

## Privacy & Cookies Policy

### BACKGROUND:

Jamarie Ltd understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website: [www.minimealtimes.com](http://www.minimealtimes.com) or who uses (“our app or our website”) and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy & Cookies Policy carefully and ensure that you understand it. Your acceptance of the Cookies part of this Privacy & Cookies Policy will occur when you tick the consent box on our app or our website or our website and your acceptance of the privacy part of this Privacy & Cookies Policy is deemed to occur upon your first use of our app or our website **AND/OR** You will be required to provide express consent by reading and accepting this Privacy & Cookies Policy when signing up for an Account or Subscription. If you do not accept and agree with this Privacy & Cookies Policy, you must stop using our app or our website or website immediately.

### 1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

<b>“Account”</b>	means an account required to access and/or use certain areas and features of our app or our website;
<b>“Cookie”</b>	means a small text file placed on your computer or device by our app or our website when you visit certain parts of our app or our website and/or when you use certain features of our app or our website. Details of the Cookies used by Site are set out in Part 14 below; and
<b>“Cookie Law”</b>	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011;

### 2. Information About Us

our app or our website is owned and operated by Jamarie Ltd a Limited company registered in England under company number 10798832

Registered address: Carpenter Court 1 Maple Road, Bramhall, Stockport, Cheshire, United Kingdom, SK7 2DH

VAT number: not applicable

Data Protection Officer & Representative: Marie Farmer

Email address: [marie.farmer@minimealtimes.com](mailto:marie.farmer@minimealtimes.com)

Telephone number: 07881366681

Postal address: Carpenter Court 1 Maple Road, Bramhall, Stockport, Cheshire, United Kingdom, SK7 2DH

### 3. **What Does This Policy Cover?**

This Privacy & Cookies Policy applies only to your use of our app or our website. our app or our website may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

### 4. **What Is Personal Data?**

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

### 5. **What Are My Rights?**

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy & Cookies Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 15. The ICO has more guidance on their website, [\[here\]](#)
- b) The right to access the personal data we hold about you. Part 13 will tell you how to do this. The ICO has more guidance on their website, [\[here\]](#)
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 15 to find out more. The ICO has more guidance on their website, [\[here\]](#)
- d) The right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 15 to find out more. The ICO has more guidance on their website, [\[here\]](#)
- e) The right to restrict (i.e. prevent) the processing of your personal data. Please contact us using the details in Part 15 to find out more. The ICO has more guidance on their website, [\[here\]](#)
- f) The right to object to us using your personal data for a particular purpose or purposes. Please contact us using the details in Part 15 to find out more. The ICO has more guidance on their website, [\[here\]](#)
- g) The right to withdraw consent. This means that, if we are relying on your

consent as the legal basis for using your personal data, you are free to withdraw that consent at any time. Please contact us using the details in Part 15 to find out more.

h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases. Please contact us using the details in Part 15 to find out more.

i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner’s Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner’s Office. We would welcome the opportunity to resolve your concerns ourselves however, so please contact us first, using the details in Part 15.

## 6. What Data Do You Collect and How?

Depending upon your use of our app or our website, we may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table. Please also see Part 14 for more information about our use of Cookies and similar technologies.

Data Collected	How We Collect the Data	Lawful Basis
Identity Information including first name, last name, title, gender, date of birth	Via our app or our website including via any installed plugins, over the telephone or via email or social media interaction, and other general marketing. Sometimes data may be collected automatically through these mediums.	Consent Legal Obligation Legitimate Interest
Contact information including address, email address, telephone numbers	Via our app or our website including via any installed plugins, over the telephone or via email or social media interaction, at consumer or trade shows, at retail shops where we host pop up events, marketing events, and other	Consent Contract Legal Obligation Legitimate Interest

	general marketing Sometimes data may be collected automatically through these mediums.	
Payment information including card details, bank account numbers, CVV codes	Via our app or our website, payment processing partners and servers. Sometimes data may be collected automatically through these mediums.	Contract Legal Obligation Legitimate Interest
Profile information including login details, purchase history	Via our app or our website and servers. Sometimes data may be collected automatically through these mediums.	Contract Legitimate Interest
Technical information including IP address, browser type and version, country, operating system	Via our app or our website and servers. Sometimes data may be collected automatically through these mediums.	Legal Obligation Legal Interest
Data from third parties	Social media platforms and insights tools. Sometimes data may be collected automatically through these mediums.	Contract Legitimate Interest
Personal Data pertaining to your children in creating Child Profiles (as defined in our Terms and Conditions) e.g. name, gender, age, date of birth, height, weight, dietary restrictions	Via our app or our website as per identity information	Contract Legal Obligation Legitimate Interest

It is possible that certain personal data, Child Profile data may be categorised as ‘health data’. All health data will be collected only with your consent and processed in accordance with all current laws and regulations. Please contact us using the details below in Part 15 for further information about the particular data protection mechanisms used by us in respect of the handling of your health data.

