

## PAINTNGO LTD PRIVACY POLICY

### 1. WHO WE ARE

PaintnGo Ltd ("we", "our," "us") are the **Data Controller** of your personal information. This means we are responsible for deciding how we hold and use your personal data.

| Detail            | Information                                                             |
|-------------------|-------------------------------------------------------------------------|
| Company No.       | 16525133                                                                |
| Registered Office | 3 Mount Ephraim Court, Molyneux Park Road, Tunbridge Wells Kent TN4 8DH |

We are committed to protecting your privacy in compliance with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**.

**Children's Privacy:** This website is not intended for children under 13, and we do not knowingly collect data relating to children.

### 2. CONTACTING US ABOUT YOUR DATA

We have appointed a **Data Protection Manager** who is responsible for overseeing questions in relation to this privacy policy.

| Contact Method  | Details                                                                                                                                                                                                                     |
|-----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Email:          | david@paintngo.com                                                                                                                                                                                                          |
| Post:           | David Chapple, PaintnGo Ltd 3 Mount Ephraim Court, Molyneux Park Road, Tunbridge Wells Kent TN4 8DH                                                                                                                         |
| ICO Complaints: | You have the right to lodge a complaint with the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ( <a href="http://www.ico.org.uk/concerns">www.ico.org.uk/concerns</a> ). |

### 3. THE DATA WE COLLECT ABOUT YOU

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

| Data Category    | Description (Examples)                                                                                                             |
|------------------|------------------------------------------------------------------------------------------------------------------------------------|
| Identity Data    | First name, last name, username or similar identifier, date of birth, and gender.                                                  |
| Contact Data     | Email address, phone number, postal address, and billing address.                                                                  |
| Financial Data   | Payment card data is solely managed by our payment provider, Stripe, and <b>no payment card information is stored by PaintnGo.</b> |
| Transaction Data | Details about payments to and from you, and details of products and services you have purchased from us.                           |
| Technical Data   | Internet protocol (IP) address, login data, browser type and version, time zone setting, location, operating system, and platform. |
| Profile Data     | Purchases or orders made by you, your interests, preferences, feedback, and survey responses.                                      |
| Usage Data       | Information about how you use our website, products, and services.                                                                 |
| Marketing Data   | Your preferences in receiving marketing from us and our third parties, and your communication preferences.                         |
| Media Data       | <b>Photos, video footage, and images of your artwork taken during events for promotional purposes.</b>                             |

|                                |                                                                                                                                                                |
|--------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Incident &amp; Log Data</b> | Information relating to customer refusal of alcohol service, customer ejection, or licensing incidents (including time, date, refusal reason, and staff name). |
|--------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|

We also collect, use, and share Aggregated Data (like statistical or demographic data). This data is anonymised and therefore no longer considered personal data under UK GDPR.

#### 4. HOW WE COLLECT YOUR PERSONAL DATA

We use different methods to collect data from and about you, including:

- **Direct Interactions:** You give us your Identity, Contact, Financial, Profile, Marketing, and **Media Data** when you fill in forms, make bookings, **sign a media release form**, enter competitions, apply for a job, or correspond with us by post, phone, or email.
- **Automated Technologies/Interactions:** As you interact with our website, we automatically collect Technical and Usage Data via cookies and other similar technologies. Please refer to our Cookie Policy for more details.
- **Third Parties or Public Sources:** We receive Transaction and Payment Confirmation from providers of technical, payment, and delivery services, such as our third-party booking provider, Stripe, to fulfil the service.

