

ZUMA WEBSITE PRIVACY POLICY

Version 1.0 – May 2021

Zuma Array Limited (a company registered in England with registered number 11631668) (“us”, “our”, “we”, “Zuma”) is the controller of your personal data collected through our website. Zuma is committed to protecting and respecting your privacy.

This privacy policy (the “Policy”) sets out the types of personal data we collect and use when you access and visit www.zuma.ai (the “Website”) and how we may use that data.

1. Introduction

This Policy explains who we are, why and how we process personal data collected through your use of our Website and, if you are the subject of any of the personal data concerned, what rights you have and how to get in touch with us if you need to.

When you supply any personal data to us we have legal obligations towards you in the way we use that data. For ease of reading, we have divided this Policy into several sections:

1. [Introduction](#)
2. [What information can we collect?](#)
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It is important that you read this Policy together with any other privacy notice or fair processing notices that we may provide on the Website at or around the time that we collect or process personal data about you (for example, fair processing notices that we may display to you at the time that you sign up to receive e-mail updates from us) so that you are fully aware of how and why we may use data.

This Policy supplements other notices on the Website, including our [Terms & Conditions](#) and should be read alongside such terms. This Policy is not intended to override or replace these terms.

By visiting or otherwise using the Website, you agree to our terms (including as amended from time to time) and this Policy. If, for any reason, you do not agree to the terms of this Policy, please stop using the Website.

We reserve the right to revise, update or amend this Policy at any time to reflect changes to our business or changes in the law. Where these changes are significant we will endeavour to let users of the Website know, most likely by way of showing you a notification when you next log in to the Website. However, it is your responsibility to check this Policy before each

use of the Website and to make yourself aware of any changes. For ease of reference the top of this Policy indicates the date on which it was last updated.

Please note that the Website, and our products more generally, are not directed at children under the age of 13 (each a "**Child**" or collectively "**Children**") and we do not knowingly collect personal data about Children. If you believe we have collected personal data about your Child, you may contact us at help@zuma.ai and request that we cease processing data about your Child.

2. What information can we collect?

What is personal data?

Where this Policy refers to 'personal data' it is referring to data about you from which you could be identified – such as your name, your date of birth, your contact details and even your IP address.

By law all organisations who process your personal data in the UK are obliged to process your personal data in certain ways and to ensure that you are given an appropriate amount of information about how they use it. You also have various rights to seek information from those organisations about how they are using your data, and to prevent them from processing it unlawfully. For more information about these rights, please see the 'Your Rights' section of this Policy.

What types of data we collect from you when you use the Website

The personal data we collect from you depends on precisely what details you volunteer to us as you interact with the Website but may include:

- **Identity Data** which may include your name and address.
- **Contact Data** which may include your e-mail address, phone number, billing address and delivery address.
- **Profile Data** which, if you use the Website to create an individual user account, will include your username, any password that you may set for it (if you do set up an individual user account, it will be associated with your given e-mail address), your interests, preferences, feedback and survey responses.
- **Device Data** which may include data about the device(s) on which you visit the Website, such as your mobile operating system, any unique ID assigned to that device, and technical information about the type of device you are using.
- **Financial Data** which, where you provide them (for example if you set up any kind of subscription for services from us or if you purchase Zuma products directly from us), may include your bank account and/or payment card details, to the extent that they are required to enable the relevant transaction.
- **Transaction Data** which includes details about payments that you have made to us and details about the products or services that those transactions relate to.

- **Technical Data** which includes, Device Data, your IP address, your login data, operating system and browser type and version (i.e. data that enables us to provide electronic services to you across the internet and/or WiFi networks).
- **Location Data** which includes data about where you access the Website from.
- **Usage Data** which includes information about how you use the Website, such as which third party services you link to and how you use the Website to interface with Zuma products.
- **Marketing and Communications Data** which includes your preferences in receiving marketing from us (i.e. whether you have subscribed to receive any marketing communications from us and any relevant third parties) including information about the kind of adverts that we believe you are most likely to be interested in.

