### **Privacy Policy**

We ask that you read this privacy policy carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and supervisory authorities in the event you have a complaint.

This privacy policy is divided into the following sections:

- Who we are
- Our website
- Our collection and use of your personal information
- Transfer of your information out of the UK and EEA
- Cookies and similar technologies
- Marketing
- Your rights
- Keeping your personal information secure
- How to complain
- Changes to this website privacy policy
- How to contact us
- Do you need extra help?

#### Who we are

We are Pocket PA a trading name of Zomsco Ltd and for more information see <a href="www.Pocketpa.com">www.Pocketpa.com</a> We collect, use and are responsible for certain personal information about you due to the General Data

Protection Regulations which apply across the European Union and the United Kingdom.

We are responsible as 'controller' of that personal information for the purposes of those laws.

### Our website

This privacy policy relates to your use of our website, www.PocketPA.com

Throughout our website we may link to other websites owned and operated by certain trusted third parties to make additional products and services available to you. These other third-party websites may also gather information about you in accordance with their own separate privacy policies. For privacy information relating to these other third-party websites, please consult their privacy policies as appropriate.

Our collection and use of your personal information

We collect personal information about you when you access our website, Application (App), purchase products or services via our website.

We collect this personal information from you either directly, such as when you register with us, contact us or purchase products or services via our website or indirectly, such as your browsing activity while on our website (see 'Cookies' below).

The personal information we collect about you depends on the particular activities carried out through our website. This information includes:

- your name, address and contact details
- date of birth
- bank account and payment details, when you add a credit card or payment method to your account using the web application, a third party that handles payments for us will receive your card information. To keep your financial data secure, we do not store full credit card information on our servers.

- details of any feedback you give us by phone, email, post or via social media
- information about the services we provide to you
- your account details, such as username, login details
- We use this personal information to:

This website is not intended for use by children and we do not knowingly collect or use personal information relating to children.

### Our legal basis for processing your personal information

When we use your personal information, we are required to have a legal basis for doing so. There are various different legal bases on which we may rely, depending on what personal information we process and why.

### The legal bases we may rely on include:

- consent: where you have given us clear consent for us to process your personal information for a specific purpose
- contract: where our use of your personal information is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into a contract
- legal obligation: where our use of your personal information is necessary for us to comply with the law (not including contractual obligations)
- legitimate interests: where our use of your personal information is necessary for our legitimate interests or the legitimate interests of a

third party (unless there is a good reason to protect your personal information which overrides our legitimate interests)

- create and manage your account with us
- verify your identity
- provide goods and services to you
- customise our website and its content to your particular preferences
- notify you of any changes to our website or to our services that may affect you
- provide, improve, expand, and promote the services
- analyse how the company community uses the services.
- communicate with you, either directly or through one of our partners, including for marketing and promotional purposes.
- facilitate transactions and payments.
- provide you with customer support.
- personalise the company experience for you and your friends and contacts;
- send you the text messages and push notifications;
- respond to trust and safety issues that may arise, and requests from government authorities.

We routinely share categories of personal data shared (e.g. your name and delivery address details) with our third party like Kartra (e.g. our third party suppliers).

This data sharing enables us to provide an effective and efficient service to you.

Some of those third-party recipients may be based outside the United Kingdom and European Economic Area — for further information

including on how we safeguard your personal data when this occurs, see 'Transfer of your information out of the UK and EEA'.

We will share personal information with law enforcement or other authorities if required by applicable law.

We will not share your personal information with any other third party.

Whether information has to be provided by you, and if so why

We require you to provide your name, address, email address to enable us to deliver our service to you. We will inform you at the point of collecting information from you, whether you are required to provide the information to us.[1]

Transfer of your information out of the UK and EEA

 We may transfer your personal information to countries which are located outside the United Kingdom (UK) and European Economic Area (EEA)

If you would like further information please contact us.

# Cookies and other tracking technologies

A cookie is a small text file which is placed onto your device (e.g. computer, smartphone or other electronic device) when you use our website. We use cookies on our website. These help us recognise you

and your device and store some information about your preferences or past actions.

For further information on cookies our use of, when we will request your consent before placing them and how to disable them, please see our Cookie Policy.

# Marketing

We would like to send you information about products and services, which may be of interest to you. Where we have your consent or it is in

our legitimate interests to do so, we may do this by post, email, telephone, text message (SMS) or automated call.

We would also like to share your information with selected third parties so that they may send you information about their products and services, depending on what you agree with us.

We will only ask whether you would like us to send you marketing messages when you tick the relevant boxes or download any of our marketing materials or free resources.

If you have previously agreed to being contacted in this way, you can unsubscribe at any time by:

- —contacting us at help@pocketpa.com
- -using the 'unsubscribe' link in emails or 'STOP' number in texts

It may take up to 7 days for this to take place.

For more information on your rights in relation to marketing, see 'Your rights' below.

## Your rights

Under the General Data Protection Regulations, you have a number of important rights free of charge. In summary, those include rights to:

- fair processing of information and transparency over how we use your use personal information
- access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address
- require us to correct any mistakes in your information which we hold
- require the erasure of personal information concerning you in certain situations

- receive the personal information concerning you which you have provided to us, in a structured, commonly used and machinereadable format and have the right to transmit those data to a third party in certain situations
- object at any time to processing of personal information concerning you for direct marketing
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- object in certain other situations to our continued processing of your personal information
- otherwise restrict our processing of your personal information in certain circumstances
- [claim compensation for damages caused by our breach of any data protection laws]

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK

Information Commissioner's Office (ICO) on individuals' rights under the General Data Protection Regulation.

If you would like to exercise any of those rights, please:

- Email Caro Syson at <a href="help@pocketpa.com">help@pocketpa.com</a> our Data Protection Officer
- let us have enough information to identify you (eg registration details),
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
- let us know the information to which your request relates including any account or reference numbers, if you have them

### Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

### How to complain

We hope that we can resolve any query or concern you raise about our use of your information.

The General Data Protection Regulation also gives you the right to lodge a complaint with a supervisory authority, in particular in a European Economic Area state or in the United Kingdom if you work, normally live or if any alleged infringement of data protection laws occurred in the relevant state. The supervisory authority in the UK is the Information Commissioner who may be contacted at https://ico.org.uk/concerns/.

### Changes to this privacy policy

This privacy policy was published on 15<sup>th</sup> October 2022 and last updated on 15<sup>th</sup> October 2022.

We may change this privacy policy from time to time, when we do we will inform you via our website.

How to contact us

Please contact us if you have any questions about this privacy notice or the information we hold about you.

## Do you need extra help?

If you would like this website privacy policy in another format (for example: audio, large print, braille) please contact us (see 'How to contact us' above).