



Privacy Policy, Data Protection Statement & GDPR Compliance

May 2020

This policy is for KinnsAI Ltd, operating in name as catsAi, with the website catsai.co.uk

Data protection is a matter of trust and your trust is important to us. We respect your privacy and personal space.

The protection and the lawful collection, processing and use of your personal data is therefore an important concern. To ensure that you feel secure when visiting our website or otherwise engaging with our company, we want you to know that we strictly observe the legal obligations set forth in the GDPR and the national data protection laws. We would like to inform you here about our data collection and data use as it pertains to KinnsAI's compliance with GDPR regulations.

For us, data protection is a corporate matter of high priority and we only work with partners who can also demonstrate an appropriate level of data protection. We only process your data if you have given us your consent. This consent may be implicit — based on the existence of a prior contact or a potential or active contract. Otherwise, it will be explicit — based on your expression of desire to have us process data to further a legitimate business interest.

We are pleased to inform you in detail about the handling of your data within our company.

Following this introduction, we present to you KinnsAI's data protection policy which covers both the currently applicable national legal framework and the requirements of the General Data Protection Regulation (GDPR) valid throughout Europe from 25 May 2018.

You can print or save this document by using the usual functionality of your browser. The following data protection declaration explains which data is collected, which data we process, and ultimately, how we use, hold, correct, and dispose of data.



I. Name and address of the data controller

The data controller as defined in the General Data Protection Regulation and other national data protection laws, as well as other data protection regulations, is:

Stuart Ware-Lane

c/o KinnsAi Limited

2 Malford Road

Snaresbrook

London

E18 2DX

Tel

Email: Stuart@catsai.co.uk

II. General information on data processing

1. Scope of processing of personal data

We only collect and use personal data of our customers, employees, contractors, applicants and website users insofar as this is necessary to pursue the mission statement of our organization to provide high-quality products, services and information to the public. The collection and use of personal data takes place routinely only with individuals' express or implied consent. An exception applies in those cases where prior consent cannot be obtained for factual reasons and the processing of the data is otherwise permitted by law.

2. Legal basis for the processing of personal data

Insofar as we obtain the consent of the data subject for the processing of personal data, Art. 6 para. 1 lit. a of the EU General Data Protection Regulation (GDPR) shall serve as the legal basis for the processing of personal data.

In the processing of personal data required for the performance of a contract to which the data subject is a party, Art. 6 para. 1 lit. b GDPR shall serve as the legal basis. This also applies to processing operations that are necessary to carry out pre-contractual measures.

Insofar as the processing of personal data is required to fulfil a legal obligation to which our company is subject, Art. 6 para. 1 lit. c GDPR shall serve as the legal basis.



In the event that the vital interests of the data subject or another natural person require the processing of personal data, Article 6(1)(d) GDPR shall serve as the legal basis.

If processing is necessary to safeguard a legitimate interest of our company or a third party and if the interests, fundamental rights and freedoms of the data subject do not outweigh the first-mentioned interest, Art. 6 para. 1 lit. f GDPR serves as the legal basis for processing.

3. Data erasure and storage time

The personal data of the data subject will be deleted or blocked as soon as the purpose of storage ceases to apply. Furthermore, data may be stored if this has been provided for by laws or other provisions to which the data controller is subject. The data will also be blocked or deleted if a storage period prescribed by the aforementioned standards expires, unless there is a need for further storage of the data for the conclusion or fulfilment of a contract.

III. Provision of the website and creation of log files

1. Description and scope of data processing

Every time you visit our website, our system automatically collects data and information from the computer system of the calling computer.

The following data may be collected:

- Information about the browser type and version used
- The user's operating system
- The user's Internet service provider
- The IP address of the user
- Date and time of access
- Websites from which the user's system reaches our website
- Websites accessed by the user's system through our website
- Country and language settings of the browser (control page)

The data is also stored in the log files of our system. This data is not stored together with other personal data of the user.

2. Legal basis for data processing

The legal basis for the temporary storage of data and log files is Art. 6 para. 1 lit. f GDPR.

3. Purpose of data processing



The temporary storage of the IP address by the system is necessary to enable the website to be delivered to the user's computer. For this the IP address of the user must remain stored for the duration of the session.

The data is stored in log files to ensure the functionality of the website. In addition, we use the data to optimise the website and to ensure the security of our information technology systems. An evaluation of the data for marketing purposes does not take place in this context.

These purposes also constitute our justified interest in processing personal data as per Art. 6 para. 1 lit. f GDPR.

4. Duration of storage

The data will be deleted as soon as they are no longer necessary to achieve the purpose for which they were collected. In the event that data is collected in order to make the website available, this is the case once each session has ended.

