

Medidata Exchange Limited – Privacy Policy

1. Introduction to this Policy

1.1. This privacy policy (“**Policy**”) relates to:

1.1.1. the website at **www.lalu.co.uk** and any subdomain or any such related website and/or mobile application for such website (together the “**Website**”);

1.1.2. the Lалу Care service portal;

1.1.3. the Lалу Hub service portal;

1.1.4. the Lалу Tracker application; and

1.1.5. a platform application operated by Medidata Exchange Limited (trading as Lалу) for a Client and/or customers of that Client (any application as described in clauses 1.1.2 to 1.1.5 inclusive an “**Application**”).

1.2. You should read this Policy carefully as it contains important information about how we will collect, process, use and store your Information (as defined below in clause 3.1). In certain circumstances (see below), you will be required to indicate your Consent to the processing of your Information as set out in this Policy when you first submit such Information to or through the Website or an Application or otherwise in writing to us. For further information about Consent, see clause 6 below.

1.3. We may update this Policy from time to time in accordance with clause 16 below. This Policy was last updated on 8 June 2026.

2. About us and definitions

2.1. The terms “**Lalu**” or “**us**” or “**we**” refer to Medidata Exchange Limited and, where applicable, Lалу SA (Pty) Ltd (see further clause 2.2 below). We are a company limited by shares registered in England and Wales under company number 09481183 whose registered office is at Ty Derw, Lime Tree Court, Cardiff Business Gate, Cardiff, CF23 8AB, United Kingdom. The term “**you**” refers to the individual accessing and/or submitting Information to or through the Website or an Application or otherwise using our Services.

2.2. We, and where relevant our South African subsidiary, Lалу SA (Pty) Ltd. (see below in this clause 2.2 and also clauses 3.2 and 10.2 for further details of the entity and its activities), as the Data Processor or where relevant Data Controller for the purposes of UK GDPR, can be contacted via our Data Protection Officer via email to dpo@lalu.co.uk or post to Lалу, The Maltings, East Tyndall Street, Cardiff, CF24 5EA.

We and where relevant Lалу SA (Pty) Ltd, as the Data Processor or Data Controller are responsible for, and control the processing of or control your Personal Data in accordance with the UK General Data Protection Regulation 2021 (“**UK GDPR**”) and the Data Protection Act 2018 (“**DPA**”) and all other applicable laws and regulations which may be in force from time to time relating to the processing of Personal Data and privacy.

Without limiting the generality of the foregoing, where the context allows (where Personal Data is regarded by law as being created or processed in the Republic of South Africa (“**RSA**”), the terms Data Processor and Data Controller are deemed to include reference also to us and Lалу

SA (Pty) Ltd each being also a “responsible party” under the Protection of Personal Information Act (“**POPIA**”) of the RSA. Where contact is to be made for the purposes of POPIA to us or Lalu SA (Pty) Ltd, contact may be made by email to dpo@lalu.co.uk or by post to 8 Church Street, Durbanville, 7550, South Africa. Where the context requires, references to “**us**” should be construed as referring to Lalu SA (Pty) Ltd.

2.3. The following definitions apply in this Policy:

2.3.1. “**Application**” has the meaning given in clause 1.1.5;

2.3.2. “**Client**” or “**Clients**” means a client or clients of Lalu including, as applicable, relevant individuals, recruiters and third party requesters of medical records, reports and/or information (such as insurers, governmental agencies, clinical research providers and retail health providers);

2.3.3. “**Consent**” means freely given, specific, informed and unambiguous indication of your wishes given by a statement or clear affirmative action;

2.3.4. “**Data Controller**” and “**Data Processor**” are as defined in Article 4 of the UK GDPR and such expressions include where the context allows reference to the ‘responsible party’ in Section 1 of POPIA;

2.3.5. “**Data Subject Access Request**” a request to obtain confirmation as to whether or not Personal Data concerning a natural person is being processed pursuant to Article 15 of the UK GDPR and where the context allows Section 5 of POPIA;

2.3.6. “**DPA**” has the meaning given in clause 2.2;

2.3.7. “**Information**” has the meaning given in clause 3;

2.3.8. “**Lalu**”, “**us**” and “**we**” have the meanings given in clause 2.1;

2.3.9. “**Policy**” has the meaning given in clause 1.1;

2.3.10. “**Personal Data**” means any information that identifies or makes identifiable a natural (living) individual;

2.3.11. “**POPIA**” has the meaning given in clause 2.2;

2.3.12. “**RSA**” has the meaning given in clause 2.2;

2.3.13. “**Services**” means any services we provide to or in respect of you to any Client, healthcare professionals and other business partners, whether via or following use of our Website or any Application or any other services we provide to or in respect of you to a Client;

2.3.14. “**Website**” has the meaning given in clause 1.1.1;

2.3.15. “**you**” has the meaning given in clause 2.1; and

2.3.16. “**UK GDPR**” has the meaning given in clause 2.2.

In this Policy, “include”, “includes”, “including”, “such as” and similar words and expressions must be read as if followed by “without limitation” and references to clauses are to clauses of this Policy.

