

Welcome to the MIFU LTD's privacy policy.

MIFU LTD respects your privacy and is committed to protecting your personal data. This privacy policy will inform you of how we collect, use and protect your personal data when you visit our website (regardless of where you visit it from), and tell you about your privacy rights under UK law.

Purpose of this privacy policy

This privacy policy is designed to give you information on how MIFU LTD collects and processes your personal data through your use of this website, including any data you may provide through this website when you interact with any Mifu Ltd website, app, email or other.

This website is not intended for children, and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any notices or privacy policies which 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 other notices and policies and is not intended to override them.

Controller

MIFU LTD is the controller and responsible for your personal data (collectively referred to as ["COMPANY"], "we", "us" or "our" in this privacy policy).

We have appointed a data protection officer (DPO) 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 *team@mifu.co.uk*.

You have the right to make a complaint to the Information Commissioner's Office (ICO), the UK regulator for data protection issues, at any time. We would appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your 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, last name, username or similar identifier, date of birth and gender, interests, social media presences].

Contact Data includes [billing address, delivery address, email address and telephone numbers].

Financial Data includes bank account and payment card details.

Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.

Social Data includes any data you have made publicly available through any social media platform. Including, but not limited to, username, biography, profile picture, metadata, posts, captions.

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.

Profile Data includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.

Usage Data includes information about how you use our website, products and services.

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

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

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.

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?

Through this Privacy Policy, we satisfy our responsibilities under GDPR Articles 13 and 14 to inform data subjects about how their data is processed. NOTE: There may be instances where we cannot individually notify each data subject (notably Influencers) of this, especially when we collect data from third-party sources like social networks.

As per Recital 62 and Article 14(5)(b) of the GDPR, we are permitted to do so when notifying each Influencer would be impractical or require undue effort, especially in the context of statistical processing.

However, we are committed to taking suitable steps to safeguard the rights, freedoms, and legitimate interests of data subjects.

Note: This is not legal advice, and it's always best to consult with a legal advisor for personalized guidance. We use different methods to collect data from and about you including through:

1. Direct interactions. You may give us your Identity, Contact, Financial and Social Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

apply for our products or services;

create an account on our website;

subscribe to our service or publications;

request marketing to be sent to you;

enter a competition, promotion or survey; or

give us feedback or contact us.

2. Automated technologies or interactions. As you interact with our website, we will automatically collect Technical Data 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 Data about you if you visit other websites employing our cookies.

3. Third parties or publicly available sources. We will receive personal data about you from various third parties and public sources as set out below:

Social and Technical Data from the following parties:

- (i) analytics providers such as Google based outside the UK
 - (ii) advertising networks
 - (iii) search information providers
 - (iv) social media networks such as Meta and TikTok
4. **Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as Stripe.**
 5. **Identity and contact data from data brokers or aggregators.**
 6. **Identity and contact data from publicly available sources such as social media networks.**

How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

1. **We will perform the contract we are about to enter into or have entered into with you.**
2. **Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not conflict with each other.**
3. **Where we need to comply with a legal obligation.**

We generally do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you. You have the right to withdraw consent at any time by contacting us.

4. **To provide you with opportunities in your interest.**

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Brands

| Personal Data | Legal basis for processing (art. 14(1)(C) GDPR) | Purposes for processing (Art. 14(1)(c) GDPR): Reason for collection |
|----------------------|--|---|
| Full name | Performing our contract with you (Art. 6(1)(b) GDPR). | We require your name for our contractual relationship. |
| Email | (1) Performing our contract with you (Art. 6(1)(b) GDPR). 1. Our legitimate interests related to marketing (Art. 6(1)(f) and Recital 47 GDPR) | 1) We require your email to log you into the system and to provide you with the Service, reports, Service related updates, communications and other important information. 2) If We do use your email to contact you for marketing purposes, it will be in Our legitimate interests to do so, but you will always have a chance to opt out of such marketing communications for similar products and/or services prior to first (and any subsequent) communication. You may opt out at any time by emailing team@mifu.co.uk |

Influencers

We only handle data that you've publicly posted on social media platforms such as Instagram, YouTube, TikTok, and Twitch. We manage your personal information in strict compliance with applicable laws, particularly adhering to the principles of "lawfulness, fairness,

transparency" as outlined in Article 5(1)(a) of the GDPR, and we respect your rights, as detailed in the subsequent section.

| Personal Data | Legal basis for processing (art. 14(1)(C) GDPR) | Purposes for processing (Art. 14(1)(c) GDPR): Reason for collection |
|--|---|---|
| <ol style="list-style-type: none"> 1. A link to the Influencer's profile, username, complete name, profile picture, spoken language, bio, geographic location (country, city, state), shared interests with brands, engaged followers of note, and sponsored content. 2. Email and social media profile. 3. Images, graphics, photos, profiles, audio and video clips, sounds, musical works, works of authorship, applications, links and other content or materials from your social network profile. | <p>Influencers publish their information on social media platforms, making it publicly accessible. We manage anonymized data gathered from these public sources (Instagram, YouTube, TikTok, Twitch).</p> <p>We have a justified reason to utilize the information provided by Influencers on social platforms for the purpose of direct marketing, in line with Recital 47 of the GDPR, without compromising the Influencers' basic rights and freedoms.</p> | <p>To enable Clients to select an appropriate Influencer for their business objectives and evaluate the reach effectiveness of each Influencer.</p> |

Automatic Processing

| Personal Data collected by us automatically | Legal basis for processing (art. 14(1)(C) GDPR) |
|--|--|
| 1. Internet Protocol (IP) | Performance of the contract (Art. 6(1)(b) GDPR). |
| 2. Device cookies | <p>Contract performance for the "strictly necessary" cookies. Legitimate interest for the first-party analytics cookies (Art. 6(1)(f) GDPR).</p> <p>Your consent prior to the placement of all the other types of cookies (Art. 6(1)(a) GDPR).</p> |

Audience Statistics and Data

We examine a large volume of data to furnish Clients with relevant statistics. Specifically, we analyze the Influencer audience's gender, age group, and ethnicity. While these categories

could be viewed as sensitive, we've conducted an assessment as outlined in Article 35(7)(a) of the GDPR to confirm our legitimate interests and to ensure they don't infringe upon the basic rights and freedoms of the Audience or any individuals (Article 6(1)(f) GDPR). We've determined that our statistical processing complies with the applicable laws and doesn't violate individual rights.

