

## **PRIVACY POLICY**

### **A. GENERAL INFORMATION**

1. This Privacy Policy applies to personal data (as defined in the GDPR) which is processed through one of the following brands: Salt Holdings, Salt Technologies, Ya Takeaway
2. The full details of the legal entity is Salt Holdings Ltd, a limited company with registered number 12312414. Salt Holdings Ltd is registered in the United Kingdom at 12 Park Lane, Tilehurst, Reading, Berkshire, RG31 5DL and operates at 30 Queen's Road, Reading, Berkshire, RG1 4AU.
2. The data controller of personal data processed in relation to one of the above-mentioned brands is always Salt Holdings Ltd, hereafter also referred to as the "data controller", "we" or "us".
3. The data controller has designated a data protection officer according to Article 37 GDPR who can be contacted at [gdpr@salt-technologies.com](mailto:gdpr@salt-technologies.com).
4. 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 (<https://ico.org.uk>). Please read: <https://ico.org.uk/your-data-matters/raising-concerns/> for details of how to do this.

### **B. BASIC PRINCIPLES OF DATA PROCESSING**

1. We process personal data in accordance with applicable data protection laws and regulations. This means that personal data is processed only when there is a legal basis for processing it.
2. Where we have your consent, we may use personal data that has been collected by cookies, including to send marketing communications such as our newsletter to you (as applicable, depending on the consent you have provided). You may withdraw your consent at any time, however, this will not affect the lawfulness of any data processing carried out before your consent was withdrawn.
3. We are entitled to provide information on the personal data we process, and to provide access to that personal data, to law enforcement or emergency response agencies in accordance with applicable law, and to process data, where necessary, in order to comply with our legal obligations.
4. When contacting us (for example, via a contact form or email), the data can be stored for the purposes of processing the inquiry and in the event that questions arise. In any case, inquiries are first processed at our office in the United Kingdom.
5. Further details about the purposes for which we process your data, how we process your data and who your data is disclosed to are set out below.

### **C. COLLECTION OF ONLINE ACCESS DATA (LOG FILES)**

1. We may automatically collect information when you access our websites. We collect data on requests for access to the server on which our website is hosted (server log files). The access data includes the name of the retrieved web page file, date and time of retrieval, transmitted data

volume, notification of successful retrieval, browser type and version, the user's operating system, referrer URL (the site used prior to this visit), IP address and the requesting provider.

2. We will usually process the log data on an anonymous basis, without reference to other information identifying the relevant user or any other creation of a profile, and only for statistical evaluations for the purposes of the operation, security and optimization of our website. However, we reserve the right to check the log data at a later date and to use this data with other information that may identify a user if we have reasonable grounds to suspect unlawful use or activity.

#### **D. NEWSLETTERS**

1. We may send newsletters, emails and other electronic notifications with promotional information, which we will collectively refer to as "newsletters", only with the consent of the recipient. If you subscribe to our newsletters, you agree to receive the newsletters.

2. We keep a record of subscriptions to our newsletters in order to demonstrate that the registration process is in accordance with legal requirements. This includes the storage of the login and confirmation time as well as the IP address.

3. Newsletters are sent by "Zoho Campaigns", a marketing platform provided by Zoho Corporation BV, Beneluxlaan 4B, 3527 HT, Utrecht, The Netherlands.

5. The email addresses of our newsletter recipients, as well as their other data described in point 9 of this section, are stored on Zoho's servers. Zoho uses this information to send and evaluate the newsletters on our behalf. In addition, Zoho may use this information to optimize or improve its own services, for example, for the technical optimization of the dispatch and presentation of newsletters, or for financial purposes, in order to determine the recipients' countries of residence. However, Zoho does not use the data of our newsletter recipients to write to them, and it does not forward the data to third parties.

6. We trust the reliability and the IT and data security of Zoho, and you can view Zoho's Privacy Policy here: <https://www.zoho.com/en-uk/privacy.html>

7. To subscribe to newsletters, all you have to do is provide us with your email address. We also ask for your first and last name and your phone number, both of which are optional.

8. Statistical surveys and analysis – The newsletters retrieve technical information, such as that regarding the browser and your system as well as your IP address and the time of retrieval. This information is collected for the improvement of the service, based on technical data or the target groups, their behaviour, retrieval locations (which can be determined using the IP address) and access times.

9. Statistical surveys also determine whether newsletters have been opened, when they are opened and which links are clicked. This information can be assigned to individual newsletter recipients for technical reasons. However, neither we nor Zoho are attempting to observe individual users. The evaluations help us identify the reading habits of our users and adapt our content to them or send different content according to their interests.