3. Information we may collect about you

3.1. When you use the Website, an Application and/or when you otherwise deal with us, or provide information to a third party (including but not limited to a recruiter, an insurer or another business partner of ours or your doctor or another healthcare professional) who provides information about you to us, we may collect, process, use and store the following information about you (“**Information**”):

3.1.1. personal information including first and last name, date of birth, title, photograph and/or likeness and any relevant insurance policy or NHS number;

3.1.2. contact information including one or more of current residential or business address, email address, employer, job title, and/or phone number, and, where relevant, the same in respect of your doctor, other healthcare professional or insurer or other service provider;

3.1.3. technical information including IP address, operating system, browser type and related information regarding the device you used to visit the Website or the Application, the length of your visit and your interactions with the Website or Application;

3.1.4. information obtained through forms completed by you on the Website, or the Application or otherwise in writing and provided to us, including information you provide when you register to use the Application, download the Application, provide information to facilitate our providing any of the Services or when you report any problem with the Website, any Application or any of our Services;

3.1.5. details of your use of our Website or any Application or any of our Services including traffic data and other communication data;

3.1.6. (if you are being considered for a job) recruitment information including biographical information such as education and employment history, references and right to work information (such as passport, driving licence and/or visa information);

3.1.7. compliance information including searches against international sanctions lists, criminal record databases, insurance claims databases and other compliance monitoring, reporting and remediation information;

3.1.8. marketing data, including your preferences in receiving marketing from us and dietary preferences for events we may operate;

3.1.9. information relating to your health or medical records (“**Special Category Data**”), obtained by any means described above and which will be handled in accordance with clause 3.2 below; and

3.1.10. details of any enquiries made by you through the Website or the Application or otherwise in writing and provided to us, together with details relating to subsequent correspondence (if applicable).

3.2. If you are an individual, any Special Category Data (information relating to your health or medical records) will be (as applicable) either or both (a) processed through the Website and/or

in the Application for the purposes of responding to a Data Subject Access Request made by you or on your behalf and/or included in a curated medical report created by clinical staff of ours, where you have requested such a report (through the Website or the Application) and/or (b) included in a curated medical report created by clinical staff of our wholly-owned subsidiary, Lalu SA (Pty) Ltd, where you have requested such a report (through the Website or the Application).

Further details of Lalu SA (Pty) Ltd are given in clause 10.2. Where (a) applies, please note that we will be processing relevant data as a Data Processor on behalf of a Data Controller (typically your doctor or other healthcare professional), where “Data Processor” and “Data Controller” are as defined in the UK GDPR. The processing of this Special Category Data will not be subject solely to this Policy where we are the Data Processor and you will also need to review the contents of the Data Controller’s (i.e. typically your doctor’s or other healthcare professional’s) privacy policy in respect of the processing of this Special Category Data and their privacy policy will take precedence. We have data processing agreements in place with relevant Data Controllers. Where (b) applies, this Policy applies to the report created and Lalu SA (Pty) Ltd will be the Data Controller and we will be the Data Processor.

3.3. We may monitor your use of the Website or the Application through ‘cookies’ and similar tracking technologies. We may also monitor traffic, location and other data and information about users of the Website or the Application. Such data and information, to the extent that you are individually identifiable from it, constitutes Information as defined above. However, some of this data will be aggregated or statistical, which means that we will not be able to identify you individually. See clause 15 below for further information on our use of cookies.

4. How long we keep your Information

4.1. Subject to clause 4.5, we will keep your Information only for the purposes set out in the table below (see clause 5).

4.2. We will only retain your Personal Data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purpose of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your Personal Data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect of our relationship with you. We are required to keep the information we collect as set out in clause 3.1 of this Policy for 6 years, unless instructed by the Data Controller to remove the Personal Data before this period.

4.3. If required, we will be entitled to hold Personal Data for longer periods in order to comply with our legal or regulatory obligations.

4.4. Where we hold the Information based on your express Consent and have no other legal basis for holding your Information, we will hold it until Consent is withdrawn.

4.5. In some circumstances you can ask us to delete your Personal Data – see clause 12 below for further Information.

5. Legal basis for processing your information

5.1. We may use your Information for different business purposes and in reliance on different legal bases, depending on the nature of our relationship with you and in accordance with applicable laws. In certain cases, the legal basis will be reliant on your consent and in other cases we will not require your consent provided we need to use the Information to perform our contractual and other legal obligations in respect of you as individual (including our

pre-contractual obligations) or we pursue our legitimate interests or there is another purpose required or permitted by applicable law. In accordance with the UK GDPR, the DPA and/or POPIA as applicable we may only process your Information if we have a “legal basis” (i.e. a legally permitted reason) for doing so. For the purposes of this Policy, our legal basis for processing your Information is set out in the table below.

