

Privacy and Cookies Policy - Flout

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1. INTRODUCTION.

- a. At 21 Holdings Limited (Hereinafter referred to as “Flout” “we” “our platform” “our website/site” and/or “us”), we are dedicated to the privacy of our website and platform visitors and users. We are committed to protecting and safeguarding your personal data. This privacy and cookies policy gives you an insight into how we collect and use your data to maximize your experience on our Platform. It shows how we collect, use, protect the information collected and your rights regarding your privacy. It also contains important information on who we are and how we use cookies on our website.
- b. This policy describes how flout.com (the “site” “website” and/or “we”) collects, uses, and discloses your personal information when you visit or make a purchase from the site.
- c. The first time you visit our website, you will be informed about our use of cookies to improve your site experience. Consenting to our use of cookies in accordance with the terms of this policy when you first visit our website permits us to use cookies every time you visit our website.
- d. By using this website or any of our services, you consent to the use of the cookies detailed herein and your personal data in the manner contained in this policy, to the extent permitted by law. Please read this policy carefully and note that the English version of this policy is binding, all other translations are only for convenience purposes.
- e. Please note that if you are in the European Economic Area, United Kingdom, Switzerland or any other country that the EU General Data Protection Regulation 2016/679 (“GDPR”) and Data Protection Act of 2018 (DPA), you will not be required to consent to this policy, however, by using Flout, you acknowledge that you have read and understood its terms. The provisions of 13 of this policy apply to you specifically.
- f. Please note that if you live in California, the California Consumer Privacy Act applies to you. The provisions of Section 14 of this policy applies to you specifically.
- g. This policy should be read and used together with our Terms of Use.

2. ABOUT FLOUT

We are a company registered in the United Kingdom but operating our services and offering our products globally. We are based in Richmond, United Kingdom. Regarding any issue related and connected to your privacy on our platform, we can be contacted at contact@flout.com . We have a dedicated team who would endeavour to respond to your email timeously.

3. HOW WE COLLECT YOUR INFORMATION.

To maximize your experience on our website, we collect information in the following ways:

- a. When you provide them to us either by access, use or purchasing our services, registering for our platform (including but not limited to when you connect your profile on a third-party platform with your registration details), request certain information from us, join or participate in any of our promotional services, use our review, ratings or scoring feature, interact with any of our social media platforms, access any third party links on our platform or interact with us either online or offline in any manner whatsoever.
- b. We also passively collect information when you use our service. This collection of information can be from information in your browser or device.
- c. As you interact with any of our platforms, we may automatically collect Technical information about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive technical information about you if you visit other websites or when you visit our sites, or use our sites on third-party sites or platforms using one or more devices that employ our cookies whether or not you are logged in or registered. To disable cookies, please refer to our cookies policy below.
- d. In line with our cookies policy, Flout may use cookies to track user traffic patterns in order to create user’s personalized/targeted services, offers, promotions, adverts, products, and capture trends, in accordance with our services. For safety and security purposes, service improvement, and data collection, we may use software that receives and records the Internet Protocol (IP) addresses of the computer’s users used to interact/contact our platform. We do not attempt

to link these addresses with the identity of individuals visiting our platform.

- e. We also use social media tools or third-party applications to collect information, especially when you join our platform or use our services through these third party or social media platforms. To prevent us from sharing your information with these third-party platforms, please do not access our services through them. It is also advisable that you read the privacy policy of these third-party platforms to understand how your privacy is ensured by them.

4. INFORMATION WE COLLECT.

Through the mediums stated in Section 3, either from those provided to us by you, through third parties or through passive and automated means, we collect the following information from you. ***Transaction information***

- a. Examples of this information are
 - i. **Registration Information:** When you create an account with us, link your profile through a third-party platform. We collect your contact or log-in details which include but are not limited to name, email address, zip/postcode, phone number or any other information you choose to share with us.
 - ii. **Transaction Information:** This is collected when you contact us about a transaction on the platform. The information that will be collected includes but is not limited to banking information, contact information such as your phone number, email address, mailing address, billing address, card number or payment details or any other information you provide to us. Our payment processors (Stripe, Paypal, etc) also collect and retain information related to your transaction. Please note that in many cases, Flout cannot view or access all of the information you provide to us for compliance purposes, such as complete bank account numbers or payment information, as this may be transmitted in an automated manner directly to the party that requires that compliance information. Transaction information is not always needed to register on our Platform, they are only collected when a purchase is made, or a financial transaction is initiated.
 - iii. **Compliance Information:** Information provided needed for compliance purposes as required for our services as needed or required by law.
- b. **Purpose of collection:** to provide products or services to you to fulfill our contract, to process your payment information, give you authorization to our tools and services, and provide you with invoices and/or transaction confirmations, communicate with you, screen our transactions for potential risk or fraud, and when in line with the preferences you have shared with us, provide you with information or advertising relating to our products or services.
- c. **Source of collection:** collected from you.
- d. **Disclosure for a business purpose.**

