

## Sure Petcare App Privacy Policy

Please read this Privacy Policy before using the Sure Petcare mobile application (“**App**”) operated by SureFlap Limited doing business as “**Sure Petcare**” (“**us**”, “**we**”, “**our**” or “**Company**”).

Using the Sure Petcare App together with Sure Petcare Connected products – including the SureFlap® Microchip Cat Flap Connect, SureFlap Microchip Pet Door Connect, SureFeed® Microchip Pet Feeder Connect and the Felaqua® Connect – enables you to monitor the whereabouts of your pet, ensure your pet is fed at regular intervals, keep track of your pet’s daily activities and behavior, and much more.

We are committed to protecting and respecting your privacy as required by applicable protection laws and regulations in the UK and other jurisdictions in which we operate.

This Privacy Policy informs you of our policies regarding the collection, use, process and disclosure of personal data when you use our App and the Services. This Privacy Policy together with our End User License Agreement available here [[https://surehub.io/eula/en/SurePetcareApp-EULA-en\(June2023\).pdf](https://surehub.io/eula/en/SurePetcareApp-EULA-en(June2023).pdf)] (“**EULA**”) and any terms and conditions governing your purchase of the App or the Services (collectively with the EULA, the “**Terms of Use**”) and any updates to the same, applies to your use of:

- our App once you have downloaded a copy of the App onto your mobile telephone or handheld device (“**Device**”); and
- any of the services accessible through the App (“**Services**”).

For the purpose of the UK Data Protection Act 2018, the data controller is SureFlap Limited (company registration no. 6399085) whose registered office is at Ground Floor Building 2030, Cambourne Business Park, Cambourne, Cambs, CB23 6DW.

If you have any questions about this Privacy Policy or how Sure Petcare processes your personal data when providing the Sure Petcare App, please contact us where indicated in the “Contact Information” section below.

### Categories of Personal Data Collected

We collect personal data from you when you download and use the App or provide your data directly to us. When you download the App and register a user account, we ask you to provide the following information:

- Name;
- Username and password;
- Email address;
- Personal description and photograph (optional);
- Country; and
- Pet details (Name, species, gender, microchip number). Note that you may provide an image of your pet for your dashboard, in which case, the App will request access to your device’s photo library.

When you use the App, we collect information such as:

- IP address;
- device ID(s);
- information concerning your pet’s location and movements, temperature, heart rate, feeding habits, and so forth, depending on which Services you are using; and
- log data generated by the App and Services to the extent it includes personal data (such as activity logs indicating the time and date of use and location data if you have enabled this feature on the App).

You may withhold personal data if (for example, you can enable or disable location services when you use our Services at any time through your Device settings); however, if you choose to do so, certain App features or Services may not function correctly.

## Use of Personal Data

We use your personal data to:

- provide the App, Services, and related customer support, to manage our customer relationship with you;
- conduct statistical analysis, undertake necessary security and user authentication checks, allow software integration with other Services that you use, track your use of the App and/or for other internal purposes, such as evaluating, providing, and improving the App and Services;
- provide you with promotional offers and information regarding products and Services from Sure Petcare or third parties where you have accepted or consented to receive such offers and information via the App or otherwise;
- provide aggregate statistical data to advertisers and to our third party partners; and
- generate aggregate data through the anonymization of your personal data.

Where applicable laws require a legal basis to process personal data, we rely on the following lawful bases:

- performance of the contract entered into between you and Sure Petcare;
- our legitimate interests as described above, including to enhance and improve the App and tailor our communications to you;
- where processing your data is necessary to comply with legal obligations; and
- with your consent or at your direction, such as where you consent to receive direct marketing materials from us.

Where we process your personal data on the basis of your consent, you may have the right under applicable law to withdraw such consent at any time without affecting the lawfulness of the processing based on the consent before its withdrawal. Where applicable, you may withdraw consent, either through your account settings or by contacting us where indicated in below.

## Sharing and Transfer of Your Personal Data

We may share or otherwise disclose your personal data to the following categories of recipients in the following circumstances:

- Our corporate affiliates: to fulfil the purposes specified above in accordance with this Privacy Policy;
- Veterinary practices: if you have agreed to this when signing up for your account to use the App, we may disclose your personal data and pet data to your designated veterinary practice for the purposes of monitoring your pet's health and wellbeing;
- Business partners, suppliers and sub-contractors: to provide and improve the App, as well as for specialized services such as customer service, networking, billing, marketing, hosting, data processing and other services related to the App, as well as analytics and search engine providers that assist us in improving and optimizing the App and Services;
- Law enforcement authorities, courts, and administrative or regulatory bodies: to comply with applicable legislation, a court order or legal process;
- Other third parties as necessary: for purposes such as to protect and defend our (or our licensor's) rights or property, prevent fraud or violations of our Terms of Use, and ensure the personal safety of other users of the App and Services (or the public at large).