## 7. How Do You Use My Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data which comprises consent, contract, legal obligation and legitimate interests. More details on each lawful basis and examples of how we use your personal data under each basis are as follows:

### Consent

Where you have expressly provided your consent to receive communications from us such as newsletters, emails, marketing materials, news and events, new services, new products and exclusive events. Consenting to the use of non essential cookies on our app or our website is used to make your experience on our app or our website more

seamless by, for example but not limited to, remembering pages you have previously visited, products you have clicked on, automatically generated forms.

### **Contract**

Your personal data is necessary for us to administer the pre-purchase, purchase and contractual relationship with you so that we may communicate with you about subscription orders, after sales service, set up and manage accounts, complete purchases or payments, store and record your purchases and previous orders made via our app or our website and keeping you updated with any changes in our terms and policies as well as offering you additional products, services and benefits as a valued customer of ours.

### **Legitimate Interest**

Where you have provided your email address or other personal data to us, either online or offline, we may add you to our database for emails to contact you about new products, news and events, exclusive services. Certain personal data is also needed for legitimate purposes to prevent fraud, security breaches, legal violations, for us to help recommend products and services to you and to understand more about our customer and targeted customer base as well as to help our app or our website to switch to the correct currency, language if applicable. We may also use the personal data collected under this lawful basis to help us analyse and administer, improve and update our app or our website for better experience, better products and service we offer.

### **Legal Obligation**

Certain personal data you provide us is necessary for us to fulfil our legal obligations as a business for example, verifying parental responsibility, your age and appropriate use of our app or our website, preventing fraud, security breaches and complying with our tax and accounting obligations where needed.

### **Personal data relating to children**

our app or our website is not intended for use by anyone under the age of 18 but you may be required to provide certain personal data for your children in order to use and benefit from the services offered through our app or our website. We will only ever collect personal data of children where we have a lawful basis which may be consent, contract, legitimate interest or legal obligation. Consent for the use of personal data of children under the age of 13 has to be provided by an adult who has parental responsibility for that child/children. We reserve the right to ask you for evidence that you have parental responsibility. Any personal data relating to your children will be afforded the same rights as your personal data as set out in Part 5. Furthermore, We do not conduct any automatic user profiling with children's personal data and our app or our website is set up to have age appropriate safeguards in place. Personal data of your children may be shared as set out in Part 10. Please contact us using the details in Part 15 for further information.

You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out. See Part 11 for more details.

Third Parties whose content appears on our app or our website may use third-party Cookies,

as detailed below in Part 14. Please refer to Part 14 for more information on controlling cookies. Please note that we do not control the activities of such third parties, nor the data that they collect and use themselves, and we advise you to check the privacy policies of any such third parties.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 15.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

## **8. How Long Will You Keep My Personal Data?**

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Even if we delete your personal data, it may still exist on backup or archival media for legal, tax or regulatory purposes.

## **9. How and Where Do You Store or Transfer My Personal Data?**

We will store or transfer some of your personal data within the UK or the European Economic Area (the "EEA"). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the Data Protection Legislation, GDPR, and/or to equivalent standards by law.

We may store or transfer some or all of your personal data in countries that are not part of the EEA. These are known as "third countries" and may not have data protection laws that are as strong as those in the UK and/or the EEA. This means that we will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation as follows:

We may use specific contracts with external third parties that are approved by the European Commission for the transfer of personal data to third countries. These contracts require the same levels of personal data protection that would apply under the Data Protection Legislation. More information is available from the [European Commission \(https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu\\_en\)](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu_en).

Please contact us using the details below in Part 15 for further information about the particular data protection mechanisms used by us when transferring your personal data to a third country. The security of your personal data is essential to us and to protect your data, we take a number of important technical and organisational measures, including the following:

- limiting access to your personal data to those employees, agents, consultants, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality and aware of any obligations relating to the use of your personal data by them; and
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so.

**10. Do You Share My Personal Data?**

**Subject to part 9**, We will not share any of your personal data with any third parties for any purposes, subject to the following exception[s].

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. We may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority. **We may also need to share your personal data to relevant authorities for example to facilitate the detection of crime or collection of taxes or duties.**

We may sometimes contract with the following third parties to supply certain services.