If the data is stored in log files, this will happen after seven days at the latest. Further storage is possible. In this case, the IP addresses of the users are deleted or alienated, so that an assignment of the calling client is no longer possible.

5. Right to objection and removal

Collecting the data in order to make the website available, and saving this data in log files, is necessary in order to operate the website. Therefore, the user does not have a right to object to this.

IV. Use of cookies

a) Description and scope of data processing

Our website uses cookies. Cookies are text files that are stored in the Internet browser or by the Internet browser on the user's computer system. If a user visits a website, a cookie may be stored on the user's operating system. This cookie contains a characteristic character string that enables a unique identification of the browser when the website is called up again. We use cookies to make our website more user-friendly. Some elements of our website require that the calling browser can be identified even after a page change.

The following data is stored and transmitted in the cookies:

- Language settings



- Country settings
- Session settings (Session ID)

We also use cookies on our website which enable an analysis of the user's surfing behaviour.

This allows the following data to be transmitted:

- Search terms used
- Frequency of page views
- Use of website functions
- Subpages visited and session length
- How to get to and from our website

User data that is collected in this way is rendered pseudonymous by technical means. Therefore, it is no longer possible to assign the data to the visiting user. The data will not be stored together with other personal data of our users.

b) Targeting

On our websites, data is collected on the basis of cookie technology to optimise our advertising and the entire online offering. These data are not used to identify you personally, but serve only a pseudonymous evaluation of the use of the homepage. Your data will never be combined with the personal data stored by us. With this technology we can present you advertising and/or special offers and services whose content is based on the information obtained in connection with the clickstream analysis. Our aim is to make our online offer as attractive as possible for you and to present you with advertising that corresponds to your areas of interest.

c) Third party cookies

We may make use of some advertising partners who help to make the internet offer and the websites more interesting for you. For this reason, cookies from partner companies may also be stored on your hard drive when you visit the websites. These are temporary/permanent cookies that are automatically deleted after a specified time. These temporary or permanent cookies (lifetime 14 days to 10 years) are stored on your hard disk and delete themselves after a specified time. We are dedicated to ensuring that the cookies of our partner companies also only contain pseudonymous mostly even anonymous data. Some of our advertising partners may also collect information about which pages you have previously visited or which products you were interested in, for example, in order to be able to show you the advertising that best suits your interests. These pseudonymous



data will never be combined with your personal data. Their sole purpose is to enable our advertising partners to address you with advertising that might actually be of interest to you.

d) How can you prevent the storage of cookies?

Depending on the browser used, you can set that a storage of cookies is only accepted if you agree. If you only want to accept the cookies we use, but not the cookies of our service providers and partners, you can select the setting in your browser "Block third party cookies". Usually, the help function in the menu bar of your web browser shows you how you can reject new cookies and deactivate cookies already received. We recommend that you always log out completely of shared computers that are set so that cookies and flash cookies are accepted.

e) Legal basis for data processing

The legal basis for the processing of personal data using cookies is Art. 6 para. 1 lit. f GDPR.

f) Purpose of data processing

The purpose of implementing technically necessary cookies is to make it easier for users to use the websites. Some of the features on our website cannot be offered without the use of cookies. It must be possible to recognise the browser even after the user goes to a new page on the site.

We use cookies for the following applications:

- Adjusting language settings
- Country settings
- Visitor recognition (session handling)

The user data collected by technically necessary cookies are not used to create user profiles.

The analysis cookies are used to improve the quality of our website and its content. The analysis cookies tell us how the website is being used, which allows us to continuously improve our offerings.

These purposes also constitute our justified interest in processing personal data as per Art. 6 Sec. 1 lit. f GDPR.

g) Duration of storage, possibility of objection and elimination

Cookies are stored on the user's computer and transmitted to our site. Therefore, you as a user also have complete control over the use of cookies. You can adjust your web browser's settings in order to disable or limit the transmission of cookies. Previously saved cookies can be deleted at any time.



This can also be done automatically. If cookies are disabled for our website, you may not be able to use all of the website's features to their fullest extent.

V. Newsletter or Other Corporate Outreach

1. Description and scope of data processing

On our website, we may offer users the opportunity to register by providing personal data. The registration can be realised in different ways (e.g. via telephone, email, through personal contact at trade fairs, submission of business cards, personal contact, etc.). If you are registering on our website, the data is entered into an input screen and transmitted to us and saved. In other cases, our employees enter the data into our systems. The data will not be passed on to third parties unless you consent.