10. There are instances where we direct newsletter recipients to the Zoho website. For example, our newsletter contains a link that enables the newsletter recipients to access newsletters online (in the event of display problems with the email program). In addition, newsletter recipients may

subsequently modify their data, such as their email address, on the Zoho website and if a user wishes to view Zoho's Privacy Policy, this is only available on its website.

11. In this context, please note that Zoho's website uses cookies, meaning that if you visit a Zoho website your personal data may be processed by Zoho, its partners and service providers (such as Google Analytics). We have no influence on this data collection. Please refer to Zoho's Privacy Policy for further information. We would also like to point out the opportunities to raise objections against data collection for advertising purposes at <http://www.youronlinechoices.com/> for the European Economic Area.

12. Unsubscribing from the newsletter – If you wish to receive the newsletter, you are required to give your consent for all the data processing set out in point 9 of this section. However, you may unsubscribe from our newsletter at any time, meaning you may revoke your consent. In this case, your consent to receiving the newsletter, having your data sent via Zoho and the statistical analyses, will all simultaneously expire.

## **E. COOKIES AND REACH MEASUREMENT**

### **WHAT ARE COOKIES?**

Our websites use cookies. A cookie is a small text file stored on your device when you are visiting websites. We use cookies mainly to analyse and improve your experience on our websites and for marketing purposes. We use the term "cookies" here for techniques such as cookies, Flash cookies, social media plugins, pixel tags and web beacons. Cookies set by us are called "first-party cookies". Cookies set by parties other than us are called "third-party cookies". Third-party cookies enable third-party features or functionality to be provided on or through the website (e.g. personalized advertising and analytics). You will find further information on this below.

### **WHAT KIND OF COOKIES DO WE USE?**

There are different cookies for different purposes. Information collected by these cookies may include the following (depending on the cookie in question): device type, unique browser identifier, IP address, unique cookie identifier, browser type, language, country, operating system, system settings, information about your interaction with our sites such as purchases, indicated preferences and click behaviour. We do not control the functioning of cookies from third parties. The respective third parties are responsible for such cookies and for their own data processing.

### **STRICTLY NECESSARY COOKIES**

These cookies enable services you have specifically asked for. They are essential to enable you to move around the website and use its features, such as accessing secure areas. Without using these cookies, services you have asked for, such as shopping baskets or e-billing, cannot be provided.

### **ANALYTICAL OR PERFORMANCE COOKIES**

These cookies collect anonymous information on the pages that you have visited. They collect information about how visitors use a website, for instance, which pages visitors go to most often, how they move around our website and if they get error messages from webpages. These cookies do not collect data that personally identifies any user. They help 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 cookies remember choices you make to improve your experience. They are used to recognize you when you return to our website. They allow the website to remember choices you make (such as your username, language or the region you are in) and provide enhanced, more personal features such as greeting you by name. They can also be used to remember changes you have made to text size, fonts and other parts of our website that you can customize as well as to provide services you have asked us for, such as watching a video or commenting on a blog. The information these cookies collect may be anonymized and they cannot track your browsing activity on other websites.

#### **TARGETING OR ADVERTISING COOKIES**

These cookies collect information about your browsing habits in order to make advertising relevant to you and your interests. They record your visit to our website, the pages you have visited and the links you have followed. They are used to deliver adverts that are more relevant to you and your interests. These cookies are also placed by third parties (including advertising networks) with our permission. The cookies remember which pages of our website you have visited, and this information is shared with other organizations such as advertisers. It may be used to deliver adverts to you on third-party websites or applications based on your online activity.

#### **HOW TO DISABLE COOKIES AT ANY TIME?**

You can change your browser settings to delete or prevent certain cookies from being stored on your computer or mobile device. The 'Help' section in your browser should provide information on how to manage the cookie settings in the browser.

However, it should be noted that the blocking of cookies might affect site functionality. If you want to accept cookies from us but not cookies from third parties, you can typically (depending on your browser) select "Block third-party cookies" in your browser settings.

How to disable cookies in different browsers: <http://www.aboutcookies.org/how-to-delete-cookies>

If you wish to deny the site from placing cookies on your device (e.g. computer or mobile phone), you may block cookies in your browser settings:

Internet Explorer: <https://support.microsoft.com/help/17442/windows-internet-explorer-delete-manage-cookies>

Chrome: <http://www.google.com/support/chrome/bin/answer.py?hl=en&answer=95647>

Mozilla Firefox: <http://support.mozilla.com/en-US/kb/Cookies>

Safari: <http://support.apple.com/kb/PH5042>

Opera: <https://www.opera.com/help/tutorials/security/privacy/>

Adobe (Flash cookies): <http://www.adobe.com/privacy/policies/flash-player.html>

For other browsers, please check the support website for your browser.

