

Privacy Notice

1. INTRODUCTION

- 1.1. We respect your privacy and we want you to feel confident and comfortable with how your personal information will be looked after or used by us when you access our website, purchase, use or access any of our devices, platforms or applications (together, our Services), contact us, or otherwise interact with us. We have prepared this privacy notice (Privacy Notice) to explain to you how we collect, use, store, and disclose your personal information in connection with our business, including via the website www.zelp.co (Website) and our Services. It also explains what rights you have in relation to accessing or changing your personal information. Please take the time to read and understand this Privacy Notice.
- 1.2. Our Website and Services are not intended for children. We do not knowingly collect or maintain the personal information of children under the age of 13. If you are under the age of 13, please do not access our Website. We will take appropriate steps to delete the personal information of persons under the age of 13.

2. ABOUT US

- 2.1. We are ZELP LTD, a limited liability company registered in England and Wales under company number 10802594 with its registered office at 7 Savoy Court, London, United Kingdom, WC2R 0EX (we, us, our, ZELP).
- 2.2. If you have any questions about this Privacy Notice or our use of your personal information, you can contact us as follows:

Email: contact@zelp.co
- 2.3. You can also contact us to inform us of any changes to the personal information we hold about you. This will help us to make sure that our records are accurate and up to date.

3. INFORMATION WE COLLECT ABOUT YOU

- 3.1. We will collect, use, store and transfer different kinds of information that you provide to us when you:
 - 3.1.1. Make an enquiry, provide feedback, make a complaint or any other correspondence over the phone, by email or on the Website.
 - 3.1.2. Report a problem with the Website or our Services.
 - 3.1.3. Subscribe to our newsletter and/or mailing lists.
 - 3.1.4. Purchase any of our Services from us.
 - 3.1.5. Submit or upload information and/or data using our Services.
 - 3.1.6. Use the Website generally. This means that we will collect certain information about how you use the Website and the device that you use to access the Website, even where you have not created an account or logged in. This information may include login data, IP address, page views, searches, requests, orders, pre-approvals, confirmations and other actions on the Website, and may be collected by a third-party website analytics service provider on our behalf and/or may be collected using cookies or similar technologies. For more information on cookies please read the 'COOKIES' section below.

- 3.2. Such information may include (depending on the circumstances):
- 3.2.1. **Identity and contact data:** This includes titles, names, addresses, email addresses, phone numbers and other contact details you may provide to us.
 - 3.2.2. **Financial data:** This may include billing addresses, credit/debit card details and bank account details.
 - 3.2.3. **Website usage data:** This includes information about your interactions with the Website, such as login data, IP address, page views, searches, and other actions on the Website;
 - 3.2.4. **Technical data:** For example, your geographical location, information about the device you use to access the Website or our services such as your hardware model, mobile network information, unique device identifiers.
 - 3.2.5. **Farm information:** This includes information about the type and number of livestock and information collected by our Services relating to such livestock.
 - 3.2.6. **Marketing and communications data:** This includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- 3.3. In certain circumstances, we will receive information about you from third parties. For example:
- 3.3.1. **Service providers:** We may collect personal information from our website developers, IT support providers, customer service support providers, marketing services providers and payment services providers (who may be based inside or outside the UK and/or the EU).
 - 3.3.2. **Publicly available sources:** We may use publicly available sources for instance to carry out identity and compliance checks.
 - 3.3.3. **Other third parties:** We might also receive information about you from third parties if you have indicated to such third party that you would like to hear from us.

4. USE OF YOUR INFORMATION

- 4.1. We use your information in the following ways:
- 4.1.1. **Provide access to the Website:** To provide you with access to the Website in a convenient and optimal manner.
 - 4.1.2. **Services:** To provide customer service and support in relation to our Services.
 - 4.1.3. **Relationship management:** To manage our relationship with you, which may include notifying you about changes to our EULA or Privacy Notice.
 - 4.1.4. **User and customer support:** To provide user or customer service and support by dealing with enquiries or complaints about the Website and/or our Services and share your information with our website developers, IT support providers, payment services provider, and security providers as necessary to provide the necessary support.
 - 4.1.5. **Marketing:** To keep in contact with you about our news, events, new features, products or services that we believe may interest you, provided that, where necessary, we have the requisite permission to do so, or where it is in our legitimate interests to provide you with marketing communications where we may lawfully do so.