The following data may be collected during the registration process:

- Company
- VAT ID
- Industry
- Title
- First name
- Last name
- Street
- House number
- Postcode
- City
- Region
- Country
- Phone number
- Fax number
- E-mail
- Topic of the message
- Message



If the customer has logged utilizing access data, he or she can send a message and check the box for sending the newsletter. The following data is collected:

- Topic of the message
- Message

If the user is not yet registered, he or she will be registered in this process.

In addition, the following data is collected upon registration:

- Date and time of registration

During the registration process, your consent is obtained for the processing of the data and reference is made to this data protection declaration.

If you actively request information on our website or email us with an inquiry, we may subsequently use your contact data to send you a newsletter. In such a case, the newsletter sent will only contain information relative to our company and its offerings. In addition, the newsletter will also contain an “unsubscribe” function. This will denote your right to “opt-out” and revoke your prior consent.

Apart from use for our email marketing tool (i.e., Salesforce), data is not passed on to third parties in connection with data processing for sending newsletters. The data will be used exclusively for sending the newsletter or making other direct contact with you as contemplated by the type of contact you made with the company.

2. Legal basis for data processing

The legal basis for the processing of the data after registration for the newsletter by the user is Art. 6 para. 1 lit. a GDPR.

3. Purpose of data processing

The collection of the user’s e-mail address serves to send the newsletter. The collection of other personal data as part of the registration process serves to prevent misuse of the services or the e-mail address used.

4. Duration of storage

The data will be deleted as soon as they are no longer necessary to achieve the purpose for which they were collected. The other personal data collected during the registration process will generally be deleted after a period of seven days.

5. Right to objection and removal



The subscription to the newsletter or other contacts may be cancelled by the user concerned at any time. For this purpose there is a corresponding link available in every newsletter or electronic message issued by our company.

VI. Registration

1. Description and scope of data processing

On our website, we offer users the opportunity to register by providing personal data. The data is entered into an input screen and transmitted to us and saved. The data will not be passed on to third parties. The following data is collected during the registration process:

At the time of registration, the following data may also be stored:

- Company
- VAT ID
- Industry
- Title
- First name
- Last name
- Street
- House number
- Postcode
- City
- Region
- Country
- Phone number
- Fax number
- E-mail
- Date and time of registration

In the course of the registration process, the user's consent to the processing of this data is obtained.

2. Legal basis for data processing



The legal basis for processing the data is Art. 6 para. 1 lit. a, b GDPR if the user has given his or her consent.

3. Purpose of data processing

A registration of the user is necessary for the provision of certain contents and services offered by our company.

Similarly, a registration of the user is necessary for the fulfilment of a contract with the user or for the execution of pre-contractual measures.

4. Duration of storage

The data will be deleted as soon as they are no longer necessary to achieve the purpose for which they were collected.

This is the case for those data collected during the registration process to fulfil a contract or to carry out pre-contractual measures when the data is no longer required for the execution of the contract. Even after conclusion of the contract, it may still be necessary to store personal data of the contractual partner in order to fulfil contractual or legal obligations.

5. Right to objection and removal

As a user you have the possibility to cancel the registration at any time. You can change the data stored about you at any time.

You can change or adapt the data in the following ways:

- By phone
- By mail
- By email
- Some data on the website may be changed

If the data is required to fulfil a contract or to carry out pre-contractual measures, premature deletion of the data is only possible insofar as there are no contractual or statutory obligations to the contrary.

VII. Contact form and e-mail contact

1. Description and scope of data processing



A contact form is available on our website which can be used for electronic contact. If a user accepts this possibility, the data entered in the input screen will be transmitted to us and stored.

This data may include:

- Company
- VAT ID
- Industry
- Title
- First name
- Last name
- Street
- House number
- Postcode
- City
- Region
- Country
- Phone number
- Fax number
- E-mail
- Topic of the message
- Message
- Date and time of contact

If the user has logged in with his or her access data, the following data will be stored:

- Topic of the message
- Message
- Date and time of contact

Your consent is obtained for the processing of the data during the sending process and reference is made to this Privacy Policy.

Alternatively, you can contact us via the e-mail address provided. In that case, the user's personal data transmitted by e-mail will be stored.



In this context, the data will not be passed on to third parties. The data is used exclusively for processing the conversation.

2. Legal basis for data processing

The legal basis for the processing of data is Art. 6 para. 1 lit. a GDPR with the user's consent.

The legal basis for the processing of data transmitted in the course of sending an e-mail is Art. 6 para. 1 lit. f GDPR. If the e-mail contact aims at the conclusion of a contract, then additional legal basis for the processing is Art. 6 para. 1 lit. b GDPR.

