web beacons to collect and store certain information. These typically involve pieces of information or code that a website transfers to or accesses from your computer hard drive or mobile device to store and sometimes track information about you. Cookies and similar technologies enable you to be remembered when using that computer or device to interact with websites and online services and can be used to manage a range of features and content as well as storing searches and presenting personalised content.

Our Website and App use cookies and similar technologies to distinguish you from other users. This helps us to provide you with a good experience when you use our Website and App and also allows us to improve our Website and App.

A number of cookies and similar technologies we use last only for the duration of your session and expire when you exit the Website or App. Others are used to remember you when you return to the Website or App and will last for longer but, in any case, no longer than 13 months.

We use these cookies and other technologies on the basis that they are necessary for the performance of a contract with you, or because using them is in our legitimate interests (where we have considered that these are not overridden by your rights), and, in some cases, where required by law, where you have consented to their use.

We use the following categories of cookies on the Website and any web browser versions of our App:

- **Necessary Cookies:** These cookies are required to ensure you can move around the App and use its features by, for example, remembering your login details.
- **Performance Cookies:** We use these to recognise and count the number of visitors and users and collect anonymised information about how users use the App. Our use of performance cookies includes our use of Google Analytics to help us understand how you arrive at and use the App.

- **Functionality Cookies:** These are used to recognise you when you return to our App. This enables us to personalise our content for you, greet you by name and remember choices you have made such as the country you visit the App from or language. These help us to provide you with an experience more appropriate to your selections and to make the visits more tailored and pleasant.

Please note that third parties (including, for example, providers of external services like web traffic analysis services) may also use cookies, over which we have no control. You should refer to their privacy policies or cookie policies for the relevant information about those cookies.

You can withdraw your consent to these cookies at any time through the following options:

- Google Analytics cookies may be removed by downloading the Google Analytics Opt-out Browser Add-on; and
- any other type of cookies may be removed through your browser settings.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. All browsers provide tools that allow you to control how you handle cookies by accepting, rejecting or deleting them. These settings are normally accessed via the 'settings', 'preferences' or 'options' menu of the browser you are using, but you could also look for a 'help' function or contact the browser provider. 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 the Website or App.

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

We are only permitted to use your data when we have a lawful basis to do so.

We will only collect, process, use, store and share your personal data where the Act allows us to do so. Specifically, we rely on the following lawful bases for processing, where specified in the table in Annex A:

- **Performance of a 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.
- **Compliance with a legal obligation** means processing your personal data where it is necessary for compliance with a legal obligation to which we are subject.

- **Legitimate Interest** means the processing is necessary for the purposes of the legitimate interests pursued by us or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data. 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 through [dataprotection@rekki.com](mailto:dataprotection@rekki.com).
- **Consent** means processing your personal data where you have signified your agreement by a statement or clear opt-in to processing for a specific purpose. Consent will only be valid if it is a freely given, specific, informed and unambiguous indication of what you want. You can withdraw your consent at any time by contacting us through [dataprotection@rekki.com](mailto:dataprotection@rekki.com).

You can find out more about the types of lawful basis that we will rely on to process your personal data in the table in Annex A to this Privacy Policy.

#### Automated decision making and profiling

We do not engage in profiling or automated processing of your personal data. Your personal data is not being analyzed or used in any automated way to make predictions about you.

#### **6. Who we give your information to**

We will not disclose your personal data to any third party, except as explained in the table in Annex A to this Privacy Policy.

In relation to chat and order information, we will not disclose to third parties that are not part of the chat any orders or chats that take place between users of the App in any way which would allow a user and/or the company they work for to be identified directly or indirectly. This means that no user will be able to see what another user that is not part of the chat orders in a way that would link it directly or indirectly to that user.

If some or all of our business is bought by a third party, personal data held by us will be transferred and may be disclosed to the prospective seller or buyer of such business under the same conditions as this Privacy Policy. This is necessary for the purposes of the legitimate interests pursued by us and the third party, and would not be overridden by your interests or fundamental rights and freedoms which require protection of personal data.

We may share certain aggregated and anonymised information (information relating to our users and orders they place that we combine so that it no longer identifies an individual user) with:

- other users of the App; and

- our current and prospective business partners.

No individual user or company can be identified from aggregate or anonymised information used for these purposes.

