



Privacy Notice

1. Important information and who we are

Kaya Consultancy Group Limited ("KCG") has created this privacy notice in order to demonstrate our firm commitment to protect-ing and respect-ing your per-son-al data (your "information"). The privacy and security of your information is very important to us. This privacy notice is intended to provide you with details about how any information that we collect from you, or that you provide to us, will be processed. It is therefore also intended to assist you in making informed decisions about your use of our website. Please read the following information carefully to understand our practices regarding your information and your personal data and how we will use and protect it in all of your interactions with KCG.

Who we are

KCG is company that operates wholly through a single legal entity, based in England. We operate with one further trading brand, Feet Street (www.feetstreet-ec4.com) that is also covered by this Privacy Notice.

It is important that you read this privacy notice together with any other privacy notice we may provide on specific occasions when we are collecting or processing your information, so that you are fully aware of how and why we are using your information.

You can contact KCG at any time as follows:

- By emailing info@kaya-consult.com for questions about this privacy notice or how we use your information or questions about our products and services
- By writing to us at: Privacy Team, Kaya Consultancy Group, 71-75, Shelton Street, Covent Garden, London, WC2H 9JQ

2. What information do we collect?

Our websites are published by WIX on behalf of KCG. KCG do not collect any information about individuals using this website or our services, except where it is specifically and knowingly provided by them, or as otherwise explained in this privacy notice.

We will collect information about you that you give us by filling in forms on our websites (include the "contact us" form), subscribing to our newsletter, or registering to become a model, or by corresponding with us, whether by phone, email or otherwise. We will also collect information that you provide when you register to use our website, search for a product or services, or report a problem with our website.

Examples of the information that you might provide to us are as follows:

- Identity data including your first name and last name
- Contact data including your email address, telephone numbers
- Technical data including IP address, any login data, and other technology you might use to access this website



- Marketing and communications data including your preferences in receiving marketing from us and your communication preferences
- There will also be some limited information that we may collect about you on our websites. On each of your visits to our websites, we will automatically collect standard cookies – please refer to section 7 below of this privacy notice for further information about this.

3. Why we need to collect and use your information

We need to collect your information in order to be able to deliver the services or products you request from us, and to fulfil any orders or contracts you place with us. For example, if you visit the KCG or other KCG brand websites and register as a member, we need to use your name and email address to send you the welcome pack and member information. If you enquire about services or accept the delivery of services, you accept that KCG will store your details in our database for the purposes of fulfilling your enquiry and/or contract.

Any other processing of your personal data will either be with your consent (for example, we will only send communications about special offers to members or subscribers who tell us they want to receive this) or because we are legally required to process it.

4. How we use your information

Your personal data collected through our websites will only be used for the purposes for which it was provided by you. The information collected will be used to:

- Send you the information you have requested and/or enable us to provide the products, goods or services that you have requested from us
- Set up contact details for you on our customer management database
- Fulfil the terms of any contract with you
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests
- Ensure that content from our website is presented in the most effective manner for you
- Provide information that may be useful to you, if you have consented to this, such as offers on products or services from KCG and affiliate partners. We may contact you by email or phone
- Notify you of changes to our services
- Anticipate and resolve problems with any services supplied to you
- Send statements, invoices and messages and collect payments should you contract with us
- If you do not want us to use your data on this way, or if you want to stop receiving these messages from us, please refer to the “How to opt-out” paragraph at section 12 of this privacy notice.
- We do not intend to transfer your information outside of the EU.



We may also use your information to administer our website and for our own internal operational and administrative purposes only, including troubleshooting, data analysis, testing, and as part of our efforts to keep our website safe and secure. We may also use your IP address to help diagnose problems with our server and to administer our website only.

5. How long do we keep your information?

We will retain your information for the following time periods:

- If we hold your information for the purposes of a subscription order or contract you have placed with us, we will hold your information for as long as the contract is in place for the goods or services you ordered from us, and for a reasonable period after the contract terminates or expires, to ensure we can still answer any queries you might have about the services you had received, and to satisfy any legal, accounting or reporting requirements
- If we hold your information for the purposes of a quote or subscription, but you did not ever place an order with us, we will hold your information for a reasonable period after providing the quote or survey (in case you do decide to place an order with us)
- In addition, if we hold your information because you have told us you are happy to receive communications and newsletters from us, then we will hold this for a reasonable period of time, and until you tell us you no longer want to receive those communications (as you can unsubscribe at any time)
- If there is any information we hold about you due to a legal requirement, we will hold it for as long as we are legally required to do so

You have various rights in relation to the information we hold about you, including rights to access your information and rights to have it deleted from our systems. Please refer to section 8 for more information about this.

6. Who we share your information with

We take your privacy seriously, and we will only share your data with third parties in limited circumstances. We require all third parties to respect the security of your personal data and to treat it in accordance with the law.

By using our website, you agree that we have the right to share your personal information with:

- Carefully selected suppliers and partners who are fully committed to protecting your data (for the purposes of performing any contract we enter into with you). We do sometimes use third party suppliers to help us deliver services and fulfil customer orders
- External support services (including any IT service providers) for the purposes of providing administrative and technical support to KCG, including with our websites, to ensure we can deliver your order and fulfil our contract with you
- Professional advisers including auditors and insurers



- Where we are under a duty to do so in order to comply with any legal or regulatory obligation, or to protect the rights, property or safety of KCG and our customers. This includes exchanging information with other companies and organisations where we are legally required to do so, for example for the purposes of fraud protection and credit risk reduction
- We might also share anonymised, non-personal data (including aggregated statistics and group data) about traffic patterns of our website visitors with partners or other third parties. We do not disclose information about identifiable individuals to any third-party advertisers on our website, but we may provide them with aggregate information about our users (for example, we may inform them that 500 women aged under 30 have clicked on their advertisement on any given day). We may also use such aggregated information to help advertisers reach the kind of audience they want to target (for example, women in a certain postcode area). However, we do not sell or share any information or personal data about individual users or any identifiable individual.