- 4.1.6. **Research and Analytics:** To carry out research about general engagement with our Website, Services and to use data analytics to improve our Website, Services, marketing, customer relationships and experiences.
- 4.1.7. **Compliance with policies, procedures and laws:** To enable us to comply with our policies and procedures and enforce our legal rights, or to protect the rights, property or safety of our staff and share your information with our technical and legal advisors.

5. DISCLOSURE OF YOUR INFORMATION

- 5.1. We do not sell your personal information. However, we may disclose it to certain third parties in order to allow us to provide the Website and our Services to you, enforce our rights or to comply with legal or regulatory obligations. Such third parties include:
 - 5.1.1. **Our service providers:** Service providers we work with to deliver our business, who are acting as processors and provide us with:
 - (a) development and hosting services;
 - (b) payment services;
 - (c) IT, system administration and security services;
 - (d) marketing and advertising services; and
 - (e) delivery services.
 - 5.1.2. **Regulators and governmental bodies:** HM Revenue & Customs, regulators, governmental bodies and other authorities acting as processors or separate controllers who require reporting of processing activities in certain circumstances.
 - 5.1.3. **Distributors and resellers:** any third party distributor or reseller with whom you have entered into an agreement to purchase or lease our devices.
 - 5.1.4. **Marketing partners:** any selected third party that you consent to our sharing your information with for marketing purposes.
 - 5.1.5. **Prospective sellers and buyers of our business:** any prospective seller or buyer of such business or assets, only in the event that we decide to sell or buy any business or assets.
 - 5.1.6. **Other third parties (including professional advisers):** any other third parties (including legal or other advisors, regulatory authorities, courts, law enforcement agencies and government agencies) where necessary to enable us to enforce our legal rights, or to protect the rights, property or safety of our employees or where such disclosure may be permitted or required by law.
- 5.2. We require all third parties to respect the security of your personal data and to treat it in accordance with the law.

6. LEGAL BASIS FOR PROCESSING YOUR PERSONAL INFORMATION

- 6.1. We will only process your personal information where we have a legal basis to do so. The legal basis will depend on the purposes for which we have collected, and use, your personal information. In almost every case the legal basis will be one of the following:
 - 6.1.1. Performance of your contract with us and the provision of our Services to you.

- 6.1.2. Your consent (where we request it).
 - 6.1.3. Our legitimate interests or the legitimate interests of a third party (where appropriate).
 - 6.1.4. Where we need to comply with a legal or regulatory obligation.
- 6.2. Where we use your information for our legitimate interests (or that of a third party), we make sure that we take into account any potential impact that such use may have on you. Our legitimate interests (or those of a third party) do not automatically override yours and we will not use your information if we believe your interests should override ours, unless we have other grounds to do so (such as your consent or a legal obligation).

7. WHERE WE STORE YOUR PERSONAL DATA

- 7.1. The personal information that we collect may be transferred to, and stored at, a destination outside the European Economic Area (EEA) or the United Kingdom (UK), including countries, which have less strict, or no data protection laws, when compared to those in Europe or the UK.
- 7.2. Whenever we transfer your information as described in paragraph 7.1 above, we will take steps which are reasonably necessary to ensure that adequate safeguards are in place to protect your personal information and to make sure it is treated securely and in accordance with this Privacy Notice. In these cases, we rely on approved data transfer mechanisms to ensure your information is subject to adequate safeguards in the recipient country. If you are located in the EEA or the UK, you may contact us for a copy of the safeguards which we have put in place to protect your personal information and privacy rights in these circumstances.

8. PROTECTION OF YOUR INFORMATION, SECURITY AND PASSWORDS

- 8.1. We have put in place appropriate security measures to prevent your personal data from being accidentally destroyed, lost, used or accessed in an unauthorised way. We also take steps to ensure that we retain your personal information for only as long as it is necessary to fulfil the purposes we collected it for, taking into account the amount, nature and sensitivity of the data.
- 8.2. Unfortunately the transmission of information using the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of data transmitted to our Website and/or our Services.

9. THIRD PARTY WEBSITES

- 9.1. The Website may contain links to websites that are operated by third parties including our affiliates. We do not control and accept no liability or responsibility for those websites or feeds and this Privacy Notice does not apply to those websites. Please consult the terms and conditions and privacy policy of the third party responsible for such advertisements or websites to find out how they collect and use your personal information and to establish what they may use your personal information for.