We may share certain order information with the artificial intelligence and generative artificial intelligence tools which underpin our services such as REKKI Connect, solely for the purposes and pursuant to the legal bases described in Section 5 above. The tools we use are listed in Annex A to this Privacy Policy. It is your responsibility to remove personal data or secure the consent of the relevant data subject in respect of any order information which you forward to us.

*Other disclosures we may make*

We will disclose your personal information to third parties:

- in the event that we sell or buy any business or assets, in which case we will disclose your personal data, if necessary, to the prospective seller or buyer of such business or assets subject to the terms of this privacy policy;
- if REKKI Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets; or
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our supply terms and other agreements with you or the company you work for; or to protect the rights and / or property of REKKI Limited and its group companies (e.g. in the context of litigation), or the rights, property and safety of our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction and to prevent cybercrime.

REKKI does not sell, trade, or rent personal data to any other third parties.

## **7. Where do we store your information?**

The data that we process in relation to you may be transferred to and stored at a destination outside the European Economic Area ("EEA") that may not be subject to equivalent data protection law. It may also be processed by staff situated outside the EEA who work for us or for one of our suppliers.

We may transfer your personal data outside of the EEA:

- in order to process it;
- in order to enable us to provide the services to and fulfil our contract with you or the company your work for;
- where we are legally required to do so; or
- in order to facilitate the operation of our group of businesses, where it is in our legitimate interests and we have concluded these are not overridden by your rights.

The data that we process in relation to you may be transferred to the USA on servers hosted by third party providers providing storage and data processing services. In this context, we use AWS cloud – a secure, private cloud platform. AWS participates in the EU-US Privacy Shield framework.

Where your information is transferred anywhere else outside the EEA, we will take all steps required by the Act to ensure that your data is subject to appropriate safeguards, such as relying on a recognised legal adequacy or other appropriate transfer mechanism, and that it is treated securely and in accordance with this privacy policy as provided by Article 46(2) and (3) of the Act.

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

All information you provide to us is processed on our secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our App, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data by using a level of security appropriate to the risk, we cannot guarantee the security of your data transmitted to our App; any transmission is at your own risk. Once we have received your information, we will use all reasonable endeavours to ensure that appropriate technical and organisational measures are in place to protect your personal data from unauthorised or unlawful processing and against accidental loss, destruction or damage.

Our Website may, from time to time, contain links to external sites. We are not responsible for the privacy policies or the content of such sites.

## **9. How long we keep your information**

We retain personal data received in relation to your use of the App for as long as you have

an account with us in order to meet our contractual obligations to you and for ten years after that to identify any issues and resolve any legal proceedings. We may also retain aggregate information beyond this time for research purposes and to help us develop and improve our services. You cannot be identified from aggregate information retained or used for these purposes.

If you apply for a job posted by us, the information we collect / you provide is used to determine whether you are a good match for the role posted and any future roles with us. We will hold on to your data for recruitment purposes for six months. If we are not currently able to offer you a position but would like to keep your details for longer, we will reach out for your consent first.

## **10. Your rights**

Under the Act, you have a number of rights. The first right is to receive confirmation as to whether or not any of your personal data is being processed and certain other information, as we have set out in this Privacy Policy.

The table in Annex B at the end of this Privacy Policy also explains the following rights which the Act gives you in relation to your personal data, and any exceptions to those rights:

- to be provided with a copy of your personal data held by us;
- to request the rectification of your personal data held by us, for instance to correct (or update) any personal data about you that is inaccurate (or out of date) or incomplete;
- to request that we restrict the processing of your personal data in certain circumstances (while we verify or investigate your concerns with this information, for example);
- to object to the further processing of your personal data, including the right to object to marketing;
- to request the erasure of your personal data held by us (e.g., if the personal data are no longer required in connection with the contractual relationship, or if you withdraw your consent, where applicable); to request that your provided personal data be moved to a third party or, where processing is automated and is necessary for the performance of a contract, to receive personal data, which you have provided to us, in a structured, commonly used and machine readable format.

You may opt out at any time from allowing further access by us to your location data by changing the privacy settings on your device or by emailing us at [dataprotection@rekki.com](mailto:dataprotection@rekki.com).



If you are using the mobile phone version of the App, you can also stop all information collection by un-installing the App. You may use the standard un-install processes as may be available for your mobile device.

