

BRIPPO LIMITED

PRIVACY POLICY

Brippo Limited ("**Brippo**", "**we**", "**our**", or "**us**") is committed to protecting and respecting your privacy.

1. THIS PRIVACY POLICY

This privacy policy sets out how we collect, store, process, transfer, share and use data that identifies or is associated with you ("**personal information**") when you use our website at www.brippo.com (the "**Site**"), use our online and in-store payments service or otherwise interact with us.

2. ABOUT US

Brippo Limited is the data controller of the personal information we hold about you. We are a company registered in England and Wales under company no. 14493682 and our registered office is 71-75 Shelton Street, Covent Garden, London WC2H 9JQ.

We are registered as a data controller with the Information Commissioner's Office under data protection registration number ZB521685.

3. PERSONAL INFORMATION WE COLLECT ABOUT YOU AND HOW WE USE IT

The table in the [Annex](#) sets out the categories of personal information we collect about you and how we use that information. The table also lists the legal basis which we rely on to process the personal information.

More generally, we:

- (a) collect personal information that you voluntarily submit to us, such as your contact details and identification information, when you use our Site or our online and in-store payments service or otherwise interact with us by email, at online and physical events or in the course of our business activities;
- (b) may also collect personal information from third parties, such as background checking service providers, social networks, public databases (where permitted by law), corporate websites and our partners where we carry out joint business activities; and
- (c) may automatically collect personal information about how you access and use the Site and information about the device you use to access the Sites and our newsletters (such as the pages you visit).

We use the information we collect in relation to you to correspond with you, perform our agreements (including with you or the organisation you represent), comply with our regulatory responsibilities, carry out marketing activities and day-to-day business activities and operations.

We will indicate to you where the provision of certain personal information is required in order for us to provide you certain services. If you choose not to provide such personal information, we may not be able to provide the services you have requested.

4. OUR PAYMENT SERVICE PROVIDER

We use Stripe for payment, analytics, and other business services. Stripe collects and processes personal data, including identifying information about the devices that connect to its

services. Stripe uses this information to operate and improve the services it provides to us, including for fraud detection and prevention. You can learn more about Stripe and its processing activities via privacy policy at <https://stripe.com/privacy>.

5. INFORMATION WE PROCESS AS PROCESSOR FOR OUR CUSTOMERS

When we provide our online and in-store payments service to our customers, we process personal data on behalf of our customers in our capacity as their processor.

To the extent that we are acting as processor, in accordance with data protection laws, we process such personal data in accordance with our customer's instructions and any agreement in place with our customers. We will only use such personal data for the purposes of providing the services for which our customers have engaged us.

Our customers are responsible for ensuring that the privacy of individuals whose personal data they are processing is respected, including communicating to these individuals in their own privacy policies with whom the individual's personal data is being shared and by whom it is being processed.

As a data processor, we may share personal data where instructed by our customers (the data controller). With our customer's specific or general authorisation, we share personal data with our third party service providers (including Stripe, Inc. and Stripe Payments Europe, Ltd).

Where we are acting as a processor, we will refer any request from an individual for access to their personal data to our customer. We will not respond directly to the request.

We retain personal data which we process on behalf of our customers for as long as needed to provide services to our customers and in accordance with any agreement in place with our customers.

6. ANALYTICS AND RESEARCH

We may use personal information that we collect about you for purposes that include testing our IT systems, research, data analysis, improving our Site and developing our online and in-store payments service and new products and features. Where appropriate, we will anonymise your information for these purposes.

7. RECIPIENTS OF PERSONAL INFORMATION

We may share your personal information with the following (as required in accordance with the uses set out in the [Annex](#)):

- (a) **Service providers and advisors:** we may share your personal information with third party vendors and other service providers that perform services for us or on our behalf, which may include providing email, advertising, fraud prevention, background and anti-money laundering checks, web hosting, or providing analytic services.
- (b) **Business partners:** we may share your personal information (such as contact details) with our business partners, such as trade credit providers, where this is necessary in the normal course of our business.
- (c) **Purchasers and third parties in connection with a business transaction:** your personal information may be disclosed to third parties in connection with a transaction, such as a merger, sale of assets or shares, reorganisation, financing, change of control or acquisition of all or a portion of our business.