3. How is your personal data collected?

Direct interactions with us

When you use the Website you are likely to upload or provide a certain amount of personal data to us in response to various questions and forms which we present to you as part of the process of setting up your account. This will include Identity, Contact and potentially Financial Data as you will provide us with details about your name and location as part of creating your account and then populating your user profile page.

Any data about yourself that you provide or volunteer to us and/or upload to the Website (for example: by completing a registration form; applying for a product or service; subscribing to a publication or newsletter; requesting marketing to be sent to you; participating in social media functions; taking part in an online survey; filling in a form or questionnaire that we present to you; posting a comment or otherwise messaging on the Website; entering competitions; or similar activities); when you report a problem with the Website; or when you contact us by e-mail, telephone or by post, we may collect, store and use the personal data that you disclose to us

Automated technologies or interactions

We will also collect personal data about you and various information about the technology you use through the use of technologies such as cookies when you visit and interact with the Website. The following are examples of information we may collect:

- information about your device, browser or operating system;
- your IP address;
- information about links that you click and pages or content you view on the Website;
- length of visits to certain pages or content;
- subjects you viewed or searched for;
- page response times;
- records of download errors and/or broken links;
- page interaction information (such as details of your scrolling, clicks, and mouse-overs);
- methods used to browse away from a page; and

- the full Uniform Resource Locators (URL) clickstream to, through and from the Website (including date, time, Technical Data and Usage Data).

We use the data described above for several different reasons. Firstly, we use it to ensure that the Website works properly and that you are able to receive the full benefit of it. Second, we use the data to monitor online traffic and participation across the Website which helps us to improve the Website's functionality, optimise the ways that it operates, and to focus our time and creativity on the features or products which users prefer. We undertake these activities because we have a legitimate interest in doing so.

Third parties or publicly available sources

We also partner with third parties who may collect anonymous usage or statistical data through your use of the Website (including, for example, business partners, sub-contractors in technical and delivery of services, advertising networks, analytics providers, search information providers, credit reference agencies). We may receive information about you from these partners through the use of cookie technologies to personalise advertisements for goods and services. To opt out of receiving advertisements tailored to your interests by our partners, visit the European Interactive Digital Advertising Alliance at <http://youronlinechoices.eu/>

Updating your information

If you want to update the information you have previously given to us, you can contact us at help@zuma.ai.

4. How and why do we use and share your personal data?

Lawful basis for processing your information

We will only use your personal data when the law allows us to. Most commonly we will use your personal data in the following circumstances:

- Where you have asked us to do so, or have otherwise consented to us doing so;
- Where we need to do so in order to perform a contract we have entered into with you;
- Where it is necessary for our legitimate interests (or those of a third party) and your fundamental rights do not override those interests; and
- Where we need to comply with a legal or regulatory obligation.

Here are some examples about how we may use the information we collect about you and the lawful basis we rely on to do so.

Activity	Examples of the types of personal data we may collect	Lawful basis for processing
To provide you with our services and register you as a new account holder.	Identify, contact, financial, transactional, technical, profile and marketing communications information.	Performance of a contract with you.
To process and deliver your orders including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	Identify, contact, financial, transactional, technical, profile and marketing communications information.	Performance of a contract with you. Necessary for our legitimate interests (to recover debts due to us and creators).
To test new products, track products and services that are popular, develop new ways to work with our customers and manage how we interact with third parties.	Identify, contact, financial, transactional, profile and marketing communications information.	Performance of a contract with you. Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business).
To obey applicable laws and regulations, manage risk for us and our customers, respond to complaints and seek to prevent crime.	Identify, contact, financial, transactional, profile and usage information.	Necessary for our legitimate interests (for running our business, network security and to prevent fraud). Necessary to comply with our legal / regulatory obligations.
To manage our relationship with you including notifying you of any changes to the Website or services provided on the Website.	Identity, contact, profile information, transactional and marketing communications information.	To take the necessary steps to arrange a contract with you. Performance of a contract with you. Necessary to comply with our legal / regulatory obligations. Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services).