If you would like us to delete your account, please use the “Delete Account” function in the app. On receiving such a request, we will delete or anonymise your personal data so that it no longer identifies you. To protect information from accidental or malicious destruction, we may maintain residual copies for a brief time period (generally several weeks). But, if you delete your account, your information and content will be unrecoverable after that time.

#### *Your right to withdraw consent:*

Where the processing of your personal information by us is based on consent, you have the right to withdraw that consent without detriment at any time by contacting us.

#### *How to exercise your rights*

You can also exercise the rights listed above at any time by contacting us at [dataprotection@rekki.com](mailto:dataprotection@rekki.com).

## **11. Complaints**

You can complain about our collection or processing of your personal data to us in accordance with the REKKI Service Terms.

You can also complain to the Information Commissioner’s Office if you consider there has been a breach of the Act in connection with your personal data.

## **12. Choice of Law**

This Privacy Policy is governed by English law and either of us can bring legal proceedings in the courts of England and Wales in relation to any dispute arising out of or in connection with this policy, except that you may bring proceedings in Northern Ireland or Scotland if you are resident there.

## **13. Changes to this policy**

We may amend this Privacy Policy. Any changes we may make to our Privacy Policy in the future will be posted on this page and on the App and made in accordance with provisions for changing the Buyer Licence Agreement or REKKI Supplier Service Terms (as the case may be). Any substantive changes we make to our privacy policy will be notified to you by e-mail.

This policy was last updated in January 2025.

**14. Contact us**

Our full details are:

REKKI Limited is incorporated in England with company number 07849223 and registered address Unit 3, NW Works, 135 Salusbury Road, London, NW6 6RJ.

We are registered as a controller with the Information Commissioner's Office (No. ZB274050).

We are contactable at [dataprotection@rekki.com](mailto:dataprotection@rekki.com).

**Annex A**

<b>Personal Data Collected</b>	<b>Purpose</b>	<b>Lawful Basis for Processing</b>
<ul style="list-style-type: none"> <li>● Your name.</li> <li>● The name and address of who you work for.</li> <li>● Your phone number and email address (these details may relate to your work or to you personally, depending on the nature of our relationship with you or the company that</li> </ul>	<ul style="list-style-type: none"> <li>● To manage and administer the App;</li> <li>● to enable you to use the App;</li> <li>● to check any order or other instructions given to us;</li> <li>● for training purposes;</li> <li>● to improve the quality of our customer service;</li> <li>● to process orders, invoices, payments and refunds</li> <li>● to deal with enquiries, applications, complaints and feedback from you;</li> <li>● to send you contractual notices;</li> <li>● to keep you informed about your activity relating to the App;</li> </ul>	<ul style="list-style-type: none"> <li>● performance of a contract <u>or to take steps before entering into a contract</u></li> <li>● compliance with a legal obligation</li> <li>● legitimate interests</li> </ul>

