

Privacy Policy

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain personal data about you. When we do so we are subject to the UK General Data Protection Regulation (UK GDPR).

Key terms

It would be helpful to start by explaining some key terms used in this policy:

We, us, our	Skyrad Consulting Limited, a company registered in England with company number 09391369, whose registered office is at 50 Petley Road, Hammersmith, London, England, W6 9ST, trading as Pippa
Personal data	Any information relating to an identified or identifiable individual
Special category personal data	Personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership Genetic and biometric data (when processed to uniquely identify an individual) Data concerning health, sex life or sexual orientation
Data subject	The individual who the personal data relates to

Personal data we collect about you

We may collect and use the following personal data about you:

- your name and contact information, including email address and telephone number
- location data through the Pippa app: this is a required permission in order to use Bluetooth. The app does not collect or transmit and any location information about your phone.
- your billing information, transaction and payment card information
- your contact history, purchase history and saved items
- Information about how you use our website, app, IT, communication and other systems
- your responses to surveys, competitions and promotions

- Data collected from your Pippa, including: Cooking usage, hours of cooking, frequency of cooking, type of cooking, number and types of hazards detected, response to hazards
- Feedback you provide about our goods and services

We collect and use this personal data to provide products and services to you. If you do not provide personal data we ask for, it may delay or prevent us from providing products or services to you.

How your personal data is collected

We collect some of this personal data directly from you—in person, by telephone, text or email and/or via our website and app. However, we may also collect information:

- From your Pippa device (Cooking usage, hours of cooking, frequency of cooking, type of cooking, number and types of hazards detected, response to hazards)
- from cookies on our website

How and why we use your personal data

Under data protection law, we can only use your personal data if we have a proper reason, eg:

- where you have given consent;
- to comply with our legal and regulatory obligations;
- for the performance of a contract with you or to take steps at your request before entering into a contract; or
- for our legitimate interests or those of a third party.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own.

The table below explains what we use your personal data for and why.

What we use your personal data for	Our reasons
Providing products and/or services to you	To perform our contract with you or to take steps at your request before entering into a contract
Ensuring business policies are adhered to, eg policies covering security and internet use	For our legitimate interests, ie to make sure we are following our own internal procedures so we can deliver the best service to you
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests, ie to be as efficient as we can so we can deliver the best service to you
Statistical analysis to help us manage our business, eg in relation to our financial performance, customer base, product range or	For our legitimate interests, ie to be as efficient as we can so we can deliver the best service to

What we use your personal data for	Our reasons
other efficiency measures	you
Updating and enhancing customer records	To perform our contract with you or to take steps at your request before entering into a contract To comply with our legal and regulatory obligations For our legitimate interests, eg making sure that we can keep in touch with our customers about our service
Ensuring safe working practices, staff administration and assessments	To comply with our legal and regulatory obligations For our legitimate interests, eg to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you
Contacting you to ask for feedback on our products and services	For our legitimate interests, ie to update and improve our products and services so we can deliver the best service to you
Marketing our services to: —existing and former customers; —third parties who have previously expressed an interest in our services.	For our legitimate interests, ie to promote our business to existing and former customers

Where we process special category personal data, we will also ensure we are permitted to do so under data protection laws, eg:

- we have your explicit consent;
- the processing is necessary to protect your (or someone else's) vital interests where you are physically or legally incapable of giving consent; or
- the processing is necessary to establish, exercise or defend legal claims.

Marketing

We may use your personal data to contact you to offer you the chance to extend your Pippa contract beyond the terms of your trial.

We may use your personal data to send you updates (by email, text message, telephone or post) about our products and services, including exclusive offers, promotions or new products or services.

We have a legitimate interest in using your personal data for marketing purposes (see above '**How and why we use your personal data**'). This means we do not usually need your consent to send you marketing information. However, where consent is needed, we will ask for this separately and clearly.

You have the right to opt out of receiving marketing communications at any time by:

- contacting us at help@mypippa.me;
- using the 'unsubscribe' link in emails or 'STOP' number in texts.