Device Information

- a. Examples of this information are
 - i. Information about your visits to and use of our platform including the referral source, length of visit, page views, and website navigation paths.
 - ii. **Location Information:** This is information about your location provided by a mobile or other device interacting with our platforms, or associated with your IP address, where we are permitted by law to process this information.
 - iii. Usage, viewing, technical, and device data when you visit our sites, or use our sites on third-party sites or platforms, or open emails we send, including your browser or device type, unique device identifier, and IP address. We collect some of this information by using “cookies” or other similar technologies directly from your device.
- b. **Purpose of collection:** to load the site accurately for you, and to perform analytics on site usage to optimize our site.
- c. **Source of collection:** Collected automatically when you access our site using cookies, log files, web beacons, tags, or pixels.
- d. **Disclosure for a business purpose:** shared with our processor Shopify.

Other Information

- a. Examples of this information are
 - i. Information, such as your name and email address, that you enter in order to set up subscriptions to our emails, promotional and campaign updates and/or newsletters.
 - ii. Information that you post to our website with the intention of publishing it on the internet, which includes your username, and the content of your posts, such as reviews.
 - iii. **Customer Service Information** - Information contained in any communications that you send to us by email or through our website, including its communication content and metadata.
 - iv. Activity information about your use, and the use by any person(s) you authorize through your account, of our sites, such as the content you view or post, how often you use our services, and your preferences.
- b. **Purpose of collection:** to perform our services to you
- c. **Source of collection:** collected from you.

In a more detailed categorization and for simplification purposes, please note that the information we collect from you is categorized as follows: (a) identifiers (name, email address, IP address, location information, profile photographs); (b)

commercial information (transaction data); (c) financial and transaction information (transaction details, payment details etc); (d) Internet and device information (browsing history; IP address, cookies, device details, browser information) (e) inference information about you; (f) sensory information (if you call us, send an email or leave a voicemail); (g) usage Information (such as information about how you use our website(s), products, and services); (h) marketing and communications information (This is linked to your preferences in receiving marketing from us and third parties and your communication preferences); and (i) other information that identifies or can be reasonably linked to you. 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). If you provide this information in our public forums such as reviews, we might not be able to protect such information. Please know that we will in no circumstance ask for this special category of personal data information. You are not required to provide personal data to us. It is within your right to decline any request to provide information to us. However, your failure to do so may affect our ability to provide the services you request. It might also limit the use of our platform to its full potential. If you have an account with us, you may also review, change or remove certain types of your information provided to us by accessing your account section of the website.

5. HOW WE USE THE INFORMATION COLLECTED FROM YOU.

In line with regulatory provisions, applicable laws, your preferences as set on our platform or third-party platforms, we use information collected from you or related devices in the following manner or any other manner as stated on the relevant pages of our platform:

- a. Administering, improving or promoting our services and ensuring that we maximize the potentials of our platform for your use.
- b. Personalizing the use of our platform as selected and set by you.
- c. For processing purchases, transactions, understanding your interests and doing all that is needed and important to carry out our services to you.
- d. Internal use by our staff and contractors to ensure the maximization of your use of our platforms.
- e. Analysing data usage trends and preferences in order to improve the accuracy, effectiveness, security, usability or popularity of our Services.
- f. Communicating with you regarding a) marketing communications relating to our business or the businesses of carefully-selected third parties which we think may be of interest to you (you can inform us at any time if you no longer require marketing communications either by clicking unsubscribe at the bottom of the email or contacting us in other ways provided); b) your account or transactions on our platform; (c) send you Know Your Customer (KYC) information or request feedback about features on our platform; (d) notify you of changes to our policies; and (e) sending you non-marketing commercial communications such as dealing with inquiries and complaints made by or about you relating to our platform or any other communication to us from you.
- g. Technical activities, such as bug detection and error reporting, etc.
- h. Providing third parties with statistical information about our users (but those third parties will not be able to identify any individual user from that information);
- i. Verifying compliance with the Terms of Use governing the use of our website; and
- j. Security, Fraud, and Legal Compliance, including to detect, investigate and prevent activities that may violate our policies or be illegal.
- k. If you are located in the European Economic Area, United Kingdom or Switzerland, we process information as listed in this policy as necessary (i) to fulfil our obligations under our contract with you or in order to take steps at your request prior to entering into a contract, or (ii) for our legitimate interest, such as to maintain our relationship with you or to protect you when you use our platform.
- l. Your information will only be used for the purposes for which it was collected, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to obtain an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. We will notify you if we need to use your information for unrelated purposes and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6. DISCLOSURE OF INFORMATION COLLECTED FROM YOU.

