

PERSONAL DATA PROCESSING

1. What is personal data

Personal data means any information relating to an identified or identifiable natural person, such as for instance your contact information, your order data or your product data.

2. General principles for personal data processing by Better Business Expert

We adhere to the following principles when processing your personal data:

1. we will only collect personal data for specified, explicit and legitimate purposes;
2. will not collect personal data beyond what is necessary to accomplish those purposes;
3. we will not use personal data for purposes other than that for which the data was collected, except as stated herein, or with prior consent;
4. we will not transfer personal data to third parties, except as stated herein, or with prior consent;
5. we will do our best to ensure that information is up to date by encouraging you to verify your personal data periodically;
6. we will maintain appropriate technical and organizational measures to protect your personal data against accidental or unlawful destruction or accidental loss, alteration, unauthorized disclosure or access and against all other unlawful forms of processing; and
7. except when stated herein, we will not store personal data longer than is necessary to accomplish the purpose for which the data were collected or for which they are further processed, or as is required by law.

3. Personal data we collect and process

When you engage with Better Business Expert via various channels, including our websites, apps, consultants and customer support, we collect and process your personal data. The personal data that we collect and process can be categorized as follows:

- 1) Your personal details, such as your name, e-mail address, physical address (if provided), phone number (if provided), IP address, in some cases geo location and language.
- 2) Your purchase information, such as your personal details as specified above, company name (if provided), your delivery information, such as delivery address, if different from physical address, your order information, such as product name, quantity, product name, date of purchase, your payment information, such as credit card or similar payment information and friend referral (if applicable).

3) Your use information, such as your personal details as specified above, information regarding your BETTER BUSINESS EXPERT product(s), product and app usage type, date and frequency, log-in credentials, encrypted credentials for third party services offered in our app(s), information you choose to attribute in connection with your BETTER BUSINESS EXPERT devices, product use activity log (unless such function has been disabled by you) and social media log-in credentials (not the information contained in your social media profiles), if used as log-in to BETTER BUSINESS EXPERT app(s).

4) Requests for customer support and technical assistance, containing your personal details, as specified above, product serial number, place of purchase and other relevant information, which Better Business Expert may inquire in order to proceed with your request.

5) Information provided when completing surveys, questionnaires and feedback forms, such as your personal details, as specified above, your BETTER BUSINESS EXPERT product warranty ID, place of purchase, your feedback on your use of BETTER BUSINESS EXPERT product(s) and evaluation of the same, your location information.

6) Your behaviour information collected via use of cookies and similar technologies like pixels, tags and other identifiers in order to remember your preferences, to understand how our websites and app(s) are used and to customize our marketing offerings.

4. How we use your personal data

We only collect and process personal data, if at least one of the below mentioned purposes applies:

1) We provide you with customised information on news, events, competitions and similar marketing content related to Better Business Expert, its products and products made in collaboration with third parties. Our processing in this regard will be based on your consent thereto.

2) We handle your purchase orders, complete purchase transactions, ensure delivery of purchased product(s). Our processing is necessary for the performance of a contract, to which you are a party.

3) We provide you with relevant product software updates and make your future purchases easier by remembering your shipping details. Our processing is necessary for the purposes of the legitimate interests pursued by Better Business Expert and such processing is not considered to be harmful towards you.

4) We provide you with customer service, handle your requests or complaints and provide you with product warranty support. Our processing is necessary for the performance of a contract, to which you are a party.

5) We ensure better customer experience by providing you with personal benefits, such as discounts or customised offers based on previous purchases and possible friend referrals. Our processing in this regard will be based on your consent thereto.

6) We provide you with customised app user experience, by for instance making setup of your present and future BETTER BUSINESS EXPERT product(s) easier across multiple

devices, by allowing you to manage your BETTER BUSINESS EXPERT products and to choose preferred profile, by providing you with customised content on our app(s) and with easier access to product user guidance and by supporting multiple BETTER BUSINESS EXPERT app users within the same household to manage use of BETTER BUSINESS EXPERT product(s). Our processing in this regard will be based on your consent thereto.

