

PRIVACY POLICY

This Privacy Policy sets out the data processing practices carried out through the use of the internet and any other electronic communications networks by Meshh Limited (company number 06718177) of 2 Bowood Road, London, England, SW11 6PE (and any of its group companies) (**Meshh, we or us**).

We have appointed a data privacy champion who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy champion using the details set out below.

CONTACT DETAILS

Full name of legal entity:	Meshh limited
Title of data privacy champion:	CEO
Email address:	dataprotection@meshh.com
Postal address:	Meshh Limited, 2 Bowood Road, London, England, SW11 6PE

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority 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.

This policy applies to the following websites <https://meshh.com/> and any other website or online platform owned or operated by us and/or linking to this Privacy Policy (each a **Website**).

Meshh Limited will be the controller and responsible for your personal data.

1 DATA COLLECTED

- 1.1 Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).
- 1.2 We collect personal information from visitors to this Website which we have grouped together as follows:
 - (a) Identity Data such as first name, last name and date of birth;
 - (b) Contact Data such as address, email address and telephone numbers;
 - (c) Technical Data such as internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website;
 - (d) Usage Data such as information about how you use our website, products and services; and
 - (e) Marketing and Communications Data such as your preferences with regards to receiving marketing from us.
- 1.3 Only Technical and Usage Data are collected automatically when you visit any of the Websites (please see the section on how we collect your personal data for further information).

2 HOW WE COLLECT YOUR PERSONAL DATA

- 2.1 We use different methods to collect data from and about you including through:
 - (a) **Direct interactions.** You may give us your Identity, Contact, and Marketing and Communications Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give us some feedback.
 - (b) **Automated technologies or interactions.** As you interact with our website(s), we may automatically collect Technical and Usage Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies. Please see the section on cookies below.

3 USE OF PERSONAL INFORMATION

3.1 We process personal information collected via this Website for the purposes of:

- (a) providing and personalising our services;
- (b) dealing with your enquiries and requests;
- (c) maintaining information as a reference tool or general resource;
- (d) carrying out market research campaigns; and
- (e) providing you with information about products and services.

3.2 We may use your data to send you information regarding our products or services, products or services offered by other companies within our group but only if you specifically consent to receiving such marketing materials. You may withdraw your consent to receive these marketing materials at any time by selecting the unsubscribe button included in all communications sent to you by us. Please note, you are under no obligation to provide us with your data but if you do not, we may not be able to provide you with the services listed at (a), (b) or (e) above.

3.3 We may also use and disclose information in aggregate (so that no individuals are identified) for marketing and strategic development purposes.

3.4 We have set out below, all the ways we use your personal data, and the legal bases on which we rely to do so.

Purpose	Category of Data	Lawful basis for processing including basis of legitimate interest
Administering and protecting our business and our websites: (a) (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) 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) (b) Necessary to comply with a legal obligation
To manage our relationship with you (a) Notifying you of changes to our privacy policy (b) Contacting and corresponding with you in relation to employment opportunities	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated)
To use data analytics to improve our website, marketing, customer relationships and experiences	(a) Technical (b) Usage	Consent (provided or declined when you interact with the cookie banner on our website). You may withdraw your consent by clicking on the 'manage consent' button at the bottom of our website.
To deliver relevant marketing materials to you (in the form of our newsletter) and to measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Consent (you will only receive our newsletter where you have separately consented to doing so by signing up to the newsletter. You may remove your consent at any time by following the opt-out links which can be found on all communication we will send to you)

4 DISCLOSURES

We may disclose your personal data:

- Where required by law, government, competent authorities, or the courts or to establish, exercise or defend our legal rights, and for the purposes of preventing crime and fraud, for example, we may share personal data with our professional advisors, investigators, or credit reference agencies. Legal basis: compliance with a legal obligation or our legitimate interests in protecting our business and preventing fraud.
- With members of our corporate group, insofar as it is reasonably necessary for the purposes set out in this privacy policy. Legal basis: our legitimate interests in structuring our business and business assets in the most efficient means possible.
- Our suppliers, and subcontractors, as necessary for the purposes set out in this policy. We use the following categories of service provider: IT service providers including Google, and third party hosting providers including Amazon Web Services. Legal basis: our legitimate interests in outsourcing business functions.
- If involved in an investment, merger, acquisition, or sale of our organisation or assets, personal data we hold may be shared with other parties to the transaction. Legal basis: the legitimate interests of us, our shareholders, customers, and other parties to a transaction, unless those interests are outweighed by prejudicial impacts upon you.

5 SECURITY

We take the security of your information very seriously, and have controls and processes to minimise the risk of a data breach occurring, though you must take responsibility when visiting other websites, even if following a link to them from our Website.

We have put in place procedures to deal with any suspected or actual personal data breach and will notify you or the appropriate regulator where we are legally required to do so, and we will make all efforts to minimise the impact.

We may use external companies to process information which are based overseas and outside Europe. We ensure that they have strict checks and controls in place to keep your information safe.

6 DOCUMENT RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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

7 OTHER WEBSITES

Our Website may contain links to other websites which are outside our control and are not covered by this Privacy Policy. If you access other sites using the links provided, the operators of these sites may collect information from you which will be used by them in accordance with their privacy policy, which may differ from ours.

8 ACCESS RIGHT

Under certain circumstances, you have rights under data protection laws in relation to your personal data such as:

- Requesting access to your personal data;
- Requesting a correction to your personal data;
- Requesting erasure of your personal data;
- Objecting to the processing of your personal data;
- Requesting a restriction on the processing of your personal data;
- Requesting a transfer of your personal data; and/or
- Your right to withdraw your consent.

If you wish to exercise any of these rights please email us at dataprotection@meshh.com. No fee is usually required to exercise your rights under data protection law, however we may charge a reasonable fee if your request is clearly unfounded, repetitive, excessive or if you require further copies of the information that we have already sent you.

9 INTERNATIONAL TRANSFERS

We store your personal data in the UK and EU. To the extent we transfer your personal data to a location outside the UK or EU which does not provide an adequate level of protection for your personal data, we will enter into contracts approved by the European Commission or UK Information Commissioner's Office which give personal data similar protection to that which it has in the UK or EU. For more information on this, please contact us at dataprotection@meshh.com.

10 INTERNET-BASED TRANSFERS

Given that the Internet is a global environment, using the Internet to collect and process personal data necessarily involves the transmission of data on an international basis. Therefore, by browsing this Website and communicating electronically with us, you acknowledge and agree to our processing of personal data in this way.

11 COOKIE POLICY

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
- **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

Use of cookies:

We process personal information collected via this Website for the purposes of dealing with your enquiries and requests.

You can find more information about the cookies we use, the purposes for which we use them and how you can exercise your choices regarding our use of your cookies at <https://meshh.com/cookie-policy/>.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.