Except as provided in this policy, we will not provide your personal information to third parties. The way in which we may disclose information collected from you are:

- a. For compliance purposes like payment processing or identity verification.
- b. For legal purposes which includes but are not limited to; complying with the requirements of the law such as subpoenas, search warrants, court orders, and other legal processes; responding to enquiries or requests from government, regulatory, law enforcement, public authorities, or content protection organizations; defending the legal rights, privacy, safety or property of Flout, its subsidiaries, employees, agents, contractors or users; permitting Flout to pursue available remedies,

commence, participate in or defend litigation, or limit the damages we may sustain; and to enforce this policy or any applicable Terms of Use are complied with.

- c. We may also disclose to Third-party platforms needed to perform our services to you. This includes but is not limited to payment services providers e.g., Stripe or any payment platform selected by you as provided on our platform. We use stripe as our official payment processor. You can read more about how Stripe uses your personal information here: <https://stripe.com/privacy>
- d. To maximize our service to you, we might disclose to our partners and service providers which includes but are not limited to banks and payment providers, third-party identity checking or credit reference agencies, communication providers, marketing agencies, analytics tools, Information Technology, information security and cloud services providers, delivery personals.
- e. We may share your information internally for the performance of our services to you.
- f. We may transfer any information we have about you as an asset in connection with a proposed or completed merger or sale (including transfers made as part of insolvency or bankruptcy proceedings) involving all or part of Flout or as part of a corporate reorganization or other change in corporate control.
- g. We may share your information with your consent, such as when you post personal information on platforms accessible to third parties, or you share your profile activities with third-party platforms.
- h. Please note that once we share your personal information with another company, the information received by the other company is controlled by that company and becomes subject to the other company's privacy practices.

7. SECURITY OF YOUR PERSONAL INFORMATION.

- a. We will take reasonable technical and organizational precautions to prevent the loss, misuse, or alteration of your personal information.
- b. We will store all the personal information you provide on secure cloud servers who are GDPR compliant.
- c. You acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet, however, we undertake to take all reasonable steps to ensure the safety of your data.,
- d. You are responsible for keeping the password you use for accessing our website confidential; we will not ask you for your password (except when you log in to our website).

8. YOUR RIGHTS AND CONTROLS ON YOUR INFORMATION.

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These rights are:

- a. **The right to request access to your personal data (commonly known as a “data subject access request”):** enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- b. **The right to request correction of such personal data that we hold about you:** this enables you to have any incomplete or inaccurate data we hold about you corrected. However, we may need to verify the accuracy of the new information you provide to us.
- c. **Request erasure of your personal data:** this enables you to ask us to delete or remove personal data where there is no good reason for us to continue 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.
- d. **The right to object to the processing of your personal data, 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 as you feel it impacts on your fundamental rights and freedoms:** You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- e. **The right to request the restriction of processing of your personal data:** this enables 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.
- f. **The right to request the transfer of your personal data to you or to a third party:** we will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Please note that this right only applies to automated information that you initially provided consent for us to use or where we used the information to perform a contract with you.
- g. **The right to withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your

consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

- h. **The right to opt-out** - You can opt-out of receiving our marketing communications. However, you will still receive transactional messages from us. To opt-out of receiving our marketing communications, you can contact us at contact@flout.com.