7. Cookies

What are cookies?

As with most other commercial websites, our websites use a standard technology called 'cookies'. Cookies contain information that is transferred to your computer's hard drive.

A 'cookie' is a very small text document, which often includes an anonymous unique identifier. For further information, visit www.aboutcookies.org

How we use cookies

We use the following cookies on our website:

Strictly necessary cookies - These are cookies that are required for the operation of our websites. They include, for example, cookies that enable you to log into secure areas of our website

Analytical/performance cookies - These allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily. We use cookies operated by Google for these purposes.

Functionality cookies - These are used to recognise you when you return to our websites. This enables us to personalise our content for you or remember your preferences. We use cookies operated by Twitter, Craft CMS, PHP and CloudFlare for these purposes

For example, we use cookies to record information about a user's access to this website. Users may view the website without the use of cookies by leaving the website, disabling cookies in their Internet browser and re-entering the website, but this may limit your access to this website or the functionality of certain



pages within the website. By using this website without disabling cookies, you consent to us collecting and using information obtained from cookies.

Information gathered through cookies and web server logs may include the date and time of visits, the pages viewed, time spent at our web-site, and the websites visited just before and just after our website.

We may collect information about your computer, including, where available, your IP address, operating system and browser type, for system administration purposes, and to report aggregate information to any third-party advertisers on our website. This is statistical data about our users' browsing actions and patterns and does not identify any individual.

Please note that any third-party advertisers on our website may also use cookies, over which we have no control.

Why we use cookies

As you browse on our websites, the websites use its cookies to differentiate you from other users, in order to make sure you don't see the same content repeatedly, to deliver content specific to your interests, and to help provide you with an excellent user experience. They help us to improve our website and to deliver a better and more personalised service. They also save you from re-inputting information when you return to our website.

Cookies, in conjunction with our web server's log files, also allow us to calculate the aggregate number of people visiting our website and to check which parts of the website are most popular. This helps us gather feed-back in order constantly to improve our website and better serve our customers.

8. Your rights in relation to your information

Your personal data is also protected by the Data Protection Act 2018, the General Data Protection Regulation (and any local other legislation and any legislation or regulations that might supersede this) (the GDPR). KCG takes its obligations under the GDPR seriously, including the requirement that any personal data we use and process must be collected for a specified and legitimate purpose, must be accurate and kept up to date, and we must ensure the security of your personal data is maintained, including against accidental loss and unauthorised access.

You also have various rights under the GDPR in relation to your personal data, including the following:

- You have rights to access, correct, erase, restrict or object to your personal data being used by KCG
- You have the right to data portability, which allows you to obtain and reuse your personal data for your own purposes across different services
- You have the right to withdraw your consent to KCG using your personal data
- You also have the right to make a complaint with the data protection authority in the UK (the Information Commissioner's Office — <https://ico.org.uk/>)



If you want to exercise any of these rights, please contact us at info@kaya-consult.com. 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 for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than one month if your request is particularly complex or you have made a number of requests. In this case, we will notify you of this and will keep you updated about our progress.

9. Changes to this notice

We keep our privacy notice under regular review and we will place any updates on this web page. You should regularly check this notice for updates.

This privacy notice was last updated in January 2021.

10. Your consent

By using this website, you consent to our collection and use of your information as described in this privacy notice.

11. How we maintain the security of your information

This website has robust security measures in place to try to prevent the loss, misuse and alteration of the information under our control.

We treat all personal data that we hold with the utmost care and security. Subject to the terms of this notice and any contract that we have in place with you, any details you provide to us or that we store will remain confidential.

The data that we collect from you will be stored on our secure servers. Once we have received your information, we will use strict procedures and security features to prevent unauthorised access. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential.

Unfortunately, the transmission of information via the internet can never be guaranteed to be completely secure. While we will do our best to protect your personal data once we receive it on our website and servers, we cannot guarantee the security of your data when it is transmitted to our website over the internet, as there are certain matters that will be outside of our control (for example, any viruses that might exist on your computer). The initial transmission of your personal data is therefore at your own risk. Once your data has been received on our platforms, however, we take ownership for its security as set out in this privacy notice.



12. How to opt-out

You have the right at any time to ask us not to process your personal data. We do need to process certain personal data to be able to fulfil any order or contract that you place with KCG (including your name, email address, phone number and postcode), so please be aware that any opt-out in relation to this data will have an impact on our ability to deliver our obligations to you.

From time to time, we do also send members and subscribers information about our products, services and special offers. We only send this to individuals who have specifically given their consent to receive these communications, at the point they submit an enquiry on our website. You can opt-out of receiving these communications at any time by emailing info@kaya-consult.com or using the "unsubscribe" link at the bottom of any emails you receive from us.

Our website may also, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies, and we do not accept any responsibility or liability for these policies. Please check these carefully before you submit any personal data to those websites.

13. Contacting KCG

You can con-tact us using the following contact details if you have any general queries about products or services or to inform us of any changes or updates to your information, or if you have any questions about this privacy notice or how we use your personal data.

Please contact us at info@kaya-consult.com or write to us at Kaya Consultancy Group, 71-75, Shelton Street, Covent Garden, London, WC2H 9JQ