Recipient	Activity Carried Out	Sector	Location*
[Apple] [Alphabet]	Payment processing, order processing Customer Relationship Management	digital marketing and data processing	UK/ EU
[Apple] [Paypal] [Alphabet]	Payment processing Gateway	Subscription order fulfilment	UK/ EU
AWS	Storage and processing of data	Data storage	UK/ EU
App administrator.developer Appentus Technolgies	Maintenance such us updates to prevent hacking and cybersecurity	App administration	India
JAMARIE LIMITED	Marketing	Marketing	UK/ EU
Dietician consultants City Dieticans	Providing Us with data and updated information for our	Consultation services	UK/ EU

	app or our website services		
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**\*Location**

Personal data collected by Us may be stored and processed in your region, in the United States, or in any other country where Jamarie Ltd or its affiliates, subsidiaries or service providers maintain facilities. Alternatively, different storage locations may be chosen to operate efficiently, to improve performance, and to create redundancies to protect the personal data in the event of an outage or other problem. All data stored outside of the United Kingdom or the EEA will be processed in accordance with this Privacy Policy.

**11. How Can I Control My Personal Data?**

11.1 In addition to your rights under the Data Protection Legislation, set out in Part 5, when you submit personal data via our app or our website, we aim to give you strong controls on **our** use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails and at the point of providing your details and by managing your Account).

11.2 If you are based in the United Kingdom, you may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service (“the TPS”), the Corporate Telephone Preference Service (“the CTPS”), and the Mailing Preference Service (“the MPS”). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

**12. Can I Withhold Information?**

You may access certain areas of our app or our website without providing any personal data at all. However, to use all features and functions available on our app or our website you may be required to submit or allow for the collection of certain data.

You may restrict our use of Cookies. For more information, see Part 14.

**13. How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 15.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within **14 calendar days** and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases,



however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

#### 14. **How Do You Use Cookies?**

our app or our website may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of our app or our website and to provide and improve our products **and** services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

The Cookie Law states that we can store Cookies on your device if they are strictly necessary for the operation of our app or our website. For all other types of Cookies we need your permission. [You can at any time change or withdraw your consent from the Cookie Declaration on our app or our website <https://www.minimealtimes.com/legal>] [Our Cookie Declaration also lists all the Cookies present on our app or our website.

By using our app or our website, you may also receive certain third-party Cookies on your computer or device: (a) **Preference cookies** enable a website to remember information that changes the way the website behaves or looks, like your preferred language or the region that you are in, (b) **Statistic Cookies** help web application owners to understand how visitors interact with web apps by collecting and reporting information anonymously or (c) **Marketing Cookies** are used to track visitors across different websites or applications. The intention is to display ads that are relevant and engaging for the individual user and thereby more valuable for publishers and third party advertisers.

Third-party Cookies are used on our app or our website for analytics and SEO such as Facebook Ads or Google Analytics. These Cookies are not integral to the functioning of our app or our website and your use and experience of our app or our website will not be impaired by refusing consent to them. You do not have to allow us to use these Cookies, however whilst our use of them does not pose any risk to your privacy or your safe use of our app or our website, it does enable us to continually improve our app or our website, making it a better and more useful experience for you.

All Cookies used by and on our app or our website are used in accordance with current Cookie Law.

Before non-essential Cookies are placed on your computer or device, you will be shown a pop up screen requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of some or all of those Cookies; however certain features of our app or our website may not function fully or as intended. You will be given the opportunity to allow only first-party Cookies and block third-party Cookies or choose which third party Cookies you are consenting to. Certain features of our app or our website depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser’s settings as detailed below, but please be aware that our app or our website may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing

them.

You may contact us for more details on strictly necessary and third party Cookies we use.

In addition to the controls that we provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access our app or our website more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

#### **15. How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Marie Farmer):

Email address: [info@minimealtimes.com](mailto:info@minimealtimes.com)

Postal Address: Carpenter Court 1 Maple Road, Bramhall, Stockport, Cheshire, United Kingdom, SK7 2DH

## 16. **General**

You may not transfer any of your rights under this Privacy & Cookies Policy to any other person. Subject to our app or our website terms and conditions, anyone under the age of 18 should not use our app or our website but in the event someone under the age of 18 uses our app or our website and accepts this Privacy & Cookies Policy without parental responsibility consent or on another unauthorised basis, We shall not be liable for any breach of the Data Protection Legislation relating to the personal data We collect as a result of such use. We may transfer our rights under this Privacy & Cookies Policy where we reasonably believe your rights will not be affected.

If any court or competent authority finds that any provision of this Privacy & Cookies Policy (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this Privacy & Cookies Policy will not be affected.

Unless otherwise agreed, no delay, act or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy.

This Privacy & Cookies Policy will be governed by and interpreted according to the law of England and Wales. All disputes arising under the Agreement will be subject to the exclusive jurisdiction of the English and Welsh courts.

## 17. **Changes to this Privacy & Cookies Policy**

We may change this Privacy & Cookies Policy from time to time. This may be necessary, for example, if the law changes, or if we change **our** business in a way that affects personal data protection.

Any changes will be immediately posted on our app or our website and you will be deemed to have accepted the terms of the Privacy & Cookies Policy on your first use of our app or our website following the alterations. We recommend that you check this page regularly to keep up-to-date. This Privacy & Cookies Policy was last updated on October 29th 2019.