In ensuring that we address your requests:

- a. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in such circumstances.
- b. 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.
- c. We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex, requires additional efforts or you have made several requests. In this case, we will notify you and keep you updated.
- d. For the purpose of this section 8, legitimate interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

9. TARGET AND BEHAVIOURAL ADVERTISEMENT

1.
 - a. We use Google Analytics to help us understand how our customers use the site. You can read more about how Google uses your Personal Information here: <https://policies.google.com/privacy?hl=en>. You can also opt-out of Google Analytics here: <https://tools.google.com/dlpage/gaoptout>.
 - b. We may share information about your use of our website, your purchases, and your interaction with our ads on other websites with our advertising partners. We collect and share some of this information directly with our advertising partners, and in some cases through the use of cookies or other similar technologies (which you may consent to, depending on your location)
 - c. For more information about how targeted advertising works, you can visit the Network Advertising Initiative's ("NAI") educational page at <http://www.networkadvertising.org/understanding-online-advertising/how-does-it-work>.
 - d. You can opt out of targeted advertising by:
 - i. **FACEBOOK** - <https://www.facebook.com/settings/?tab=ads>
 - ii. **GOOGLE** - <https://www.google.com/settings/ads/anonymous>
 - iii. **BING** - <https://advertise.bingads.microsoft.com/en-us/resources/policies/personalized-ads>
 - e. Additionally, you can opt out of some of these services by visiting the Digital Advertising Alliance's opt-out portal at: <http://optout.aboutads.info/>.

10. AMENDMENTS

We may update this policy from time to time by publishing a new version on our website. You should check this page occasionally to ensure you understand any changes to this policy. We may notify you of changes to this policy by email or through email or any other choice of communications as set by you.

11. CHILD PRIVACY.

While our Services are mostly aimed at corporate bodies, it is important to note that our Website and services are not designed for use by individuals under the age of 18. If you are not up to the age of 18, do not use the services and/or submit any information through the services. If you have reason to believe that a child under the age of 16 has provided personal information to Flout through the services, please contact us at contact@flout.com, and we will delete that information from our servers to the extent required by law.

12. HOW LONG DO WE KEEP YOUR INFORMATION?

We keep your personal data in an identifiable form for as long as we have a legitimate reason to use the data and as required by law.

13. GENERAL DATA PROTECTION REGULATION ("GDPR") PROVISIONS.

In addition to the clauses contained in this policy, if you are a user in European Economic Area, United Kingdom, and/or Switzerland, as directed by the GDPR, the following provisions apply to you. However, if you have doubts on whether the provisions in this (13) apply to you, please contact a legal practitioner for advice.

- a. Flout is a data controller under the provisions of the GDPR, and we are responsible for how your information is collected, used and disclosed. Please note that - the information collected by us is controlled by the Terms of Use, and this policy, and our cookies policy below
- b. Also be informed that if you provide information to us through any third-party platform, that third-party platform may also collect your information separately. The information collected by any third parties is subject to the third-party's privacy policy. Please note that the Privacy choices you have made on the third party's platform will not apply to our use of the information we have collected directly through our platforms.
- c. Also be informed that our platform may contain links to third party websites. We are not responsible for the privacy practices of those sites. It is our advice to you that you please pay attention to the privacy policy of these third-party platforms.
- d. We only collect information to the extent needed and germane for the performance of our contract to you, provide services on our platform and perform all the rights, obligations, responsibilities and terms contained in our Terms of Use.
- e. We also collect information for our legitimate interest (which do not override your fundamental rights and freedoms), on the basis of consent, to improve the quality of service provided to you, to respond to your questions, to provide marketing information to you, for legal reasons, to make and receive payment for the security of our platform, to enforce our Term and Conditions, to engage in business change, to comply with a legal or regulatory obligation and to create anonymous data.
- f. For the purpose of (e), legitimate interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.
- g. For the purpose of (e), compliance with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.
- h. Users in the European Economic Area, United Kingdom, and/or Switzerland have the right to opt-out of all of our processing of their data for direct marketing purposes, to do this you click "unsubscribe" at the bottom of a marketing email or edit your preferences in your account setting.
- i. Users in the European Economic Area, United Kingdom, and/or Switzerland also have the rights contained in 8 (a-g). In addition, they may also object to our uses or disclosures of personal data, request a restriction on its processing, or withdraw any consent, though such actions typically will not have a retroactive effect. They also will not affect our ability to continue processing data in lawful ways (for example, if you opt-out of the use of your telephone number for direct marketing, we might still decide to contact you by phone regarding potential fraud on your account).
- j. Users in the European Economic Area, United Kingdom, and/or Switzerland also have the right to lodge a complaint with the local data protection authority if you believe that we have not complied with applicable data protection laws. You also have the right to lodge a complaint with the supervisory authority of your residence, place of work or where the incident took place. However, please endeavour to contact us first at contact@flout.com .
- k. We will only keep and retain the collected information as needed and pertinent for the collected data and as permitted by law. As soon as we no longer need to keep the data, we will remove it from our platforms and systems. We will also take the needed steps to anonymize the collected information.
- l. When we no longer need to use your information, we will remove it from our systems and records and/or take steps to anonymize it and take other steps to protect them. We regularly review our security procedures to consider appropriate protection methods. However, please be aware that despite our best efforts, no security measures are perfect or impenetrable.
- m. When determining the retention period, we take into account various criteria, such as the type of products and services requested by you or that you are provided with by us, the nature and length of our relationship with you, possible re-enrolment with our services, the impact on our platform if we delete the information about you, mandatory retention periods provided by law and the statute of limitations.
- n. For any transfer, wherever your personal data is transferred, stored or processed by us, we will take steps to safeguard the privacy of your personal information. For any information on your privacy, any question and these regulations, you can reach us at contact@flout.com .