7) We conduct analytics and statistics on use type, date and frequency of BETTER BUSINESS EXPERT products to learn how our products are used, to improve the quality of our products and to develop new ones. Our processing is necessary for the purposes of the legitimate interests pursued by Better Business Expert and such processing is not considered to be harmful towards you.

8) We collect you feedback regarding your use of BETTER BUSINESS EXPERT products and services by inviting you to complete surveys, questionnaires or feedback forms. Our processing in this regard will be based on your consent thereto.

Accordingly, some of your personal data is collected and processed in order for us to fulfill our contractual obligations to you, for instance, when you purchase our products, contact our customer support. Should you choose not to provide us with the requested and necessary personal data in this regard, we might not be able to fully satisfy your request.

5. Where we store and process your personal data

As a general principle, your personal data is stored and processed within the European Economic Area (EEA).

In case of transfer of your personal data to any third countries, as defined in General Data Protection Regulation (GDPR), valid law and regulations concerning such transfers are observed and relevant legal and security safeguards are ensured before such transfer.

6. Our disclosure of your personal data to third parties

As a general principle, we collect and process data in order to facilitate or improve Better Business Expert's products, services or offers. We do not sell your personal data or share the said data with third parties.

We may disclose your personal data to third parties to the extent required by law, court order or a decision rendered by a competent public authority and for the purpose of law enforcement. In addition, we may share your personal data with the following third parties:

- 1) Our group companies and authorised BETTER BUSINESS EXPERT consultants in order to deliver products and services to you, to ensure a consistent level of service across our products and services, to enhance our products, services and your customer experience.
- 2) Third party vendors carrying out services on our behalf, including billing, sales, marketing, IT support, advertising, analytics, research, customer service, product service support, shipping and purchase order fulfillment, data storage, validation, security, fraud prevention, payment processing, and legal services. Such third-party vendors have access to perform these services but are prohibited from using your

personal data for other purposes.

3) Third parties in order to establish, exercise or defend legal rights of BETTER BUSINESS EXPERT Group.

4) Third parties in the event of any merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of BETTER BUSINESS EXPERT's assets or stock (including without limitation in connection with any bankruptcy or similar proceedings).

5) Other third parties subject to your consent.

When we disclose your personal data to a third party, we take all reasonable steps to ensure that those third parties are bound by confidentiality and privacy obligations with respect to the protection of your personal data. The disclosure is conducted in compliance with legal requirements, including entering into data processing agreements with the relevant third parties, to ensure that personal data is only processed in accordance with our instructions, applicable law and regulations and for the purpose specified by us and to ensure adequate security measures.

7. Retention of your personal data

We keep your information for no longer than necessary for the purposes for which it is collected. The length of time for which we retain information depends on the purposes for which we collected and use it.

Personal data related to your purchase and product warranty information is kept and processed for a period of five (5) years from the date of purchase, unless you have obtained extended warranty period or such data is legitimately processed for other purposes, such as providing you with personal benefits or customised direct marketing upon your consent or for pursuing our legal claims, where maintaining such information is considered necessary.

Personal data related to our provision of direct marketing to you is kept and processed for a period of three (3) years from the date you last have been active in opening our marketing communication or otherwise showing interest in such communication.

Personal data related to your use of our apps and product software update(s) is kept and processed for a period of three (3) years from the date you last have been active in using any of Better Business Expert apps.

Personal data related to your use of your BETTER BUSINESS EXPERT products is kept and processed for a period of five (5) years from the first use day of the given product, unless such data is legitimately processed for other purposes, such as providing you with personal benefits or customised direct marketing upon your consent or for pursuing our legal claims, where maintaining such information is considered necessary.

Personal data related to our provision of personal benefits to you is kept and processed for a period of five (5) years from the date of your last purchase of BETTER BUSINESS EXPERT product. Personal data related to your feedback on our products and services is kept and

processed for a period of two (2) years from the completion date of the given survey, questionnaire of feedback form.

Relevant personal information will be deleted after expiry of the above-mentioned periods, unless such data legitimately can be kept and processed for other processing purposes, which we have legal basis for.

