



PRIVACY POLICY AND USE OF COOKIES

FL&M LTD as owners of PickaShift are committed to protecting and respecting your privacy in accordance with Data Protection Law.¹This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us as well as outlining the cookies that we will use when you access the PickaShift application (the **App**), website (the **Site**), and services.

Please read the following carefully to understand our practices regarding your personal data. You consent to the terms of the Privacy Policy by clicking "ACCEPT". If you do not agree to these terms, click on the "REJECT" button instead.

SCOPE OF POLICY

This policy covers your use of the PickaShift App, Site and services. It advises you of what to expect from us in terms of the privacy and control of your data, regardless of the medium or device you use to connect with PickaShift. FL&M Ltd facilitates your use of PickaShift and in this capacity, it may come to remotely access, read, display, alter, maintain and analyse your data.

INFORMATION WE COLLECT FROM YOU

We will collect and process the following information:

- **Information you give us directly:** We receive this when you register your interest on the website, or when you get in touch, when you subscribe for services, or when you report a glitch or maintenance issue to us. If you contact us, we will keep a record of it because we treat all your communications with us as important. The types of information you may give us could include your name, address, e-mail address and phone number, age, username, password and other registration information, financial and credit card information, personal description and photograph.
- **Information we collect about you from your interactions with PickaShift:** Each time you visit one of the Site or use the App we will automatically collect information about your visit. This could include technical or locational information or personal identifiers such as your membership number or IP address for example.
- **3rd Party Information** - It is possible that our partners will hold information about you which we need to collect, adapt or use for our own purposes. This may be information from Site developers, payment and delivery services, advertising networks, analytics providers, credit

¹Data Protection Law for the avoidance of doubt shall mean (a) any legislation in force from time to time in the United Kingdom which implements the European Community's Directive 95/46/EC and Directive 2002/58/EC, including but not limited to the Data Protection Act 1998 and the Privacy and Electronic Communications (EC Directive) Regulations 2003; (b) with effect from 25 May 2018, the Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the "General Data Protection Regulation" or GDPR); and (c) any statutory codes of practice issued by the UK Information Commissioner (or its equivalent in other territories) in relation to such legislation.



reference agencies or from other care professionals or care facilities. The purposes for which we intend to use that information will be for contractual reasons, or to improve the service to you, or to improve the business from the perspective of stakeholders or shareholders.

COOKIES

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

We use cookies to distinguish you from other users of the App, or the Site, or our services. This helps us to provide you with a good experience when you use the App or browse any of the sites and also allows us to improve the App and the Site.

You can find more information about the individual cookies we use and the purposes for which we use them by emailing us at support@pickashiftapp.com

Any third-party cookies (from advertisers for example) will be governed by their own terms and privacy policies, so you should read these before giving your consent to enable these third-party cookies.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of Our Sites.

WHERE WE STORE YOUR INFORMATION

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (EEA). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. These staff may be engaged in the fulfilment of your request, order or reservation, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to the potential transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely, is subject to the data minimisation principle (that no more data is processed than is necessary to achieve our stated purposes), and in accordance with this Privacy Policy.

All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a username or password that enables you to access the App, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted via the App or a Site. Any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.



We may collect and store personal data on your Device using application data caches and browser web storage (including HTML 5) and other technology.

USES MADE OF YOUR INFORMATION

We use information held about you for the purposes of system administration to improve our App and Services, to enable us and the Customer to fulfil each other's legal and contractual duties to each other and third parties, and to maintain high quality access and usage. We may associate the device you use to connect with us to the data sets we glean from your activity on the Site or the App. We will treat the combined information as personal data in accordance with this Privacy Policy. We may also use the details you have provided from time to time to contact you in relation to the App or the Services we provide, unless you have opted out of being contacted for such purposes.

DISCLOSURE OF YOUR INFORMATION

We may disclose your personal information to third parties:

- In the event that FL&M Ltd sells or buys any business or assets, in which case we may disclose your personal data to the prospective seller or buyer (such as an investor) of such business or assets.
- If FL&M Ltd or substantially all of its assets are acquired by a third-party, in which case personal data held by it about PickaShift users or partners, will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation or request.
- In order to enforce or apply our separate terms of service with you, and any other relevant agreements or to investigate potential breaches or protect the rights, property or safety of FL&M Ltd, our partners, clients, end-users or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

ACCESS TO INFORMATION

Data Protection Law gives you the right to access information held about you which you can exercise by either writing to us, or emailing support@pickashiftapp.com under the heading "Data Subject Access Request" specifying the information you would like us to disclose. We will endeavour to provide you with details of the information we hold about you.

CHANGES TO PRIVACY POLICY

Any changes we may make to this Privacy Policy in the future will be posted on our Site or the App without further recourse or notice to you. The new terms may be displayed on-screen and you may be required to read and accept them to continue your use of the Site, the App or the services.

CONTACT

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to FL&M Ltd. We are located at 9 Shinn Road, Newry, Co. Down, Northern Ireland, BT34 1PF or you can email support@pickashiftapp.com