We may ask you to confirm or update your marketing preferences if you ask us to provide further products or services in the future, or if there are changes in the law, regulation, or the structure of our business.

We will always treat your personal data with the utmost respect and never share it with other organisations for marketing purposes.

Who we share your personal data with

We routinely share personal data with:

- third parties we use to help deliver our products and services to you, eg payment service providers, warehouses and delivery companies;
- other third parties we use to help us run our business, eg marketing agencies or website hosts;
- third parties approved by you, eg social media sites you choose to link your account to or third party payment providers;
- our banks;
- If you have obtained your Pippa through one of our affinity partners e.g. your home insurer, we may share data with them, including data relating to your cooking usage, hours of cooking, frequency of cooking, type of cooking, number and types of hazards detected, response to hazards.

We only allow our service providers to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. We also impose contractual obligations on service providers to ensure they can only use your personal data to provide services to us and to you.

We may also need to:

- share personal data with external auditors, eg in relation to the audit of our accounts;
- disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations;
- share some personal data with other parties, such as potential buyers of some or all of our business or during a restructuring—usually, information will be anonymised but this may not always be possible, however, the recipient of the information will be bound by confidentiality obligations.

If you would like more information about who we share our data with and why, please contact us (see 'How to contact us' below).

We will not share your personal data with any other third party.

Where your personal data is held

Personal data may be held at our offices and those of our third party agencies, service providers, representatives and agents as described above (see above: 'Who we share your personal data with').

How long your personal data will be kept

We will keep your personal data while you have an account with us or we are providing products and/or services to you. Thereafter, we will keep your personal data for as long as is necessary:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you fairly;
- to keep records required by law.

We will not keep your personal data for longer than necessary. Different retention periods apply for different types of personal data.

When it is no longer necessary to keep your personal data, we will delete or anonymise it.

Your rights

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal data
Rectification	The right to require us to correct any mistakes in your personal data
Erasure (also known as the right to be forgotten)	The right to require us to delete your personal data—in certain situations
Restriction of processing	The right to require us to restrict processing of your personal data in certain circumstances, eg if you contest the accuracy of the data
Data portability	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object	The right to object: —at any time to your personal data being processed for direct marketing (including

	profiling); —in certain other situations to our continued processing of your personal data, eg processing carried out for the purpose of our legitimate interests.
Not to be subject to automated individual decision making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on each of those rights, including the circumstances in which they apply, please contact us (see ‘**How to contact us**’ below) or see the [Guidance from the UK Information Commissioner’s Office \(ICO\) on individuals’ rights](#).

If you would like to exercise any of those rights, please:

- email, call or write to us—see below: ‘**How to contact us**’; and
- provide enough information to identify yourself (*eg your full name and address*) and any additional identity information we may reasonably request from you;
- let us know what right you want to exercise and the information to which your request relates.

Keeping your personal data secure

We have appropriate security measures to prevent personal data from being accidentally lost, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Children’s Privacy

We do not knowingly collect Personal Data from children under 13. In the case we discover that a child under 13 has provided us with personal information, we immediately delete this from our servers. If you are a parent or guardian and you are aware that your child has provided us with personal information, please contact us so that we will be able to complete the necessary actions.

How to complain

Please contact us if you have any query or concern about our use of your information (see below ‘**How to contact us**’). 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. The Information Commissioner may be contacted at <https://ico.org.uk/make-a-complaint> or telephone: 0303 123 1113.

Changes to this privacy policy

This privacy notice was published on 22/05/2021 and last updated on 22/05/2021.

We may change this privacy notice from time to time—when we do we will inform you via our website or other means of contact such as email.

How to contact us

Individuals in the UK

You can contact us by post, email if you have any questions about this privacy policy or the information we hold about you, to exercise a right under data protection law or to make a complaint.

Our contact details are shown below:

Our contact details
Skyrad Consulting Ltd, 50 Petley Road, Hammersmith, London, England, W6 9ST
help@mypippa.me