<p>To enable you to partake in a prize draw, competition or complete a survey.</p>	<p>Identity, contact, profile, usage and marketing communications information.</p>	<p>Performance of a contract with you.</p> <p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business).</p>
<p>To administer and protect our business and the Website (including troubleshooting, data analysis, credit and fraud checks and system testing.)</p>	<p>Identity, contact and technical information.</p>	<p>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 reorganisation or group restructuring exercise).</p> <p>Necessary to comply with our legal / regulatory obligations.</p>
<p>To deliver relevant content, newsletters and advertisements (including making suggestions and recommendations to you about goods or services that may be of interest) to you via the Website or to otherwise personalise your experience on the Website.</p>	<p>Identity, contact, profile, usage, marketing and communications, transactional and technical information.</p>	<p>Necessary for our legitimate interests to promote products, surveys and services we offer that you may be interested in.</p> <p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy).</p>
<p>To use data analytics to improve and optimise the effectiveness and functioning of the Website, our services, marketing, customer relationships and experiences.</p>	<p>Marketing communications information, technical and usage information.</p>	<p>Necessary for our legitimate interests (in optimising the content of the Website and ensuring that you are served with relevant commercial communications as you use them).</p>
<p>To respond to your enquiries where you have contacted us via e-mail or telephone or participated in any surveys or reviews.</p>	<p>All types of the data that we collect.</p>	<p>Necessary for our legitimate interests in responding and contacting you regarding the enquiries you have made in relation to the services we</p>

		offer and reviewing your responses to our surveys.
To develop new services for our users, and to innovate and improve the services which they use most frequently.	All types of data that we collect.	Necessary for our legitimate interests (for running, developing and growing our business).

Marketing and Advertising

We may use your personal data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and offers may be relevant for you (we call this marketing).

You will only receive marketing communications from us (such as e-mails or text messages) if you have requested information from us or purchased goods or services from us or via the Website and you have not opted out of receiving that marketing at the time of purchase.

We will get your express opt-in consent before we share your personal data with any third party for their marketing purposes.

Opting Out of Marketing

To unsubscribe from marketing messages at any time, please click on the unsubscribe link at the bottom of any marketing messages. You may also contact us directly if you do not wish to receive any marketing materials from us.

We may retain your e-mail address, or other contact details, on file should you ever 'opt-out' of receiving marketing messages from us. We will retain your contact details in order to ensure that we continue to honour and respect that opt-out request.

Sharing your personal data

Depending on how and why you provide us with your personal data we may share it in the following ways:

- with any member of our company group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.
- with selected official bodies to prevent and detect fraud or credit risks such as: central and local government bodies, HM Revenue & Customs, regulators and other tax authorities, law enforcement agencies, and fraud protection agencies;
- with selected third parties who we sub-contract to provide various products, services and/or aspects of the Website's functionality (such as where we use third parties to provide plugins or functionality; third parties host or store data for us; third parties

provide cloud computing services or we use other IT systems supplied by third parties) – see “Service Providers” below;

- with analytics and search engine providers that assist us in the improvement and optimisation of this Website as described above; and
- with selected third parties who we contract with to provide professional services such as our insurers, accountants, auditors and lawyers.

We will not share your personal data with third parties in order for that third party to provide direct marketing communications to you, unless it relates to a specific activity which we are undertaking with a third party (e.g. a competition where a third party is providing the prize or the booking of a survey and / or install) and you have provided your consent for that use. Such activity may have its own terms and conditions relating to the way in which your personal data may be used, which you will be notified of at the relevant time.