10. YOUR RIGHTS

- 10.1. In some situations, you can ask for access to your personal data, correct your data, delete your data, or object to our use of your data. If you wish to exercise any of those rights, please contact us using the contact details set out at the top of this Privacy Notice.

- 10.2. Subject to certain legal conditions, you have a number of rights in respect of the personal information we hold about you. These include:
- 10.2.1. **Information:** you have the right to be informed of the ways we use your information, as we seek to do in this Privacy Notice;
 - 10.2.2. **Access:** you have the right to request, free of charge, access to a copy of the personal information that we hold about you;
 - 10.2.3. **Rectification:** you can ask us to change, correct, or complete any inaccurate, incomplete, or out-of-date personal information that we hold about you;
 - 10.2.4. **Consent:** If you have given us your consent to use your personal information (for example, for marketing purposes), you can withdraw your consent at any time;
 - 10.2.5. **Objection:** you can object to our processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You can also object to our use of your personal information for direct marketing purposes;
 - 10.2.6. **Portability:** In certain circumstances, you can ask us to provide you or a third party with some of the personal information that we hold about you in a structured, commonly used, electronic form;
 - 10.2.7. **Restriction:** you can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it; and
 - 10.2.8. **Erasure:** you can ask us to delete your personal information where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it.
- 10.3. **Exercising your rights**
- 10.3.1. If you wish to exercise your rights, please contact us using the contact details set out at the top of this Privacy Notice. You will not have to pay a fee to exercise the above rights, however, we reserve the right to charge you a reasonable administrative fee for any manifestly unfounded or excessive requests concerning your access to your information.
 - 10.3.2. Please also note that we may ask for proof of your identity. This is a security measure to ensure that we do not disclose personal information to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.
 - 10.3.3. We will try to respond to all legitimate requests within one month. Sometimes it may take us longer if your request is complex or you have made several requests. In this case, we will notify you and keep you updated.
 - 10.3.4. Please also be aware that not all of those rights are absolute and there may be circumstances in which we will not fully comply with your request because of a specified legal ground or exemption.
- 10.4. **Right to lodge a complaint:** 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), as well as the relevant authority in your country of work or residence, if you do not believe that we have handled your request in an appropriate manner. We would appreciate 16171444-3 the opportunity to deal with your concerns before you complain to the ICO/the relevant authority – you can contact us using the contact details set out at the top of this Privacy Notice.

11. COOKIES AND SIMILAR TECHNOLOGIES

- 11.1. We use cookies and similar technologies to ensure that you get the most out of our Website. Cookies are small amounts of information in the form of text files which we set on and access from your device provided we have your consent, where legally required. Cookies allow us to monitor your use of the Website and simplify your use of the Website. The cookies we use fall into the following categories:
- 11.1.1. **Session cookies:** These allow our Website to link your actions during a particular browser session. These expire each time you close your browser and do not remain on your device afterwards.
 - 11.1.2. **Persistent cookies:** These are stored on your device in between browser sessions. They allow your preferences or actions across the Website to be remembered. These will remain on your device until they expire, or you delete them from your cache.
 - 11.1.3. **Strictly necessary cookies:** These cookies are essential for you to be able to navigate the Website and use its features. Without these cookies, the services you have asked for could not be provided.
 - 11.1.4. **Performance cookies:** These cookies collect information about how you use our Website, e.g. which pages you go to most often.
 - 11.1.5. **Functionality cookies:** These cookies allow the Website to remember the choices you make (such as your user name, language, last action and search preferences) and provide enhanced, more personal features.
- 11.2. If you do not wish for cookies to be installed on your device, you can change the settings on your browser or device to reject cookies. For more information about how to reject cookies using your internet browser settings please consult the "Help" section of your internet browser (or alternatively visit <http://www.aboutcookies.org>). Please note that, if you do set your Internet browser to reject cookies or otherwise withdraw your consent in relation to cookies, you may not be able to access all of the functions of the Website.

12. CHANGES TO OUR PRIVACY NOTICE

Our Privacy Notice may change so please remember to check back from time to time. Where we have made any changes to this Privacy Notice, we will post these to our Website or otherwise notify you of any material changes by email.

This Privacy Notice was last updated on November 17th 2020.