- (d) **Law enforcement, regulators and other parties for legal reasons:** we may share your personal information with third parties as required by law or if we reasonably believe that such action is necessary to (i) comply with the law and the reasonable requests of law enforcement; (ii) detect and investigate illegal activities and breaches of agreements; and/or (iii) exercise or protect the rights, property, or personal safety of Brippo, its users or others.
- (e) **Other members of the Brippo group:** we may share your personal information with our affiliates (for example, where they provide services on our behalf) or where such sharing is otherwise necessary in accordance with the uses set out in the [Annex](#).

8. **MARKETING AND ADVERTISING**

From time to time we may contact you with information about our products and services, including sending you marketing messages and asking for your feedback on our products and services.

Most marketing messages we send will be by email. For some marketing messages, we may use personal information we collect about you to help us determine the most relevant marketing information to share with you.

We will only send you marketing messages if we have your consent or, if consent is not required under applicable law, you have not opted out of receiving messages from us. You can withdraw your consent or opt out of receiving further communications at a later date by clicking on the unsubscribe link at the bottom of our marketing emails.

Unsubscribing from marketing emails will not unsubscribe you from system notifications which we need to send as part of the Service we provide. From time to time we may need to contact you by email or via our support team.

9. **DATA SECURITY**

We implement appropriate technical and organisational measures, including encryption, to protect your personal information against accidental or unlawful destruction, loss, change or damage. All personal information we collect will be stored on our secure servers. We will never send you unsolicited emails or contact you by phone requesting your account ID, password or national identification numbers.

10. **DATA RETENTION**

We will store the personal information we collect about you for no longer than necessary for the purposes set out in the [Annex](#) in accordance with our legal obligations and legitimate business interests.

To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, as well as the applicable legal, regulatory, tax, accounting or other requirements.

11. **INTERNATIONAL TRANSFERS OF YOUR PERSONAL INFORMATION**

Your personal information may be transferred outside of the UK and the European Economic Area ("EEA") to where our affiliates and our third-party service providers have operations. In such case, any international transfers of your personal information will be made pursuant to appropriate safeguards, such as standard data protection clauses adopted by the UK Information Commissioner's

Office or the European Commission. If you wish to enquire further about the safeguards used, please contact us using the details set out at the end of this privacy policy.

12. YOUR RIGHTS IN RESPECT OF YOUR PERSONAL INFORMATION

In accordance with applicable privacy law, you have the following rights in respect of your personal information that we hold:

- (a) **Right of access.** You have the right to obtain access to your personal information.
- (b) **Right of portability.** You have the right, in certain circumstances, to receive a copy of the personal information you have provided to us in a structured, commonly used, machine-readable format that supports re-use, or to request the transfer of your personal data to another person.
- (c) **Right to rectification.** You have the right to obtain rectification of any inaccurate or incomplete personal information we hold about you without undue delay.
- (d) **Right to erasure.** You have the right, in some circumstances, to require us to erase your personal information without undue delay if the continued processing of that personal information is not justified.
- (e) **Right to restriction.** You have the right, in some circumstances, to require us to limit the purposes for which we process your personal information if the continued processing of the personal information in this way is not justified, such as where the accuracy of the personal information is contested by you.
- (f) **Right to object.** You have a right to object to any processing based on our legitimate interests in certain circumstances. You can also object to our direct marketing activities for any reason by clicking the “unsubscribe” link set out in any marketing communication you receive. Unsubscribing from marketing communications will not unsubscribe you from system notifications which we need to send as part of the Service we provide. From time to time we may need to contact you by email or via our support team.
- (g) **Right to withdraw consent.** If you have provided consent to any processing of your personal information, you have a right to withdraw that consent.

