

Updated: Sep 10, 2021

PRIVACY POLICY

Introduction

Grom R&D Limited, registered address 27 Old Gloucester Street, London, United Kingdom, WC1N 3AX, company number 12444209 (the "Company", "Grom", "Honee", "we", "us" or "our") respects your right to privacy and is committed to protecting your personal data.

This Privacy Policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from), how we collect and process the personal information we receive from your use of this website, including any data you may provide through this website when you access and use the Honee in order to ensure that we can meet your needs when providing our services.

This Privacy Policy is outlined below. Please also use the *Definitions* section to understand the meaning of some of the terms used in this Privacy Policy.

By accessing and using our website, you signify acceptance of the terms of this Privacy Policy. Where we require your consent to process your personal information, we will ask for your consent to the collection, use, and disclosure of your personal information as described further below.

If you do not agree with or you are not comfortable with any aspect of this Privacy Policy, you should immediately discontinue access or use of our website.

This website is not intended for children (under 18 years old) and we do not knowingly collect data relating to children. Please notify us if you know of any individuals under the age of 18 using our Services so we can take action to prevent access to our Services.

It is important that you read this Privacy Policy together with any other Privacy Policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements the other notices and is not intended to override them.

We reserve the right to modify this Privacy Policy at any time by posting the amended version on this site including the effective date of the amended version.

Controller

We are the data controller and responsible for the collection, use, disclosure, retention and protection of your personal data in accordance with this Privacy Policy, as well as any applicable national laws.

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

Our Contact details

Grom R&D Limited,

Lytchett House, 13 Freeland Park, Wareham Road, Poole, Dorset, BH16 6FA

hello@grom.org

You have the right to make a complaint at any time to the supervisory authority for data protection. However, we would appreciate the chance to deal with your concerns before you approach the authorities, so please contact us in the first instance.

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

The data we collect about you

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).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.

Contact Data includes address, email address and telephone numbers.

Financial Data includes payment card details, wallet address.

Transaction Data includes details about payments to and from you.

Technical Data includes 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.

Usage Data includes information about how you use our website.

Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

WE DO NOT COLLECT AND STORE YOUR SEED PHRASE OR USER PASSWORDS.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

How is your personal data collected?

We obtain information about you in a number of ways through your use of our services, including through:

Our website, the account opening process, event subscribing, news and updates subscribing, and from information provided in the course of on-going support service communications.

Third parties. We also receive information about you from third parties such as your payment providers and through publicly available sources.

Automated technologies and interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.

Information about our use of cookies

We use 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. By continuing to browse our website, you are agreeing to our use of cookies.

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, make payments and make use of e-billing services.

- Analytical/performance cookies. They allow us to recognize 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 recognize you when you return to our website. This enables us to personalize 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.

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.

Direct interactions. You may give us your Identity, Contact and Financial Data as part of our KYC ("know your customer") requirements, if it will be necessary to comply with the law.

Data Protection Principles

We will ensure that the personal information we hold about you is:

- used lawfully, fairly and in a transparent way;
- collected only for specified and legitimate purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- adequate, relevant and limited to what is necessary in relation to the purposes we have told you about;
- accurate and kept up to date;
- not kept in a form which permits your identification for longer than necessary;
- kept securely and not transferred to another country without appropriate safeguards being in place;

- and kept only as long as necessary for the purposes we have told you about.

How we use your personal data

We will only use your personal data in accordance with *GDPR*. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party who really need to in order to perform their tasks and duties, and who have a legitimate purpose for accessing it) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us (see *Contact Us*).

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Opting out

You can ask us to stop sending you marketing messages at any time by contacting us at any time.

Change of purpose

We will only use your personal data for the purposes for which we collected.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Disclosures of your personal data

We may have to share your personal data with the parties set out below:

- liaising with regulators;
- liaising with third party service providers (which may be providing other services to you);
- liaising with any individual person and/or entity to which we have outsourced certain functions;
- liaising with our legal advisors in respect of the services being provided to you by us;
- third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them.