<p>you work for).</p> <ul style="list-style-type: none"> <li>● Information provided by you in the context of a job application</li> <li>● Information obtained from you or the person you work for relating to transactions with us involving you or the company you work for (for example: (i) conversations; (ii) details of goods, items, ingredients or services that you may order or receive orders for through the App; (iii) any images or other media shared through the App; and (iv) names of other users.</li> <li>● Financial information, details of any payment cards used and bank account numbers (we see last four digits only) and the expiration date of the payment card (no card information is being stored by REKKI on the App, as we use a third party payment provider for processing payments).</li> </ul>	<ul style="list-style-type: none"> <li>● to facilitate the creation of and to assist our efforts to secure your account through the App, including by allowing us to verify your identity.</li> <li>● to identify you as a user in our system and maintain a record of your transactions and interactions through the App.</li> <li>● to take steps in order to enter into any contract or carry out our obligations arising from any contract entered into between you or the company you work for and us including: <ul style="list-style-type: none"> <li>o supplying services, including <u>order processing</u>, reports on the purchases or sales you make and from or to whom, to you or the company you work for or receiving them from you or the company you work for, as the case may be;</li> <li>o providing you or the company you work for with the information and services you request from us;</li> <li>o where any additional Know Your Client or other due diligence information is required by external payments/credit provider in order to enter into any Additional Agreements;</li> <li>o administering your/your company's account with us;</li> <li>o notifying you about changes to our service;</li> <li>o entering into a contract of employment with you.</li> </ul> </li> </ul> <p>To disclose to third parties as follows:</p>	
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<ul style="list-style-type: none"> <li>• supporting documentation stating your name, date of birth and the proof of address.</li> </ul> <p>We may monitor, record, store and use any telephone, email or other communication.</p>	<ul style="list-style-type: none"> <li>• to comply with a current judicial proceeding, a court order or legal process served on us or our App, any request by any regulator who may have jurisdiction over us or for audit purposes and to meet obligations to any relevant regulatory authority or taxing authority;</li> <li>• to payment service provider(s) to process payments and refunds;</li> <li>• to selected providers of extended payment terms in relation to invoices payable by you, for the purpose of determining whether or not to agree to grant you extended payment terms, (such provider is currently: <ul style="list-style-type: none"> <li>◦ TWO B2B LTD (a company registered in England and Wales with company number 13078389); and TWO FINANCE LTD (a Company registered in England and Wales with company number 13622447) of 77 Cadogan Terrace, London, England, E9 5HP, trading as “Two”).</li> </ul> </li> <li>• to enforce this Privacy Policy or the REKKI Service Terms;</li> <li>• to agents and subcontractors, acting for us, to use for the purpose of operating the App;</li> <li>• our business partners, service providers and sub-contractors for the performance of any contract we enter into in relation to our App, <u>including providers of AI services that we access through secure application programming interfaces (APIs)</u>, such as: <ul style="list-style-type: none"> <li>◦ <u>Chat GPT by OpenAI. See <a href="#">EU privacy policy   OpenAI</a></u></li> <li>◦ <u>Gemini by Google. See <a href="#">Privacy Policy – Privacy &amp; Terms – Google</a></u></li> </ul> </li> </ul>	
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	<ul style="list-style-type: none"> <li>• our business partners, service providers and sub-contractors in relation to other dealings we have in the normal course of business with you or the person that you work for in relation to our services; and</li> <li>• our auditors, legal advisors and other professional advisors or service providers for any of the above purposes;</li> <li>• any member of REKKI group of companies, which means our subsidiaries, our ultimate holding company and its subsidiaries, or any employee thereof, who supports the processing of personal data under this policy for the purposes stated.</li> </ul>	
<p>Information about your device, mobile device or other item of hardware through which you access the Website or App and your visits to and use of the Website or App (including your device, operating system, length of visit, page views that you use)</p> <ul style="list-style-type: none"> <li>• Technical information, including establishing what device you have used to access the Website or App, the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and</li> </ul>	<ul style="list-style-type: none"> <li>• to analyse and improve the features offered on the App.</li> <li>• To ensure that content on the App is presented in the most effective manner for you and for your device;</li> </ul> <p>To disclose to third parties for:</p> <ul style="list-style-type: none"> <li>• To comply with a current judicial proceeding, a court order or legal process served on us or our App, any request by any regulator who may have jurisdiction over us or for audit purposes and to meet obligations to any relevant regulatory authority or taxing authority;</li> <li>• To enforce this Privacy Policy or the REKKI Service Terms;</li> </ul>	<ul style="list-style-type: none"> <li>• performance of a contract</li> <li>• legitimate interests</li> </ul>

<p>versions, operating system and platform.</p>		
<p>Information relating to your time taken to respond to questions, links you have clicked; and length of time you have spent on the App,</p> <ul style="list-style-type: none"> <li>Information about how you use the App, including when you stop using the App and when you are not using all the functions of the App.</li> </ul>	<ul style="list-style-type: none"> <li>To deal with enquiries, complaints and feedback from you;</li> <li>to analyse and improve the features offered on the App.</li> <li>administer the App and for internal operations, including product development, troubleshooting, data analysis, testing, research, statistical and survey purposes.</li> <li>analyse your use of the App and where you stop using or are not using all functions of the App, contact you through the in-App help chat.</li> <li>keep our App safe and secure through account verification.</li> <li>to improve our App to ensure that content is presented in the most effective manner for you and for your device.</li> <li>to allow you to explore suppliers on the platform or other services that you may have an interest in, or that will provide a business advantage for you/your business.</li> </ul> <p>To disclose to third parties for:</p> <ul style="list-style-type: none"> <li>To comply with a current judicial proceeding, a court order or legal process served on us or our App, any</li> </ul>	<ul style="list-style-type: none"> <li>performance of a contract</li> <li>compliance with a legal obligation</li> <li>legitimate interests</li> </ul>

