

Kinshare Ltd Privacy Notice

Last updated (v1.0): 8th July 2025

About this notice

Kinshare takes the value and sensitivity of all personal information seriously and will always collect and manage it in the best interests of our customers. This privacy notice tells you what to expect from us in regard to the collection and processing of your personal information, how to contact us, and how to complain if you have any concerns.

“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).

It is important that you read this privacy notice alongside any other privacy notice 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.

1. Contact details

Kinshare Ltd is registered in the UK with Companies House as a private company, limited by shares, as Company Number: 15740435. Our registered address is:

128 CITY ROAD
LONDON
UNITED KINGDOM EC1V 2NX

For the purposes of any applicable data protection laws in England and Wales, including the Data Protection Act 2018 (DPA) the UK General Data Protection Regulation (UK GDPR) and General Data Protection Regulation EU 2016/679 (EU GDPR), Kinshare is the data controller of your personal data. Kinshare has appointed a Data Protection Officer, who can be contacted via:

Email: team@kinshare.co.uk

2. What information we collect, use, and why

2.1. We collect or use the following information to provide services and goods, including delivery (i.e. as part of new user registration to access our services or products):

- Names and contact details
- Account information
- Location data
- Website user information (including user journeys and cookie tracking)
- Information relating to compliments or complaints

2.2. We collect or use the following information for the operation and management of customer accounts and guarantees (including system troubleshooting, support, or security investigations):

- Names and contact details
- Marketing preferences
- Account Information
- Website and app user journey information
- Information relating to compliments or complaints

2.3. We collect or use the following information for service updates or marketing purposes:

- Names and contact details
- Marketing preferences
- Location data
- Website and app user journey information
- Information relating to compliments or complaints

2.4. We collect or use the following information for research or archiving purposes (including asking you to leave reviews or partake in surveys):

- Names and contact details
- Location data
- Website and app user journey information
- Personal information used for administration of research
- Personal information used for the purpose of research
- Records of consent, where appropriate

2.5. We collect or use the following personal information for dealing with queries, complaints or claims:

- Names and contact details
- Account information
- Purchase or service history
- Correspondence
- Information relating to compliments or complaints

3. Lawful bases and data protection rights

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible [lawful bases](#) in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO’s website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we

get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. [Read more about the right of access](#).

- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. [Read more about the right to rectification](#).
- **Your right to erasure** - You have the right to ask us to delete your personal information. [Read more about the right to erasure](#).
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. [Read more about the right to restriction of processing](#).
- **Your right to object to processing** - You have the right to object to the processing of your personal data. [Read more about the right to object to processing](#).
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. [Read more about the right to data portability](#).
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. [Read more about the right to withdraw consent](#).

3.1. Our lawful bases for the collection and use of your data

For more information on any of our uses of legitimate interests as a lawful basis, you can contact us using the contact details set out above.

3.1.1. Our lawful bases for collecting or using personal information **to provide services and goods are:**

- **Consent** - we have permission from you after we gave you all the **relevant information**. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- **Legitimate interests** – we’re collecting or using your information **because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone**. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - Kinshare collects this information in order **to develop new products or services, or to monitor the effectiveness of existing products or services you have subscribed to**.

3.1.2. Our lawful bases for collecting or using personal information **for the operation of customer accounts and guarantees are:**

- **Consent - we have permission from you after we gave you all the relevant information.** All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

3.1.3. Our lawful bases for collecting or using personal information for service updates or marketing purposes are:

- **Consent - we have permission from you after we gave you all the relevant information.** All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- **Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone.** All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - Kinshare collects this information to develop new service offerings, or **to develop partnerships with other entities, which may benefit the user.**

3.1.4. Our lawful bases for collecting or using personal information for research or archiving purposes are:

- **Consent - we have permission from you after we gave you all the relevant information.** All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- **Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone.** All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - Kinshare collects this information **to identify users willing to engage in the development or testing of new products or services, such as providing feedback on software prototypes, partner offers, or new service concepts.**

3.1.5. Our lawful bases for collecting or using personal information for dealing with queries, complaints or claims are:

- **Consent - we have permission from you after we gave you all the relevant information.** All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

4. Where we get personal information from

- Directly from you
- Publicly available sources
- Market research organisations
- Providers of marketing lists and other personal information

5. How long we keep information

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 some circumstances we may retain your personal data for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to your relationship with us. Where your personal data is no longer required, we will ensure it is either securely deleted or stored in a way that no longer identifies you. 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.

6. Who we share information with

Others we share personal information with may include:

- Professional or legal advisors
- Financial or fraud investigation authorities
- Professional consultants
- Organisations we're legally obliged to share personal information with

7. How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you make a request, we must respond to you without undue delay and in any event within one month.

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 may 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 (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.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the UK ICO:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>