

# PRIVACY POLICY

Ki Mobility is committed to protecting personal information and privacy. Where we collect your personal data, we act as a data controller of that information and have taken steps to ensure that we comply with our obligations under applicable data protection laws. We have prepared this policy to explain the ways in which we handle your personal data.

We always aim to provide complete and transparent information about how we process your personal data but reserve the right to update this Policy from time to time in order to accurately reflect changed circumstances or new regulatory requirements. However, if we make any substantive changes to this Policy then we will let you know.

## APPLICATION OF THIS POLICY

This Policy applies when you use our website, contact us via our website or through other means, or when you interact with us by participating in one of our competitions or other promotions, including when you register to receive updates, newsletters or other offers from us.

This Policy also applies to representatives of our trusted dealers and distributors as well as to employees, contractors or agents of any service providers or suppliers that we interact with during the ordinary course of conducting our business.

## COLLECTION OF PERSONAL DATA

In order to operate our business effectively we have to process the personal data of individuals that we interact and communicate with in the operation and administration of our business. We only process information that you or your employer provide to us and do not collect personal data from other third parties.

## TYPES OF PERSONAL DATA COLLECTED

Depending on the nature of your relationship with us, we may process the following categories of personal data:

- your name;
- your employer and job title;
- your contact details including but not limited to telephone number, fax number and email address.
- your IP address and location;
- your on-line browsing activities on our website;
- your preferences for receiving marketing communications from us and, where you participate in any of our competitions or promotions, information about your participation (such as any prizes won);
- information about you that is available in the public domain, such as information available from social media profiles and accounts;
- imagery and visual recordings of you, where such information is in the public domain or that you provide to us on specific occasions;
- details of your interest in and attendance of exhibitions, demonstrations or other events involving the promotion of our products and services; and
- information you provide in correspondence and communications with us, including any information provided through our website contact form.

We do not generally process special categories of personal data. In certain circumstances we may process limited amounts of special category health data in a manner purely incidental to other activities, but will never process information about your race, ethnicity, political opinions, sexual orientation or political and philosophical beliefs. To know more about how we collect and process health data, please read below.

## PURPOSES OF DATA PROCESSING

We process different categories of personal data for different reasons. Generally, we process your data in order to:

- operate and administer our business;
- process and respond to product related enquiries;
- process product orders, including arranging payment for and delivery of orders made;
- provide service and support;
- promote our business through marketing and advertising activities, including in arranging a product demonstration and in issuing updates, newsletters or other promotions;
- support our legal obligations and rights, including in conducting or defending legal claims; and
- make improvements to our products and website.

## LAWFUL BASIS OF DATA PROCESSING

In some circumstances we may process your data based on our legitimate interests in:

- supplying our products;
- improving our existing products and our website;
- complying with our legal obligations;
- handling enquiries and complaints;
- fulfilling our contractual obligations;
- advancing our business in marketing our products and services; and
- managing corporate transactions, where we intend to acquire a business or dispose of all or part of our own business.

In addition, in some cases we may process your data where necessary to enter into or perform a contract with you, or to comply with our legal and regulatory obligations.

Where we process your special category health data, then depending on the circumstances we will either do this on the basis that the information has been manifestly made public by you, or in all other cases where you have expressly consented to us processing your data. In any case where we rely on your consent to process data, then you can withdraw your consent at any time by getting in touch with us using the contact information provided below. However, please note that withdrawing your consent will not affect the legality of any processing of your data which has occurred prior to withdrawal.

## SHARING OF YOUR PERSONAL DATA

We may share your information with the following parties:

- other entities within our group of companies;
- our trusted partners, including our independent dealers and distributors;
- payment institutions;
- service providers that we use as part of our business infrastructure, for example providers of delivery, marketing or IT related services;
- regulatory authorities, law enforcement agencies and courts;
- in the event of a sale of our business or part of our business, the purchaser and its professional advisors; and
- our professional advisors.

No mobile information will be shared with third parties/affiliates for marketing/promotional purposes. All the above categories exclude text messaging originator opt-in data and consent; this information will not be shared with third parties.

## INTERNATIONAL TRANSFERS OF PERSONAL DATA

The information which we collect about you may be transferred outside of your country or region. Where the recipient is based in a jurisdiction that has not been deemed to provide adequate protection of your data, then we put in place specific contractual protections approved by the European Commission in order to ensure that your data is adequately protected. If you'd like to know more about those protections then they can be accessed [here](#).

## SECURITY OF YOUR INFORMATION

We have implemented appropriate technical and organisational measures to ensure that we are doing everything that we can be in order to protect the security of your data. We regularly review our internal policies, procedures and technical security to ensure that they remain appropriate to the risks of your data being compromised in any way.

## AUTOMATED DECISION MAKING

We do not conduct any automated decision making based on the information you provide.

## RETENTION OF PERSONAL DATA

We only keep your information for as long as necessary to achieve the purposes for which it was initially collected. Generally, information in relation to completed sales will be retained for 6 years after the date of sale, at which time it will be reviewed and if no longer necessary permanently deleted.

In some cases we may anonymise data for statistical purposes. Where we do this we ensure that you can no longer be identified by those data, meaning that it will no longer constitute personal data and can be retained for a longer period.

## YOUR RIGHTS IN CONNECTION WITH YOUR PERSONAL DATA

You have certain rights under data protection law in relation to your data which are listed below, although please note that not all of these apply in all circumstances:

1. **Right of access** - subject to certain exceptions, you have the right of access to your personal data that we hold.
2. **Right to rectify your personal information** - if you discover that the information we hold about you is inaccurate or incomplete, you have the right to have this information rectified (i.e. corrected).
3. **Right to be forgotten** - you may ask us to delete information we hold about you in certain circumstances. This right is not absolute and it may not be possible for us to delete the information we hold about you, for example, if we have an ongoing contractual relationship or are required to retain information to comply with our legal obligations.
4. **Right to restriction of processing** - in some cases you may have the right to have the processing of your personal information restricted. For example, where you contest the accuracy of your personal information, its use may be restricted until the accuracy is verified.
5. **Right to object to processing** - you may object to the processing of your personal information (including profiling) when it is based upon our legitimate interests. You may also object to the processing of your personal information for the purposes of direct marketing and for the purposes of statistical analysis.
6. **Right to data portability** - you have the right to receive, move, copy or transfer your personal information to another controller when we are processing your personal information based on consent or on a contract and the processing is carried out by automated means.

## ENQUIRIES AND COMPLAINTS

If you have any questions or concerns in relation to our use of your personal data, you can always contact us at [marketing@kimobility.com](mailto:marketing@kimobility.com).

If you are in the EU and would like to get in touch regarding our processing of your personal data, then you can also contact our appointed EU representative by writing with details of your enquiry to: Ki Mobility Portugal, LDA, Rua Santos Pousada, 157 4º andar sala 17, 4000-485 Porto.

If you are in the UK, we are registered as a data controller with the Information Commissioner's Office under registration number ZB019866. You have the right to complain to the ICO. You can contact the ICO by telephone at 0303 123 1113 or alternatively can write to them at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

If you are in Canada, you also have the right to complain to the Office of the Privacy Commissioner. You can contact them by telephone at 819 994 5444 or alternatively can write them at 30, Victoria Street Gatineau, Quebec K1A 1H3.

If you are in the US you may also find agencies with oversight on data protection at [www.usa.gov/privacy](http://www.usa.gov/privacy).

You may also have the right to complain to agencies in your country or agencies in other countries if you do not reside in any of these areas.