	<p>request by any regulator who may have jurisdiction over us or for audit purposes and to meet obligations to any relevant regulatory authority or taxing authority;</p> <ul style="list-style-type: none"> <li>● To enforce this Privacy Policy or the REKKI Service Terms;</li> <li>● analytics and search engine providers that assist us in the improvement and optimisation of our App and subject to the cookie section of this policy.</li> </ul>	
<ul style="list-style-type: none"> <li>● Correspondence between you and us</li> <li>● Information about you that you give us by communicating with us by phone, by email, via our Website, via social media or otherwise. It includes personal data you give us or that we obtain when you use our Website, enquire about our services and App, or a job, or contact us to report a problem, or do any of these things on behalf of the person or company that you work for.</li> <li>● Other information relating to you which it is necessary for us to process in order to enter into or perform a contract with you or the company you work</li> </ul>	<ul style="list-style-type: none"> <li>● to manage and administer the Website and App;</li> <li>● to enable you to use the Website and App;</li> <li>● to deal with enquiries, applications, complaints and feedback from you;</li> </ul> <p>To disclose to third parties for:</p> <ul style="list-style-type: none"> <li>● To comply with a current judicial proceeding, a court order or legal process served on us or our App, any request by any regulator who may have jurisdiction over us or for audit purposes and to meet obligations to any relevant regulatory authority or taxing authority;</li> <li>● To enforce this Privacy Policy or the REKKI Service Terms;</li> </ul>	<ul style="list-style-type: none"> <li>● performance of a contract or to take steps before entering into a contract</li> <li>● compliance with a legal obligation</li> <li>● legitimate interests</li> </ul>

for.		
Details of your answers to Questions via the App	<ul style="list-style-type: none"> <li>● to conduct surveys</li> <li>● to manage and administer the App;</li> <li>● to enable you to use the App;</li> <li>● for statistical analysis;</li> <li>● to develop and improve the App;</li> </ul> <p>To disclose to third parties for:</p> <ul style="list-style-type: none"> <li>● To comply with a current judicial proceeding, a court order or legal process served on us or our App, any request by any regulator who may have jurisdiction over us or for audit purposes and to meet obligations to any relevant regulatory authority or taxing authority;</li> <li>● To enforce this Privacy Policy or the REKKI Service Terms;</li> <li>● to agents and subcontractors, acting for us, to use for the purpose of operating the App;</li> </ul>	<ul style="list-style-type: none"> <li>● performance of a contract</li> <li>● compliance with a legal obligation</li> <li>legitimate interests</li> </ul>
Records of any telephone, email or other communication with you	<ul style="list-style-type: none"> <li>● to improve the quality of our customer service.</li> </ul> <p>To disclose to third parties for:</p> <ul style="list-style-type: none"> <li>● To comply with a current judicial proceeding, a court order or legal process served on us or our App, any request by any regulator who may have jurisdiction over us or for audit purposes and to meet obligations to any relevant regulatory authority or taxing authority;</li> <li>● To enforce this Privacy Policy or the REKKI Service Terms;</li> </ul>	<ul style="list-style-type: none"> <li>● performance of a contract or to take steps before entering into a contract</li> <li>● compliance with a legal obligation</li> <li>● legitimate interests</li> </ul>



<p>Information in the public domain, such as search engines, social media and advertising networks among others</p>	<ul style="list-style-type: none"> <li>● to assess and verify the nature and scale of your business and involvement of any key personnel (e.g. an acclaimed chef) as described to us, the Payment Service Provider or any third party provider of extended payment terms.</li> </ul>	<ul style="list-style-type: none"> <li>● performance of a contract or to take steps before entering into a contract</li> <li>● compliance with a legal obligation</li> <li>● legitimate interests</li> </ul>
<p>Name, email address</p>	<ul style="list-style-type: none"> <li>● Direct marketing (e.g. mailing lists for newsletters);</li> <li>● Provide you with information about our services we feel may interest you or the company you work for, if you have given your consent to receiving marketing material from us.</li> <li>● for marketing analysis and to provide you with promotional update communications</li> </ul>	<ul style="list-style-type: none"> <li>● Consent</li> </ul>
<ul style="list-style-type: none"> <li>● Location data - we don't currently collect location data, but if we decide to do so in the future, the App will explicitly ask for your prior consent. Most mobile devices allow you to control or disable the use of location services for applications in the device's settings menu.</li> </ul>	<ul style="list-style-type: none"> <li>● to allow us to provide you with specialised features.</li> <li>● If you agree, it will be used to allow us to provide you with specialised features.</li> </ul>	<ul style="list-style-type: none"> <li>● Consent: the App will explicitly ask for your prior consent. Most mobile devices allow you to control or disable the use of location services for applications in the device's settings menu.</li> </ul>

## Annex B

You may exercise these rights at any time by contacting us through [dataprotection@rekki.com](mailto:dataprotection@rekki.com), as explained in paragraph 10 of the Privacy Policy.