- Potential purchasers or investors: in the event that we sell, assign or transfer some or all of our business or assets to a successor or acquirer, or if we are acquired by or merge with a third party, or if we file for bankruptcy or becomes insolvent, we may disclose, sell, assign or transfer all of your personal data as part of the transaction.

Your use of the App and Services may involve the transfer, storage and processing of your personal data in jurisdictions outside your country of residence. Please note that the privacy and data protection laws of such jurisdictions may not be as comprehensive as those in which you reside, in which case Sure Petcare will take measures to ensure your personal data is protected in accordance with applicable law. Where applicable law requires your consent for such transfers, you agree to the transfer by submitting your personal data to Sure Petcare.

### **Accounts Synchronisation**

As the Company provides or plans to provide connected services to you, when you create your account with the App the Company shall automatically create your accounts in other applications offered and maintained by the Company to facilitate your use of the Company products and navigation (the “**Synchronised Account**”).

### **Deleting your Account**

If you choose to delete your account, all your personal data shall be irretrievably deleted except for the right of the Company to keep certain data in line with its legal obligations and applicable data protection laws. When you delete your account, your personal and associated data in the Synchronised Account shall be deleted automatically.

In particular, the Company shall keep your personal data to in relation to:

- Direct sales data from purchases made with the App.
- Support case information.
- Other applicable data for establishment, exercise or defense of legal claims, preventing fraud/ensuring security, etc.

Please note that the account deletion process is separate from the App deletion process. If you choose to delete the App and not the account, all your personal data in the account shall be saved and processed as established by this Privacy Policy.

### **Cookies and Similar Technologies**

We may use cookies and/or similar technologies to provide the App and collect analytics data related to use of the App and Services. For example, Sure Petcare connected products may utilize Google Analytics to monitor use of the App, better understand how our customers are implementing the Services, and to improve our products and Services.

### **Security**

We have implemented security policies, rules and technical measures designed to protect and safeguard the personal data from unauthorized access, improper use or disclosure, unauthorized modification, unlawful destruction or accidental loss. All of our employees and data processors that have access to, and are associated with, the processing of your personal data, are obliged to respect the confidentiality of your personal data. However, we cannot guarantee the security of your data, which may be compromised by unauthorized access to or use of the App.

### **Links to Other Sites**

The App and Services may contain links to other sites. Other sites may also reference or link to the app or Services. We are not responsible for the privacy practices or the content of such other online sites, and any information collected by these third-party online sites is not governed by this Privacy Policy. We assume no responsibility or liability whatsoever for the policies (including privacy policies), practices, actions or omissions of such third parties.

### **Your Rights and Choices**

You can opt out of marketing emails by utilizing the “unsubscribe” link or other mechanism noted in marketing emails you receive from us. You may also request to opt out of marketing emails directly, including those regarding offers from third parties, by contacting us through one of the methods specified below, and sharing the email address at which you are receiving marketing emails.

In accordance with applicable law (including relevant exemptions, as applicable), you may also have the right to object to or request restriction of processing of your personal data, as well as the right to request access, rectification, erasure and portability of your personal data. To exercise your rights where they apply, please contact us through one of the methods specified below. Where applicable, you also have the right to lodge a complaint with a data protection authority.

### **Retention and Deletion of Your Personal Data**

We may retain your personal data for as long as needed to provide you with the App and Services described in the Terms of Use. This often means that Sure Petcare will keep personal data for the duration of your account, which may be terminated in accordance with the Terms of Use. Please note, however, that where applicable legislation requires us to do so, we may be required to keep records of your personal data even after such termination.

### **Contact Information**

In the event that you wish to learn more about our data privacy practices or to make a complaint about how we processes your personal data, please contact us:

**By phone:**

0800 0124511

(or +44 1954 211664 ext 2 if you are outside of the UK)

**By email:**

[enquiries@sureflap.co.uk](mailto:enquiries@sureflap.co.uk)

**Online:**

Go to <https://www.surepetcare.com/en-gb/support> and enter the information requested in the “Submit an Enquiry” form at the bottom of the page.

**By Postal Mail:**

SureFlap Ltd.  
Ground Floor Building 2030  
Cambourne Business Park  
Cambourne, Cambs, CB23 6DW  
United Kingdom

We will endeavour to respond to your request as soon as possible.

### **Change to this Policy**

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on the App.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are updated by us.