#### 5. HOW AND WHY, WE USE YOUR PERSONAL DATA

The UK GDPR requires us to have a valid legal basis to process your personal data. We rely on the following bases for the specific purposes listed:

| Processing Purpose                                                                                                | Data Categories Used                         | Lawful Basis for Processing                                                                                                  |
|-------------------------------------------------------------------------------------------------------------------|----------------------------------------------|------------------------------------------------------------------------------------------------------------------------------|
| To register you as a new customer and manage your account.                                                        | Identity, Contact, Profile                   | Performance of a Contract (to provide services to you).                                                                      |
| To process and deliver your booking or order and manage payments.                                                 | Identity, Contact, Financial, Transaction    | Performance of a Contract (to fulfil your order/booking). Legal Obligation (for tax and accounting).                         |
| To manage our relationship with you, including notifying you about changes to our terms or privacy policy.        | Identity, Contact, Profile                   | Legal Obligation (to inform you of legal/policy changes). Legitimate Interests (to keep our records updated).                |
| To administer and protect our business (including troubleshooting, data analysis, testing, and fraud prevention). | Identity, Contact, Technical, Usage          | Legitimate Interests (for running our business, network security, and preventing fraud).                                     |
| To deliver relevant content and advertisements to you and measure the effectiveness of the advertising.           | Identity, Contact, Profile, Usage, Marketing | Legitimate Interests (to study how customers use our products/services, to develop them, and inform our marketing strategy). |
| To use your image, likeness, or artwork in marketing and promotional materials.                                   | Media Data, Identity                         | Consent (explicit consent required via media release form).                                                                  |
| To maintain the mandatory Refusal/Incident Log and comply with the UK Licensing Act 2003.                         | Incident & Log Data                          | Legal Obligation (to comply with UK licensing requirements and the police/local authority)                                   |

|                                                                   |                              |                                                                                                                                                                                      |
|-------------------------------------------------------------------|------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>To send you direct marketing about new services or offers.</b> | Identity, Contact, Marketing | Consent (where required). Legitimate Interests (for direct marketing to existing customers who have previously purchased similar goods/services and subject to your opt-out rights). |
|-------------------------------------------------------------------|------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

**Legitimate Interests Explained** Where we rely on Legitimate Interests (UK GDPR Article 6(1)(f)), we ensure our interests are not overridden by your rights and freedoms. Our legitimate interests include:

- **Business Improvement:** Analysing customer data (Usage and Profile Data) to improve our website, products, and services.
- **Security & Fraud Prevention:** Using Technical Data (e.g., IP addresses) to protect our IT network, prevent crime, and ensure secure payments.
- **Record Keeping:** Maintaining records (e.g., Transaction Data) to comply with professional and regulatory standards.

## 6. MARKETING COMMUNICATIONS

We will only send you marketing communications where we have a valid lawful basis to do so, primarily your **Consent**.

- **Opt-In Required:** When collecting your personal data for marketing purposes, we will provide a clear opt-in option.
- **Right to Withdraw Consent/Opt-Out:** You may unsubscribe from our marketing emails at any time by clicking the unsubscribe link found at the bottom of every email. This right to object to direct marketing is absolute.

## 7. DISCLOSURE OF YOUR PERSONAL DATA

We may share your personal data with the following categories of trusted third parties:

- **Internal Third Parties:** Other business partners that provide services like shared IT, finance, and business development.
- **External Third Parties (Processors):**
  - **Booking Providers:** Such as Stripe, which processes your Contact, Financial, and Transaction Data to manage your reservations.
  - **Payment Processors:** To securely manage payment card information.
  - **IT and Systems Providers:** To support our website, data storage, and email systems.
  - **Marketing Agencies and Email Broadcasters:** To manage and distribute our marketing communications.
  - **Regulators/Enforcement:** The Police or Local Authority Licensing Teams where required by law (e.g., presenting the Refusal/Incident Log).
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- **Business Reorganisations:** Third parties to whom we may choose to sell, transfer, or merge parts of our business or assets.

We only allow third parties to process your data for specified purposes and in accordance with our instructions and UK GDPR compliance.

## 8. DATA SECURITY AND RETENTION

**Data Security** We have implemented suitable physical, electronic, and managerial procedures to safeguard and secure your personal data from accidental loss, unauthorised access, alteration, or

disclosure. We also limit access to your personal data to employees, agents, and contractors with a strict business need to know.