<b>Rights</b>	<b>Exception</b>
<p><u>Right of Access</u>: To obtain from us confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, access to the personal data and the following information: (a) the purposes of the processing; (b) the categories of personal data concerned; (c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations; (d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period; (e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing; (f) the right to lodge a complaint with a supervisory authority; (g) where the personal data are not collected from the data subject, any available information as to their source; (h) the existence of automated decision-making, including profiling and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.</p>	
<p><u>Right to rectification</u>: to obtain from us without undue delay the rectification of inaccurate personal data concerning you.</p> <p>We must communicate to each recipient to whom the rectified personal data have been disclosed, unless this proves impossible or involves disproportionate effort.</p> <p>We shall inform you about those recipients if you request that information.</p>	
<p><u>Right to erasure</u>: to obtain from us the erasure of personal data concerning you without undue delay where:</p> <p>(a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;</p>	<p>Processing is necessary for</p> <p>(b) compliance with a legal obligation which requires processing by law to which the controller is subject or for the performance of a task carried out in</p>

<p>(c) you object to the processing based on legitimate interest where there are no overriding legitimate grounds for the processing;</p> <p>(d) the personal data have been unlawfully processed;</p> <p>(e) the personal data have to be erased for compliance with a legal obligation to which we are subject.</p> <p>We must communication to each recipient to whom the erased personal data have been disclosed, unless this proves impossible or involves disproportionate effort.</p> <p>We shall inform you about those recipients if you request that information.</p>	<p>the public interest or in the exercise of official authority vested in us; or</p> <p>(e) the establishment, exercise or defence of legal claims.</p>
<p><u>Right to request the restriction of processing concerning you:</u> to obtain from us restriction of processing where:</p> <p>(a) the accuracy of the personal data is contested by you, for a period enabling us to verify the accuracy of the personal data;</p> <p>(b) the processing is unlawful and you oppose the erasure of the personal data and request the restriction of its use instead;</p> <p>(c) we no longer need the personal data for the purposes of the processing, but it is required by you for the establishment, exercise or defence of legal claims;</p> <p>(d) you object to the processing based on legitimate interest pending the verification whether our legitimate grounds override yours.</p> <p>We must communication to each recipient to whom the restricted personal data have been disclosed, unless this proves impossible or involves disproportionate effort.</p> <p>We shall inform you about those recipients if you request that information.</p>	<p>Where processing has been restricted under this right, such personal data shall, with the exception of storage, only be processed:</p> <p>(a) with your consent; or</p> <p>(b) for the establishment, exercise or defence of legal claims; or</p> <p>(c) for the protection of the rights of another natural or legal person; or</p> <p>(d) for reasons of important public interest of the UK.</p>
<p><u>The right to data portability:</u> to receive the personal data concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from us, where:</p>	<p>That right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us.</p>

<p>(a) the processing is based on consent or is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract; and</p> <p>(b) the processing is carried out by automated means.</p> <p>You have the right to have the personal data transmitted directly from us to another controller, where technically feasible.</p> <p>The exercise of this right shall be without prejudice to the right to erasure.</p>	
<p><u>The right to object to processing:</u> to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on processing necessary for the purposes of the legitimate interests pursued by us or a third party (except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data), including profiling.</p>	<p>Where:</p> <p>(a) we demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject; or</p> <p>(b) for the establishment, exercise or defence of legal claims.</p>
<p><u>The right to ask us not to process your personal data for direct marketing purposes:</u> to object at any time to processing of personal data concerning you for such marketing.</p> <p>You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us through <a href="mailto:dataprotection@rekki.com">dataprotection@rekki.com</a>, as explained in paragraph 10 of the Privacy Policy.</p>	