3. Purpose of data processing

The processing of the personal data from the input mask only serves the aim of handling the establishment of contact. In the event of contact by e-mail, this also constitutes the necessary legitimate interest in the processing of the data.

The other personal data processed during the sending process serve to prevent misuse of the contact form and to ensure the security of our information technology systems.

4. Duration of storage

The data will be deleted as soon as they are no longer necessary to achieve the purpose for which they were collected. For the personal data from the input screen of the contact form and those that were sent by e-mail, this is the case when the respective conversation with the user is finished. The conversation is terminated when it can be inferred from the circumstances that the facts in question have been finally clarified.

The additional personal data collected during the sending process will be deleted after a period of seven days at the latest.

5. Right to objection and removal

The user has the possibility to revoke his or her consent to the processing of personal data at any time. If the user contacts us by e-mail, he can object to the storage of his or her personal data at any time. In such a case, the conversation cannot be continued.

The revocation of the consent and the objection of the storage can take place as follows:

- By phone
- By mail
- By email

All personal data stored in the course of contacting us will be deleted in this case.



VIII. Disclosure of your data to third parties

In order to make our website as user-friendly and convenient as possible, we occasionally use the services of external service providers. KinnsAi has vetted our website service provider and believes that they are also compliant with their privacy obligations under the law. Our due diligence includes the confirmation that our critical business partners also comply with their obligations under GDPR. Data processing is carried out on the legal basis of Art. 6 para.1 lit f (legitimate interest) of the EU General Data Protection Regulation (EU GDPR). Our legitimate interest comprises the optimisation of our online offerings and our website. Because the privacy of our visitors is of paramount importance to us, the IP address is anonymised as early as possible and login or device IDs are converted into a unique key that is not assigned to a person. We are assured that our website service provider does not use it for any other purpose, combine it with other data or pass it on to third parties.

You can object to the aforementioned data processing at any time, as far as it is person-specific. Your objection has no detrimental consequences for you.

IX. Rights of the data subject

Where your personal data is processed, you are deemed a data subject as defined in the GDPR and you have the following rights vis-a-vis the controller:

1. Right to information

You can request confirmation from the controller about whether your personal data is being processed by us.

If such processing has taken place, you can request the following information from the controller:

- the purposes for which the personal data is being processed;
- the categories of personal data being processed;
- the recipients and/or categories of recipients to whom your personal data has been or will be disclosed;
- the planned storage period for your personal data or, if no concrete information can be provided in this regard, criteria for determining the storage period;



- the existence of the right to request from the controller rectification or erasure of personal data, or restriction of processing of personal data concerning the data subject, or to object to such processing;
- the right to lodge a complaint with a supervisory authority;
- any available information on the origin of the data if the personal data are not collected from the data subject;
- the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

You have the right to request information about whether your personal data is transmitted to a non-EU country or an international organization. In this context, you may request to be informed of the appropriate guarantees pursuant to Art. 46 GDPR in connection with the transmission.

2. Right to rectification

You have a right of rectification and/or completion vis-à-vis the data controller if the personal data processed concerning you are incorrect or incomplete. The controller shall make the correction without undue delay.

3. Right to restriction of processing

Under the following conditions, you may request that the processing of your personal data be restricted:

- if you dispute the accuracy of the personal data concerning you for a period of time that enables the data controller to verify the accuracy of the personal data;
- the processing is unlawful and you refuse to delete the personal data and instead request that the use of the personal data be restricted;
- the controller no longer needs the personal data for the purposes of the processing, but you do need them to assert, exercise or defend legal claims, or
- if you have objected to processing pursuant to Article 21(1) GDPR pending the verification whether the legitimate grounds of the controller override those of the data subject.

If the processing of your personal data has been limited, this data – aside from its storage – may only be processed with your consent or in order to assert, exercise or defend legal claims or to



protect the rights of another natural or legal person, or for the sake of an important public interest of the Union or a member state.

If the processing restriction has been imposed according to the aforementioned conditions, you will be informed by the data controller before the restriction is lifted.