**Data Retention Periods** We will only keep your personal data for as long as is reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, or accounting requirements.

| Data Category                                                 | Retention Period/Criteria                                                                                                                                                     |
|---------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Financial/Transaction Data (e.g., Gift Cards/Bookings)</b> | 7 years after the last purchase/booking date to meet UK legal and tax obligations.                                                                                            |
| <b>Media Data (Photos/Videos/Artwork Images)</b>              | Retained as long as we have active, documented Consent to use the image for marketing. Deletion will be processed upon withdrawal of consent.                                 |
| <b>Incident &amp; Log Data</b>                                | Retained for the period required by the Premises Licence condition (typically 12 months) plus 6 months for administrative purposes.                                           |
| <b>Marketing Data</b>                                         | As long as we have your active consent. If you opt-out/withdraw consent, we will retain your Contact Data only on a suppression list to ensure we do not market to you again. |
| <b>Wi-Fi Usage Data</b>                                       | 1 year of inactivity.                                                                                                                                                         |
| <b>Job Applicant Data</b>                                     | As long as necessary to process your application and related statistics, which will be made clear to you at the time of application.                                          |
| <b>Other Data:</b>                                            | We apply a general criteria to retain data only for as long as needed to manage our ongoing customer relationship and defend potential legal claims.                          |

In some circumstances, we will anonymise your personal data (so it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice.

## 9. YOUR UK GDPR RIGHTS

Under the UK GDPR, you have the following rights in respect of your personal data:

| Your Right                                      | Description                                                                                                                                                                                                    | Response Time                                                                                    |
|-------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
| <b>Right of Access</b>                          | The right to request a copy of the personal data we hold about you (a Subject Access Request).                                                                                                                 | Within one month (28 days) of receipt of the request.                                            |
| <b>Right to Rectification</b>                   | The right to have any inaccurate or incomplete personal data corrected.                                                                                                                                        | Within one calendar month of receipt of the request.                                             |
| <b>Right to Erasure (Right to be Forgotten)</b> | The right to ask us to delete or remove personal data where there is no valid reason for us to continue processing it (e.g., you withdraw consent).                                                            | Within one month (28 days) of receipt of the request.                                            |
| <b>Right to Restrict Processing</b>             | The right to ask us to suspend the processing of your personal data in certain scenarios (e.g., if you are disputing its accuracy).                                                                            | Within one month (28 days) of receipt of the request.                                            |
| <b>Right to Object to Processing</b>            | An absolute right to object to processing for direct marketing. You can also object where we are relying on Legitimate Interests (and we must cease unless we have compelling legitimate grounds to continue). | Actioned as soon as possible for direct marketing. Within one month (28 days) for other grounds. |

|                                  |                                                                                                                                                                                                                                                                       |                                                       |
|----------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------|
| <b>Right to Data Portability</b> | The right to move, copy, or transfer your personal data (provided to us by you) to another service provider in a structured, commonly used, machine-readable format.                                                                                                  | Within one month (28 days) of receipt of the request. |
| <b>Automated Decision-Making</b> | The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal or similarly significant effects. We do not currently use solely automated decision-making processes that would produce such effects on you. | N/A                                                   |

**Fee:** You will not have to pay a fee to exercise any of your rights. However, we may charge a reasonable fee or refuse to comply if your request is clearly unfounded, repetitive, or excessive. To exercise any of these rights, please contact the Data Protection Manager using the contact details in Section 2.

## 10. COOKIES AND THIRD-PARTY LINKS

- **Cookies:** A cookie is a small piece of information sent by a web server to a web browser. For more information about the cookies, we use and how to change your cookie preferences, please see our separate **Cookie Policy**.
- **Third-Party Websites:** Our website contains links to other websites (e.g., our booking provider). We do not control these third-party sites and are not responsible for their privacy policies. When you leave our site, please read the privacy policy of the new site you visit.

## 11. CHANGES TO THIS PRIVACY POLICY

We may change this policy from time to time by updating this page. We encourage you to check this page periodically to ensure you are happy with any changes.

**Effective Date:** 18 October 2025 **Last Updated:** 29 January 2025