Furthermore, you can get more information about cookies at <http://www.allaboutcookies.org/> and <https://www.networkadvertising.org/understanding-online-advertising/what-are-my-options>.

#### **F. GOOGLE ANALYTICS**

1. To collect “clickstream” data (such as IP address, date and time of the visit, reference URL, the pages visited on our website, and information about the browser being used) we use Google Analytics, a web analysis service from Google Inc. (“Google”). Google uses cookies – text files that are stored on users’ devices and that allow an analysis of the use of the website. The information generated by the cookie is generally transferred to a Google server in the USA and stored there.
2. Google uses this information on our behalf to evaluate the use of the website by users in order to compile reports on the activities within the website, and to provide additional services related to the use of the website as well as Internet usage. Pseudonymous usage profiles of the users can therefore be created from the processed data.
3. We only use Google Analytics with IP anonymization enabled. This means that the IP addresses of the users are abbreviated by Google within the member states of the European Union or in other contracting states of the European Economic Area. Only in exceptional cases will the full IP address be transferred to a Google server in the US and abbreviated there.
4. The IP address transmitted by the user’s browser is not merged with other data from Google. Users can prevent the storage of cookies by setting their browser software accordingly; users may also block the collection of data generated by the cookie and related to their use of the website for Google, as well as the processing of such data by Google, by downloading and installing the browser plugin available at <https://tools.google.com/dlpage/gaoptout?hl=en>.
5. For further information on Google’s use of the data for advertising purposes, as well as settings and opportunities to raise objections, please refer to the following Google webpages: <https://www.google.com/intl/en/policies/privacy/partners/> (“How Google uses data when you use our partners’ sites or apps”), <http://www.google.com/policies/technologies/ads> (“Data usage for advertising purposes”), <http://www.google.com/settings/ads> (“Control the information Google uses to show you ads”) and <http://www.google.com/ads/preferences/> (“Make the ads you see more useful to you”).

## **G. ONLINE CUSTOMERS**

1. Where you place an order for products online or make an inquiry with us, data processing is necessary for the performance of that contract or in order to take steps at your request before entering into a contract.
2. We pass on users’ personal data to third parties if this is necessary for billing purposes (for example, to a payment service provider such as Stripe) or for other purposes necessary to meet our contractual obligations to our customers. This includes the transmission of customer data contained in orders to the local retailer selected by the customer, to assist in the fulfilment of an order, for the purpose of providing customer support and for order fulfilment.

## **H. PRODUCT LIABILITY**

1. In the event that our products are involved in accidents or lead to damages or personal injury, we may process personal data from end-users in order to meet obligations relating to such cases. We process such data to resolve product liability claims, to determine the cause of potential product defects and, if necessary, to determine compensation for damages or personal injury.

2. In product liability cases, we may pass on end-users' personal data to third parties, in particular, to insurance companies, suppliers and lawyers, if this is necessary for determining the cause of defect or processing the compensation, or for other purposes that are required to meet our obligations towards end-users.

#### **I. DATA SECURITY**

We put in place organizational, contractual and technical security measures that correspond to the latest technology, in order to ensure compliance with applicable data protection laws, and to ensure that the data processed by us is protected against accidental or intentional manipulation, loss, destruction or access by unauthorized persons.

#### **J. DATA SUBJECT RIGHTS**

1. Upon request, you are entitled to receive information about your personal data that we process. In such cases, we may ask you to provide us with detailed information regarding possible circumstances that have led to the processing of your data by us.
2. You also have the right to demand rectification of inaccurate data held about you, request the deletion of your personal data, assert your rights to the portability of your personal data, restrict or object to the processing of your data, and file a complaint with the relevant supervisory authority in the event of suspected unlawful data processing.
3. You may, at any time, withdraw any consent to data processing that you have provided, however, this will not affect the lawfulness of any data processing carried out before your consent was withdrawn.

#### **K. RETENTION OF DATA**

In general, and unless otherwise described in this Privacy Policy, data stored with us is deleted as soon as it has served its purpose and/or to the extent that there is no statutory retention requirement. In the event of legal disputes, we reserve the right to store data for longer.

#### **L. CHANGES TO THE PRIVACY POLICY**

We reserve the right to change the Privacy Policy in order to adapt it to changes to the law, the website or our data processing. However, this only applies to declarations concerning data processing. If user consent is required or if the Privacy Policy contains provisions setting out the contractual relationship with the user, the changes will only be made with the consent of the user.