8. Cookies

We use cookies and similar technologies like pixels, tags and other identifiers in order to remember your preferences, to understand how our websites and apps are used and to customize our marketing offerings.

A cookie is a small text file that is placed on your computer or mobile device when you visit a site, that enables us to: (1) recognise your computer; (2) store your preferences and settings; (3) understand the web pages of Better Business Expert you have visited; (4), enhance your user experience by delivering and measuring the effectiveness of content and advertising tailored to your interests; (5) perform searches and analytics; and (6) assist with security and administrative functions. Some cookies are placed in your browser cache while those associated with Flash technologies are stored with your Adobe Flash Player files.

Pixels are tiny electronic tags with a unique identifier embedded in websites, online ads and/or email that are designed to: (1) collect usage information like ad impressions or clicks and e-mail open rates; (2) measure popularity of the advertising; and (3) access user cookies.

As we adopt additional technologies, we may also gather information through other methods.

Please note that you can change your settings to notify you when a cookie is being set or updated, or to block cookies altogether. Please consult the "Help" section of your browser for more information. You can also manage the use of Flash technologies, including flash cookies and local storage objects with the Flash management tools available at Adobe's website. Please note that by blocking, disabling, or managing any or all cookies, you may not have access to certain features or offerings on our websites or apps. For example, to complete a purchase on our websites, you will need to accept cookies sent by our sites. For more information on the cookies we use and the purposes for which we use them, please refer to our [Cookies Policy](#).

9. Responsible for processing

Better Business Expert, Nigel Moore, 18 Oriel Close, Walkington, East Yorkshire HU17 8YD is data controller and is responsible for the processing of your personal data.

YOUR RIGHTS

10. Access to your personal data and data portability

You have right to access and receive the personal data concerning you, which you have provided to Better Business Expert, in a structured, commonly used and machine-readable format and have the right to transmit those data to any third party, you should choose to. Your personal data processed by Better Business Expert can be accessed in your accounts

section of the website.

11. Updating and/or deleting your personal data

We encourage you to update your personal data provided to Better Business Expert any time there are changes in your personal data. This can be done by updating the accounts section of the website or by sending us any changes.

In order to ensure that your personal data processed by us is up-to-date we request you to check and, if relevant, update your personal data at least once a year.

Your personal data can be deleted from Better Business Expert servers by writing to us or e-mailing us with the request, unless Better Business Expert is entitled or obliged by applicable law and regulations to keep and process such information regardless withdrawal of your consent.

Following deletion your personal data will be deleted from servers of Better Business Expert without undue delay, while it might take a period of two (2) months to ensure complete deletion of any information that might be stored in our back-up.

You may also contact Better Business Expert to review, update or delete personal data stored about you. For relevant contact details please see section 19 below. Please note that prior to accessing and making changes to your account, we will need to verify your identity properly.

12. Right to withdraw your consent

Some of Better Business Expert's processing activities may be based on your consent. In such case, you will have the right to withdraw your consent at any time. Withdrawal of your consent will not affect the lawfulness of processing conducted prior to the withdrawal.

If you withdraw your consent, Better Business Expert and third parties involved in personal data processing will cease to process your personal data, unless and to the extent the continued processing or storage is permitted or required according to the applicable personal data legislation or other applicable laws and regulations. Please note that as a consequence of your withdrawal of your consent, Better Business Expert may not be able to meet your requests or provide you with our services.

13. Right to restriction of processing and right to object

You have the right to restriction of processing of your personal data, if the personal data is not correct, if the processing is unlawful, but you oppose erasure of your personal data, if Better Business Expert no longer needs your personal data for the purposes of processing, but storing such data is requested by you for the establishment, exercise or defence of legal claims, or if you have objected to processing and verification, whether Better Business Expert still has legitimate interest in the given personal data is pending. Please see section 19 for relevant contact details.

At any time you have the right to object to processing of your personal data collected and processed for purposes of the legitimate interests pursued by Better Business Expert, for instance, when we provide you with relevant product software updates, make your future

purchases easier by remembering your shipping details, or when we conduct analytics and statistics on your use type, date and frequency of BETTER BUSINESS EXPERT products. Please see section 19 for relevant contact details.