Please note that the above rights are not absolute and we may be entitled to refuse requests, wholly or partly, where exceptions under the applicable law apply.

If you wish to exercise one of these rights, please contact us using the contact details at the end of this privacy policy.

13. COOKIES AND SIMILAR TECHNOLOGIES

Our Site uses cookies to distinguish you from other users of our Site. Please refer to our Cookies Policy for more information as to the way in which we use cookies on our Site.

14. LINKS TO THIRD PARTY SITES

This Site may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our Site, we encourage you to read the privacy policy of every website you visit.

15. COMPLAINTS

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 (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

16. CHANGES TO THIS POLICY

We may update this privacy policy from time to time and so you should review this page periodically. When we change this privacy policy in a material way, we will update the "last modified" date at the end of this privacy policy. Changes to this privacy policy are effective when they are posted on this page.

17. CONTACTING US

If you have any questions, comments and requests regarding this Privacy Policy, you can contact us:

By post: Brippe Limited, 71-75 Shelton Street, Covent Garden, London, WC2H 9JQ

By email: info@brippe.com

This privacy policy was last modified on 7 March 2023

ANNEX – PERSONAL INFORMATION WE COLLECT

| Category of personal information | How we use it | Legal basis for processing |
|---|---|--|
| <p>Contact details (name, business, email, phone number);</p> <p>employment information (job title, employer);</p> <p>account details (username, and password (if applicable))</p> | <p>To enter into a commercial relationship with you (for example, to provide our services and/or to contact you about them where necessary) and to manage our ongoing commercial relationship with you (for example, dealing with any enquiries you have made and/or ensuring you are using our services in the most effective and proper way).</p> <p>To send you email newsletters, interesting blogs, news, webinars, giveaways and to keep you up-to-date about our products and services which we think will interest you.</p> <p>Provision of customer support and to administer the Site (including troubleshooting and resolving technical issues)</p> <p>To communicate with you regarding changes to our policies, other terms and other administrative information such as reminders, technical notices, updates and security alerts</p> | <p>Such processing is in our and your legitimate interests to ensure the organisation you represent is provided with our services in accordance with our contract with that organisation.</p> <p>Either consent (if required under applicable law) or our legitimate interests, namely marketing and advertising to our contacts and customers to grow our business.</p> <p>Such processing is necessary for our legitimate interests, namely to ensure we are able to resolve any issues you have in accessing the Site or using our services.</p> <p>Such processing is necessary for our legitimate interests, namely to ensure you are aware of any changes to our policies, terms and other such technical updates.</p> |
| <p>Contact details (name, email, phone number);</p> <p>bank account details</p> | <p>To collect payment for our services and maintain a record of payments. Certain payment data may be processed by our payment service provider.</p> | <p>Performance of a contract.</p> |
| <p>Technical information (IP address, browser type,</p> | <ul style="list-style-type: none"> Analytics | <p>Consent.</p> |

| Category of personal information | How we use it | Legal basis for processing |
|--|---|--|
| <p>internet service provider, device identifier, your login information, time zone setting, browser plug-in types and versions, preferred language, activities, operating system and platform, and geographical location);</p> <p>Usage data (clickstream to, through and from the Site, pages you viewed and searched for, page response times, length of visits to certain pages, referral source/exit pages, page interaction information (such as scrolling, clicks and mouse-overs), date and time pages are accessed, and website navigation and search terms used)</p> | <ul style="list-style-type: none"> • Improve the Site to ensure that content is presented in the most effective manner for you • Marketing and Advertising • To ascertain your preferences | |
| All data | To administer and protect our business, website and services (including fraud prevention and detection, troubleshooting, data analysis and system testing) and to keep our website and services secure. | Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business re-organisation or group restructuring exercise). |
| | To enable us to comply with any legal or regulatory requirements and otherwise to comply with any relevant regulator or competent authority. | To comply with our legal obligations. |