14. CALIFORNIA CONSUMER PRIVACY ACT.

If you live in California, you may have the following rights over your information:

- a. For the period covering the 12 months preceding your request, you may request that we disclose to you the categories

and specific pieces of information collected about you, the categories of sources from which we collected that information, and the purposes for which your information was collected. The categories of third parties with whom we share that information. The specific pieces of information we collected about you (**a data portability request**). If we disclosed your information for a business purpose, two separate lists disclosing:

- i. sales, identifying the information categories that each category of recipient purchased; and
 - ii. disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.
- b. You may also request that we delete the information we collected from you.
 - c. You have the right not to be discriminated against for exercising your rights over your information.
 - d. You may submit a request to exercise your rights by sending us an email at contact@flout.com . We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex, requires additional efforts or you have made several requests. In this case, we will notify you and keep you updated.
 - e. We will not discriminate against you for exercising any of your rights as guaranteed by the California Consumer Privacy Act.

15. CONTACTING US AND OUR DATA PROTECTION OFFICER.

Please do not hesitate to contact us if you have any questions regarding Flout’s policies. You can contact our data protection officer, Oliver Coleshill at contact@flout.com or at our registered address, Parkshot House, 5 Kew Road, Richmond, TW9 2PR.

16. HOW TO COMPLAIN

Please contact us if you have any queries or concerns about our use of your information (see section 15). We hope we will be able to resolve any issues you may have. You also have the right to lodge a complaint with:

- the Information Commissioner, in the UK, and
- a relevant data protection supervisory authority in the state of your habitual residence, place of work.

The UK’s Information Commissioner may be contacted at <https://ico.org.uk/make-a-complaint> or by telephone: 0303 123 1113.

COOKIES POLICY

17. WHAT COOKIES ARE AND HOW WE USE THEM?

- a. A cookie is a small amount of information that’s downloaded to your computer or device when you visit our site. We use a number of different cookies, including functional, performance, advertising, and social media or content cookies. Cookies make your browsing experience better by allowing the website to remember your actions and preferences (such as login and region selection). This means you don’t have to re-enter this information each time you return to the site or browse from one page to another. Cookies also provide information on how people use the website, for instance whether it’s their first time visiting or if they are a frequent visitor.

18. OUR COOKIES CATEGORIES AND WHAT THEY DO

We use the following cookies to optimize your experience on our site and to provide our services.

- a. **Analytical** – We use analytical/performance cookies to help us understand how users engage with our Platform. An example is counting the number of visitors and seeing how many visitors move around our Platform when they are using it. This helps us to improve the way our Platform works, for example, ensuring that users, such as yourself, find what you are looking for easily.
- b. **Performance** – These cookies are necessary to enable the basic features of this site to function, some of these features include but are not limited to providing secure log-in. These cookies are required for the operation of our Platform.
- c. **Functional** – These cookies allow us to analyse your use of Flout when you return to our website, this helps us to evaluate and improve our system performance. We use cookies to improve your experience by remembering your preferences, so we know how you like to use our website. Examples of this would be remembering you so that you are served with the same content or to remember you when you come back to the Platform.