If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

International transfers

We do ordinarily not transfer your personal data outside the European Economic Area (the “**EEA**”).

In circumstances where we do need to transfer any data outside of the EEA we will strive to ensure that the individual or entity receiving the personal data provides an adequate level of protection for that personal data.

Please *contact us* if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

Unfortunately, we cannot ensure or warrant the security or confidentiality of information you transmit to us or receive from us by Internet or wireless connection, including email, phone, or SMS, since we have no way of protecting that information once it leaves and until it reaches us. If you have reason to believe that your data is no longer secure, please contact us.

Data retention

How long will you use my personal data for?

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.

In most cases we will aim to keep records of personal data for a minimum of 5 years after the expiry of our contract.

Your legal rights

You have certain rights in relation to your personal data as summarised here:

- **Right to be informed** – you have the right to be provided with clear, transparent and easily understandable information about how we use your personal data and your rights; this is why we are providing you with the information in this Privacy Policy;
- **Right to withdraw consent** – where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time;
- **Right of access** – you can request access to your personal data. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it;
- **Correcting information** – where we hold information about you that is inaccurate or incomplete, you have the right to ask us to rectify or complete it;
- **Right to be erased** - This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your

information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request. Also, we should note that we are not able to erase, modify, or alter personal data which was recorded on a public blockchain because blockchains are decentralized or third-party networks which are not controlled or operated by us;

- **Right to restrict processing** – in certain circumstances you have the right to restrict some processing of your personal information, which means that you can ask us to limit what we do with it. For example, you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it;
- **Right to object to processing** – you can object to us processing your personal information in certain circumstances, including where we are using it for the purpose of the Company's legitimate business interests;
- **Right to data portability** – you have the right to obtain from us and re-use your personal data for your own purposes. This only applies, however, where the processing is carried out by automated means, to personal data that you have provided to us yourself (not any other information) and where the processing is based on your consent or for the performance of a contract;
- **Right to complain** - you are able to submit a complaint to the Regulator about any matter concerning your personal information, using the details below. However, we take our obligations seriously, so if you have any questions or concerns, we would encourage you to raise them with us first, so that we can try to resolve them.

Your rights to personal information are not absolute. Access may be denied when:

- Denial of access is required or authorized by law;
- Granting access would have a negative impact on other's privacy;
- Granting access would have a negative impact on other's privacy;
- To protect our rights and properties;
- Where the request is frivolous or vexatious.

Subject Access Requests

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may refuse to comply with your request in circumstances where your request is clearly unfounded, repetitive or excessive.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed 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.

Time limit to respond

We try to respond to all legitimate requests as soon as reasonably practicable and, in any event, within 30 days of receipt of the request.

Definitions

data is information which is stored electronically, on a computer, or in certain paper-based filing systems.

data subjects for the purpose of this policy include all living individuals about whom we hold personal data. A data subject need not be a UK national or resident. All data subjects have legal rights in relation to their personal information.

personal data means data relating to a living individual who can be identified from that data (or from that data and other information in our possession). Personal data can be factual (for example, a name, address or date of birth) or it can be an opinion about that person, their actions and behaviour.

data controllers are the people who or organisations which determine the purposes for which, and the manner in which, any personal data is processed.

data users are those of our employees whose work involves processing personal data. Data users must protect the data they handle in accordance with this data protection policy and any applicable data security procedures at all times.

data processors include any person or organisation that is not a data user that processes personal data on our behalf and on our instructions. Employees of data controllers are excluded from this definition but it could include suppliers which handle personal data on our behalf.

processing is any activity that involves use of the data. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transferring personal data to third parties.

sensitive personal data and/or special categories of personal data includes information about a person's racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health or condition or sexual life, or about the commission of, or proceedings for, any offence committed or alleged to have been committed by that person, the disposal of such proceedings or the sentence of any court in such proceedings. Sensitive personal data can only be processed under strict conditions, including a condition requiring the express permission of the person concerned.