We may also disclose your personal data to third parties in the following events:

- if we were to sell or buy any business or assets, in which case we might disclose your personal data to the prospective seller or buyer of such business or assets as part of that sale;
- if Zuma or substantially all of its assets, are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets;
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or if we are compelled to provide your details to a lawful authority in order to aid in the investigation of crime or disorder; and/or
- in order to enforce or apply the Website’s terms of use or terms and conditions; or to protect the rights, property, or safety of our company, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Service Providers

Our service providers provide us with a variety of administrative, statistical, and technical services. We will only provide service providers with the minimum amount of personal data they need to fulfil the services we request, and we stipulate that they protect this data and do not use it for any other purpose. We take these relationships seriously and oblige all of our data processors to sign contracts with us that clearly set out their commitment to respecting individual rights, and their commitments to assisting us to help you exercise your rights as a data subject. The following is a list of our major service providers:

- Digital Alchemy
- Zendesk
- MailChimp
- Google Analytics

Links to third party sites

Where we provide links to third party websites, plug-ins and applications that are not affiliated with the Website such sites are out of our control and are not covered by this Policy. If you access third party sites using the links provided, the operators of these sites may collect personal data from you that could be used by them, in accordance with their own privacy policies. Please check these policies before you submit any personal data to those websites.

5. For how long do we keep your personal data?

We will hold your personal data on our systems only for as long as required to provide you with the services you have requested, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

Accordingly, you should expect us to keep your personal data for so long as you have a registered user account with us / on the Website (whether that account is actively used or not) and / or for as long as you are a subscriber to our newsletter (or other similar mailings). If you delete your account then we may need to keep some of the personal data associated with that account, or transactions for services made using it, for up to six years (for the reasons described above).

In some circumstances you can ask us to delete some or all of your data earlier: see 'Your Rights' below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

6. Security

Zuma takes the protection of your information very seriously. We have put in place appropriate security measure to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed, including use of secure servers, encryption and passwords. If you have ever chosen a password which enables you to access certain parts of this Website, you are responsible for keeping this password confidential. We ask you not to share the password with anyone.

In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

7. International Data Transfers

If you are based in Europe please note that we use service providers that may be based outside of the European Economic Area (the “**EEA**”). These service providers may work for us or for one of our suppliers and may be engaged in, among other things, the fulfilment of your request for information from the Website, the processing of your payment details and the provision of services or support services.

We endeavour to minimise the number of international data transfers which take place without your prior knowledge and authorisation (such as where the transfer is one that you actively make happen). Where we do use providers based outside of Europe, we usually do so in order to ensure that the Website can work seamlessly where users in one jurisdiction wish to interact with others.

Where we transfer your data to a service provider that is outside of the EEA we seek to ensure that appropriate safeguards are in place to make sure that your personal data is held securely and that your rights as a data subject are upheld. Transfers of personal data are either made:

- to a country recognised by the European Commission as providing an adequate level of protection; or
- to a country which does not offer adequate protection but whose transfer has been governed by the standard contractual clauses of the European Commission or by implementing other appropriate cross-border transfer solutions to provide adequate protection.

By submitting your personal data, you agree to this transfer, storing or processing. If you would like more information about how the mechanism via which your personal data is transferred, please contact help@zuma.ai.

8. Your Rights

If you are resident in the UK or the EEA then the following information about your rights is relevant to you. This part of the Policy is a mandatory statement which summarises certain law applicable in your jurisdiction. It is not a replacement for, nor an extension of, your legal rights so should be read only as a summary of that legislation.

This section is not applicable to you if you do not reside in one of the regions described above.

If you are a resident of one of the regions described above then you have the following rights in relation to your personal data held by Zuma:

Right of Access

You may, at any time, request access to the personal data that we hold which relates to you (you may have heard of this right being described as a "**subject access request**").

Please note that this right entitles you to receive a copy of the personal data that we hold about you in order to enable you to check that it is correct and to ensure that we are processing that personal data lawfully. It is not a right that allows you to request personal data about other people, or a right to request specific documents from us that do not relate to your personal data.

You can exercise this right at any time by writing to us and telling us that you are making a subject access request. You do not have to fill in a specific form to make this request.

Your Right to Rectification and Erasure

You may, at any time, request that we correct personal data that we hold about you which you believe is incorrect or inaccurate. You may also ask us to erase personal data if you do not believe that we need to continue retaining it (you may have heard of this right described as the “**right to be forgotten**”).

Please note that we may ask you to verify any new data that you provide to us and may take our own steps to check that the new data you have supplied us with is right. Further, we are not always obliged to erase personal data when asked to do so if, for example, we have an ongoing legal obligation or need to continue processing that personal data.