Cookies Necessary for the Functioning and Performance of our Platform

| Name | Function |
|----------------------|-------------------------------------------|
| <i>intercom-id-*</i> | Identifies user for our live chat feature |
| <i>connect.sid</i> | User identifier for login purposes |

- a. **Advertising and Marketing** – To ensure that the adverts and marketing campaigns that you see are relevant to you we use cookies to collect information about the types of things that interest you, for example, websites you visit and the geography that you are based in. Having these cookies does not increase the number of adverts you will be shown, but simply makes the adverts you see more relevant to your internet activities.
- b. **Targeting activities**– Targeting 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.
- c. **Third-Party Cookies** - We use the following third-party services for analytics, advertising and marketing. We suggest that you take a look at the privacy and data policies of these platforms to help you know how they use your data. These platforms include but are not limited to Alexa.com; Google Analytics; Google AdSense. Specifically, we work with analytics providers such as Google Analytics, which use cookies and similar technologies to collect and analyze information about use of the Services and report on activities and trends. Google Analytics may also collect information regarding the use of other websites, apps and online resources. Please see google policies, or you can opt out by downloading Google’s opt out addon - **the Google Analytics opt-out browser add-on**.

19. MANAGING YOUR COOKIES PREFERENCES

- a. The length of time that a cookie remains on your computer or mobile device depends on whether it is a “persistent” or “session” cookie. Session cookies last until you stop browsing and persistent cookies last until they expire or are deleted. Most of the cookies we use are persistent and will expire between 30 minutes and two years from the date they are downloaded to your device.
- b. You can always manage your cookies and tracking. You can do this through the settings in your browser. You can set your browser to inform you on accepting or rejecting cookies on a website you visit. If you use different devices in different locations to access our Platform, you should make sure that these devices are set to your preferences before accessing our Platform.
- c. If you have previously consented to us storing cookies on your machine but then change your mind, you can delete the cookies from your browser or device. Most browsers also allow you to prevent all or some cookies being stored on your machine in the future. For adequate and accurate information on how to delete or disable cookies from your browser, please use the “help” function within your browser. For more information on how to modify your browser settings or how to block, manage or filter cookies can be found in your browser’s help file or through such sites as www.allaboutcookies.org.
- d. For more information you can use also use the following link

| | |
|----------------------------------|------------------------------------------------------------------------|
| Device | Managing Cookies |
| Chrome (Web and Mobile Devices) | Click Here |
| Safari (Web and Mobile Devices) | Click here |
| Firefox (Web and Mobile Devices) | Click Here |
| Internet Explorer | Click Here |
| Other Devices and Browsers | Please contact the help session of your device or contact the provider |

- a. If you only want to reject some or all of the third-party cookies, you will need to visit the relevant third party’s website directly to manage cookies stored on your machine by them.
- b. Please be informed that disabling cookies may affect the functionality and accessibility of some pages on our Platform.
- c. We can’t always control third party cookies stored on your machine from our website, setting your cookie preferences with us will not stop those third-party cookies from being stored on your machine. You must manage these cookies directly with the relevant third party. We suggest that you take a look at the privacy and data policies of these third parties to help you know how they use your data.
- d. Additionally, please note that blocking cookies may not completely prevent how we share information with third parties such as our advertising partners. To exercise your rights or opt-out of certain uses of your information by these parties, please follow the instructions in the “Behavioural Advertising” section (section 9) above.
- e. For further information about cookies, please visit the guidance on cookies published by the UK Information Commissioner’s Office at <https://ico.org.uk/your-data-matters/online/cookies/>

20. DO NOT TRACK

Please note that because there is no consistent industry understanding of how to respond to “Do Not Track” signals, we do not alter our data collection and usage practices when we detect such a signal from your browser.

21. CHANGES AND AMENDMENTS

22. We may update this policy from time to time by publishing a new version on our website. You should check this page occasionally to ensure you understand any changes to this policy. We may notify you of changes to this policy by email or any other choice of communications as set by you.

23. CONTACTING US AND OUR DATA PROTECTION OFFICER.

Please do not hesitate to contact us if you have any questions regarding Flout's policies. You can contact our data protection officer, Oliver Coleshill at contact@flout.com or at our registered address, Parkshot House, 5 Kew Road, Richmond, TW9 2PR.

24. HOW TO COMPLAIN

Please contact us if you have any queries or concerns about our use of your information (see section 23). We hope we will be able to resolve any issues you may have. You also have the right to lodge a complaint with:

- the Information Commissioner, in the UK, and
- a relevant data protection supervisory authority in the state of your habitual residence, place of work.

The UK's Information Commissioner may be contacted at <https://ico.org.uk/make-a-complaint> or by telephone: 0303 123 1113.