4. Right to deletion

a) Obligation to delete data

You may request the data controller to delete the personal data relating to you without delay and the controller is obligated to delete this data without delay if one of the following reasons applies:

- The personal data concerning you are no longer necessary for the purposes for which they were collected or otherwise processed.
- You revoke your consent, on which the processing was based pursuant to Art. 6 para. 1 lit. a or Art. 9 para. 2 lit. a GDPR, and there is no other legal basis for the processing.
- You file an objection against the processing pursuant to Art. 21 para. 1 GDPR and there are no overriding legitimate reasons for the processing, or you file an objection against the processing pursuant to Art. 21 para. 2 GDPR.
- The personal data concerning you have been processed unlawfully.
- Your personal data must be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.
- Your personal data have been collected in relation to the offer of information society services referred to in Article 8(1) of the GDPR.

b) Information to third parties

If the data controller has made the personal data concerning you public and is obliged to delete it pursuant to Art. 17 para. 1 GDPR, he shall take appropriate measures, including technical measures, taking into account the available technology and the implementation costs, to inform data processors who process the personal data that you as the data subject have requested the deletion of all links to this personal data or of copies or replications of the personal data.

c) Exemptions

The right to deletion does not exist insofar as the processing is necessary

- for exercising freedom of expression and information;



- for compliance with a legal obligation which requires processing under a law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- for reasons of public interest in the field of public health pursuant to Art. 9 para. 2 lit. h and i and Art. 9 para. 3 GDPR;
- for archiving purposes in the public interest, scientific or historical research purposes or for statistical purposes pursuant to Art. 89 para. 1 GDPR, insofar as the law referred to under a) is likely to render impossible or seriously impair the attainment of the objectives of such processing, or
- to assert, exercise or defend legal claims.

5. Right to information

If you have exercised your right to have the data controller correct, delete or limit the processing, he/she is obliged to inform all recipients to whom the personal data concerning you have been disclosed of this correction or deletion of the data or restriction on processing, unless this proves impossible or involves a disproportionate effort.

The controller is entitled to be informed of such recipients.

6. Right to data transferability

You have the right to receive your personal data that you have provided to the controller in a structured, common and machine-readable format. In addition, you have the right to pass this data on to another controller without hindrance by the controller to whom the personal data was provided, as long as

- the processing is based on a declaration of consent pursuant to Art. 6 para. 1 lit. a GDPR or Art. 9 para. 2 lit. a GDPR or on a contract pursuant to Art. 6 para. 1 lit. b GDPR and
- processing is carried out using automated methods.

In exercising this right, you also have the right to request that your personal data be transferred directly from one data controller to another, insofar as this is technically feasible. This should not impair other people's freedoms or rights.

The right to transferability shall not apply to the processing of personal data necessary for the performance of a task in the public interest or in the exercise of official authority vested in the controller.

7. Right to object



You have the right to object, on grounds relating to your particular situation, at any time to processing of your personal data which is based on point (e) or (f) of Article 6(1), including profiling based on those provisions.

The data controller no longer processes the personal data concerning you, unless he or she can prove compelling reasons worthy of protection for the processing, which override your interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims.

If your personal data is being processed for the purpose of direct marketing, you have the right to object at any time to the processing of your personal data for the purpose of such advertising; this also applies to profiling where this is connected to such direct marketing.

If you object to the processing for direct marketing purposes, your personal data will no longer be processed for these purposes.

You have the possibility to exercise your right of objection in connection with the use of Information Society services by means of automated procedures using technical specifications, notwithstanding Directive 2002/58/EC.

8. Right to revoke the data protection declaration of consent

You have the right to revoke your data protection declaration of consent at any time. Revoking your consent will not affect the legality of any processing that took place before the revocation.

9. Automated decision in individual cases including profiling

Although KinnsAi does utilize automation to process personal data, you are advised that you have the right not to be subject to a decision based exclusively on automated processing – including profiling – that has legal effect against you or significantly impairs you in a similar manner. This does not apply if the decision

- is necessary for the conclusion or performance of a contract between you and the controller,
- is admissible by law of the Union or of the Member States to which the controller is subject and that law contains appropriate measures to safeguard your rights, freedoms and legitimate interests, or
- with your express consent.

However, these decisions may not be based on special categories of personal data pursuant to Art. 9 para. 1 GDPR, unless Art. 9 para. 2 lit. a or g applies, and appropriate measures have been taken to protect your rights and freedoms and your legitimate interests.



In the cases referred to in (1) and (3), the controller shall take reasonable measures to safeguard your rights, freedoms and legitimate interests, including at least the right to obtain the intervention of a person by the controller, to state his or her point of view and to challenge the decision.

10. Right to lodge a complaint with a supervisory authority

Without prejudice to any other administrative or judicial remedy, you have the right of appeal to a supervisory authority, in particular in the country where you reside, work or suspect of infringement, if you believe that the processing of your personal data is contrary to the GDPR.

The supervisory authority to which the complaint has been lodged shall inform the complainant of the status and results of the complaint, including the possibility of a judicial remedy under Article 78 GDPR.

X. Conclusion:

We sincerely hope this helps outline your rights and our obligations vis-a-vis your privacy and that you will trust KinnsAi to ensure the proper handling of any personal information you provide to us.