You can exercise this right at any time by writing to us and telling us that you are making a request to have your personal data rectified or erased and on what basis you are making that request. If you want us to replace inaccurate data with new data, you should tell us what that new data is. You do not have to fill in a specific form to make this kind of request.

Your Right to Restrict Processing

Where we process your personal data on the basis of a legitimate interest (see the sections of this Policy which explain how and why we use your information) you are entitled to ask us to stop processing it in that way if you feel that our continuing to do so impacts on your fundamental rights and freedoms or if you feel that those legitimate interests are not valid.

You may also ask us to stop processing your personal data (a) if you dispute the accuracy of that personal data and want us verify that data's accuracy; (b) where it has been established that our use of the data is unlawful but you do not want us to erase it; (c) where we no longer need to process your personal data (and would otherwise dispose of it) but you wish for us to continue storing it in order to enable you to establish, exercise or defend legal claims.

Please note that if for any reason we believe that we have a good legal reason to continue processing personal data that you ask us to stop processing, we will tell you what that reason is, either at the time we first respond to your request or after we have had the opportunity to consider and investigate it.

You can exercise this right at any time by writing to us and telling us that you are making a request to have us stop processing the relevant aspect of your personal data and describing which of the above conditions you believe is relevant to that request. You do not have to fill in a specific form to make this kind of request.

Your Right to Portability

Where you wish to transfer personal data that we hold about you, which is processed by automated means, to a third party you may write to us and ask us to provide it to you in a commonly used machine-readable format.

Because of the kind of work that we do and the systems that we use, we do not envisage this right being particularly relevant to the majority of individuals with whom we interact. However, if you wish to transfer your data to a third party we are happy to consider such requests.

Your Right to object to processing

You may object to processing of your personal data where we rely on legitimate interest for processing that personal data. We will comply with your request unless we have a compelling overriding legitimate interest for processing or we need to continue processing your personal data to establish, exercise or defend a legal claim.

Your Right to stop receiving communications

Where we send you e-mail marketing communications (or other regulated electronic messages) you have the right to opt-out at any time. You can do this by using the 'unsubscribe' link that appears in the footer of each communication (or the equivalent mechanism in those communications).

Alternatively, if for any reason you cannot use those links, or if you would prefer to contact us directly – you can unsubscribe by writing to us at help@zuma.ai and telling us which communications you would like us to stop sending you. Please note that where you request a change in this way it is likely to take longer for your request to take effect.

Your Right to object to automated decision making and profiling

You have the right to be informed about the existence of any automated decision making and profiling of your personal data, and where appropriate, be provided with meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing that affects you.

[If you want more information about any automated decision making and profiling or to object to the same you can exercise this right at any time by writing to us and telling us that you are making such a request. You do not have to fill in a specific form to make this kind of request.]

Exercising your rights

When you write to us making a request to exercise your rights we are entitled to ask you to prove that you are who you say you are. We may ask you to provide copies of relevant ID documents to help us to verify your identity.

It will help us to process your request if you clearly state which right you wish to exercise and, where relevant, why it is that you are exercising it. The clearer and more specific you can be, the faster and more efficiently we can deal with your request. If you do not provide us with sufficient information then we may delay actioning your request until you have provided us with additional information (and where this is the case we will tell you).

Statutory Regulator

If you are unhappy with the way that we have processed your data then you have the right to lodge a complaint with your local data and privacy regulator. If you wish to do so then you can write to them using their published contact details.

If you are located in the UK then your local regulator is the Information Commissioner's Office. If you are resident in the European Union then details of your local regulator are published by the European Data Protection Board.

9. Contact Details

If you have any queries regarding this Policy, if you wish to exercise any of your rights set out above or if you think that the Policy has not been followed, please contact us by e-mailing at help@zuma.ai.

You may also lodge a complaint to the supervisory authority about the way we process your personal data. We would however appreciate the chance to address your concerns before you approach the supervisory authority so please contact us in the first instance.