Furthermore, you have the right to object to processing of your personal data for direct marketing purposes. You can do so by unsubscribing from our marketing information by clicking on the unsubscribe link in the bottom of marketing communication from Better Business Expert or by accessing your profile in the accounts section of the website.

14. Right to complain

If you want to complain about a privacy breach, please contact Better Business Expert by sending your complain to Better Business Expert, Nigel Moore, 18 Oriel Close, Walkington, East Yorkshire HU17 8YD Att. Legal or by sending e-mail to nigel@njm-solutions.com

We will acknowledge receipt of your complaint within five (5) business days. We will do our best to resolve it as quickly as possible and within one (1) month from the date of complaint. In case response would require longer term than one (1) month, we will let you know and inform you of the relevant reason(s).

If you are not satisfied with outcome of your complaint or with handling of your complaint at Better Business Expert, you may refer your complaint to the ICO, Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AFk or by calling Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number

MISCELLANEOUS

15. Third-party websites, plug-ins and services

Websites, apps and products of Better Business Expert may contain links to third party websites, plug-ins, for instance social media login plug-in, or services, for instance voice control functionality provided by Amazon or Google. As regards your use of voice enabled BETTER BUSINESS EXPERT products, please note that Better Business Expert does not collect or process any sound recordings on its own behalf, but only makes available third party services.

If you choose to use these websites, plug-ins or services, you may disclose your information to those third-parties. Better Business Expert is not responsible for the content or practices of those websites, plug-ins or services. The collection, use, and disclosure of your personal data will be subject to the privacy policies of these third parties and not this Privacy Policy. We urge you to read the privacy and security policies of the relevant third-parties.

16. Data security

Better Business Expert is committed to protecting the security of your personal data. We use necessary organizational, technical, and administrative measures to protect your personal data under control of Better Business Expert, such as control of access, transmission, input and availability and the separation of data.

Access to a number of online services at Better Business Expert are protected by access restrictions based on user name and password. It is important that you always choose a password which is hard to guess for others, and protect your password against disclosure.

Your personal details and your credit card details, if you have provided such to Better Business Expert remain encrypted in BETTER BUSINESS EXPERT's secure web servers. Credit card information is directed to one or more approved and certified service provider(s), and will not be stored for longer than it takes to process the data. All external transmissions of personal data facilitated by Better Business Expert are protected by encryption.

All data storage and processing at computer facilities of Better Business Expert as well as at business partner facilities are subject to written contracts.

If you have reason to believe that your interaction with Better Business Expert is no longer secure (for example, if you feel that the security of any account you might have with Better Business Expert has been compromised), please notify us of the problem immediately by contacting us. Please see section 19 for relevant contact details.

17. Use by children

Better Business Expert does not target and is not intended to attract children. Accordingly, our online services, including personal accounts on websites and apps provided by Better Business Expert that collect any personal data are not directed at and should not be accessed by individuals under the age of sixteen (16 years), and we request that such individuals do not provide any personal data to Better Business Expert. Minors must obtain express consent from parents or legal guardians prior to accessing or providing any personal data. If notified by a parent or guardian or discovered by other means, that a child under age of sixteen has provided his or her personal data to Better Business Expert, we will cancel the child's account, if any, and delete the child's personal data in our possession.

18. Changes to our Privacy Policy

Better Business Expert may modify or update this Privacy Policy when necessary to reflect changes in our products and services, changes in applicable legislation, regulations or practice and to address customer feedback. Accordingly, please review it periodically. Date of the latest update is always provided on the top of the document.

If there are material changes to this Privacy Policy, you will notify you either by posting a notice or by sending you a notification.

19. Contact details

If you have questions about this Privacy Policy or BETTER BUSINESS EXPERT's processing of your personal data, please contact us at:

Broadgates Brokerage Ltd T/A Better Business Expert
18 Oriel Close,
Walkington
East Yorkshire

HU17 8YD
UK
Att.: Legal

or by sending e-mail to nigel@betterbusinessexpert.co.uk