To lawfully handle data concerning the Audience's ethnicity, we rely on appropriate legal grounds. One such basis is statistical processing (Article 9(2)(j) GDPR), which safeguards the fundamental rights and interests of the Audience. Additionally, this data is publicly shared by the data subjects themselves (Article 9(2)(e) GDPR). This data handling neither discriminates against nor adversely affects any individuals. Furthermore, there is no automated decision-making or profiling based on the ethnicity of the Audience (Article 14(2)(g) GDPR).

Our legitimate interest to work with personal data are direct marketing purposes as said in Recital 47 GDPR (EU GDPR), and Statistical purposes referring to Recitals 113 and 162 GDPR.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established a privacy centre where you can view and make certain decisions about your personal data use.

Promotional offers from us

We will use your Identity, Contact, Technical and Usage Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us, or purchased goods or services from us, and you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

INFLUENCERS

We inform Influencers about the processing of their personal data via our website and this Policy. Due to the large volume of data processed, we lack the technical capacity to notify each Influencer individually. As per our Terms of Service and Contracts with Customers, the responsibility to inform Influencers about their data processing lies with the Customer.

We offer a statistics-based service; thus, the Influencer data outlined above is made available to Customers either on a trial basis or upon payment.

The Influencer data we manage falls into two categories:

- **Raw Data:** This includes all information sourced from public/open profiles on social platforms like Instagram, YouTube, TikTok, and Twitch. Raw data is unstructured, making it impossible to identify Influencers based solely on this information. Processed Data is derived from Raw Data, which is then used to generate Reports.
- **Processed Data:** This is structured data created from Raw Data and is categorized into two groups.

CUSTOMERS

We don't sell, share, or disclose your data except as outlined in this policy. We handle your personal data in a manner that aligns with your expectations, provided you've given informed, clear consent for any unexpected usage. We utilize customer contact details and payment information to establish and maintain business relations as required for delivering our Services. If a customer doesn't supply the necessary personal data, we may not be able to complete the transaction. We only reach out to customers for service-related matters. For marketing communications, customers can opt out at any time before the first or any subsequent contact.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you, logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences, or contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our cookie policy.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we can demonstrate that we need to use it for another purpose and that purpose is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

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

In compliance with the above rules, we may process your personal data without your knowledge or consent where this is required or permitted by law.

Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table [Purposes for which we will use your personal data] above, as permitted by law.

5. Third Parties:

Google Analytics

Apify

Amazon Web Services (AWS)

- 6. Third parties with 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, the new owners will 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 comply with our data protection principles. We do not allow our third-party service providers to use your personal data for their own purposes or process it for any other purpose than those specified in this agreement, and only permit them to do so subject to our instructions.

International transfers

We do not transfer your personal data outside the UK.

If we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented [DELETE AS APPLICABLE]:

- (a) We will only transfer your personal data to countries that provide an adequate level of protection for personal data. For further details, see [].
- (b) Where we use certain service providers, we will use specific contracts approved for use in the UK which give personal data the same protection it has in the UK. For further details, see [].

Data security

We have put in place appropriate security measures to protect your personal data from accidental loss, unauthorized use or access, alteration or disclosure. We also 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.

Data retention

How long will you use my personal data for?

We will retain your personal data for the period necessary to fulfil the purposes we collected it for, including for the purpose of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting or other requirements.

By law, we must keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for compliance purposes.

You have the right to ask us to delete your data in certain circumstances.

In some circumstances we may anonymise your personal data (so that 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 to you.

Your legal rights

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

- (A) Request access to your personal data.
- (B) Request correction of your personal data.
- (C) Request erasure of your personal data.
- (D) Object to processing of your personal data.
- (E) Request restriction of processing your personal data.
- (F) Request transfer of your personal data.
- (G) Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us at team@mifu.co.uk

No fee usually required

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 could refuse to comply with your request in these circumstances.

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. We may also contact you to ask for further information in relation to your request. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

Time limit to respond

We will endeavour to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly

complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Glossary

LAWFUL BASIS

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.

The performance of this contract means processing your data where it is necessary for the performance of a contract to which you are a party or taking steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

THIRD PARTIES

Internal Third Parties

Other companies in the MIFU LTD Group [acting as joint controllers or processors] and who are based [SPECIFIC COUNTRIES] and provide [IT and system administration services and undertake leadership reporting].

External Third Parties

- (a) Service providers who provide IT and system administration services]based in specific countries.

- (b) Professional advisers who are processors or joint controllers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- (c) HM Revenue & Customs, regulators, and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you, and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

I would like my personal data to be erased. This will allow you to ask us to delete or remove your 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 erase your personal data in order 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.

Object to 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.

Request 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:

If you want us to establish the data's accuracy.

Where our use of the data is unlawful but you do not want us to erase it.

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.

You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

We would like to request the transfer of your personal data to you or to a third party. We will provide you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

You have the right to withdraw your consent at any time where we are relying on your 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.