Why we will process your Information	The legal basis for which is..
<p>To register you in the Website or in an Application and register you as a new user or subject of the Website, Application or our Services.</p>	<p>This is necessary for the performance of the contract between us and you or a Client of ours (such as a recruiter, an insurer or another business partner of ours or your doctor or another healthcare professional) in respect of you and Information is processed to enable us to provide the Services to you or to a Client of ours (such as a recruiter, an insurer or another business partner of ours or your doctor or another healthcare professional) in respect of you.</p>
<p>To operate, administer, correspond and provide Services to you or to a Client of ours (such as a recruiter, an insurer or another business partner of ours or your doctor or another healthcare professional) in respect of you.</p>	<p>This is necessary for the performance of our relevant contract and Information is processed to enable us to provide the Services to or in respect of you.</p>
<p>To administer and protect our business and the Website or Application including troubleshooting, data analysis and system testing.</p>	<p>This is necessary for the legitimate interests we pursue for running our business, provision of administration and network security.</p>

<p>To manage our relationship with you or our relevant Client including where relevant notifying you of any changes to the Website, Application or any Services.</p>	<p>This is necessary for the performance of the contract between us and you or our relevant Client in respect of you and Information is processed to enable us to provide the Services to our users.</p> <p>Outside of such, this processing is necessary for the legitimate interests we pursue to keep records up to date and to analyse how users use our Services, subject to you raising an objection under clause 12.6, requiring us to check that our interest in the processing is not overridden by the resulting risk to your rights and freedoms.</p> <p>This is also necessary for us to comply with our legal obligations, including obligations to inform you of any changes to our terms and conditions for the Website, Application or Services.</p>
<p>To conduct background checks prior to and thereafter while employing you or entering into a business relationship with your organization. Where relevant, to carry out employment and employment benefit-related administrative tasks.</p>	<p>This is necessary for the performance of the contract between us and you or a Client of ours (such as a recruiter, an insurer or another business partner of ours or your doctor or another healthcare professional) in respect of you to comply with applicable laws and otherwise processing will be for our legitimate interests and is subject to your rights in clause 12.</p>

Why we will process your Information	The legal basis for which is...
<p>To investigate and address any comments, queries or complaints made by you regarding your use of the Website or Application or the Services provided by us.</p>	<p>This is necessary for the performance of the contract between us and you or a Client of ours (such as a recruiter, an insurer or another business partner of ours or your doctor or another healthcare professional) in respect of you and information is processed to enable us to provide Services to our users. Outside of this, such processing is necessary for the legitimate interests we pursue of running our business and is subject to your rights in clause 12.</p>

<p>Where required by (but not limited to) any applicable law or any request or order from law enforcement agencies and/or HMRC and/or the Information Commissioner's Office or any other regulatory body or authority in connection with any investigations into or to help prevent unlawful activity including but not limited to fraud, terrorism and terrorism financing, money-laundering, identity theft and cyber crime.</p>	<p>This is necessary to comply with our legal obligations, including obligations relating to the protection of Personal Data.</p>
<p>To operate, administer, maintain and provide, analyse, develop, expand and improve the Website, Application and the Services.</p> <p>To ensure that content from the Website and/or Application is presented in the most effective manner for you and your device.</p> <p>To conduct research, statistical analysis and behavioural analysis (including anonymising data for these purposes).</p> <p>To provide insights based on aggregated, anonymous data collected through the research and analysis.</p> <p>To notify you about changes to the Website, the Application or any of the Services.</p> <p>To allow you to participate in interactive features of the Website or the Application, including inputting information.</p> <p>To bring or defend legal claims against us and our subsidiaries, to prevent or detect fraud or crime through our</p>	<p>This processing is necessary for the legitimate interests we pursue of running our business and is subject to your rights in clause 12.</p>

Why we will process your Information	The legal basis for which is...
<p>website or any Application, to obtain legal advice, support or representation in connection with any of these matters or any applicable law or any request or order from law enforcement agencies and/or HMRC and/or the Information Commissioner's Office or any other regulatory body or authority as referred to above</p> <p>To protect the safety and cyber and physical security of our systems and individuals who work for (and are otherwise present in the premises of) us and our subsidiaries</p>	
<p>To contact you for marketing purposes, including to deliver content and advertisements to you and to make recommendations to you about services which may interest you (see 'Marketing and Opting Out' in clause 7 below)</p>	<p>We send out marketing communications based on our legitimate interests of providing our business and keeping people informed about the services we offer. The method of communication may vary as set out below:</p> <ul style="list-style-type: none"> • we may send you information via post or, if you are dealing with us on behalf of a limited company or LLP, to your corporate email address; • we will only contact you via your personal email address if: <ul style="list-style-type: none"> (i) you have given your Consent to us or an applicable third party (see 'Marketing and opting out' in clause 7 below); or (ii) you have previously bought services from us and we are contacting you to let you know about similar goods and services that we offer (see 'Marketing and opting out' in clause 7 below). <p>You have the right at any time to let us know that you no longer wish to receive marketing communications from us.</p>

6. Your Consent to processing

6.1. As noted above, you will be required to give Consent to certain processing activities before we can process your Information as set out in this Policy. Where applicable, we will seek this consent from you when you first submit Information to or through the Website or the relevant Application.

6.2. If you have previously given Consent, you may freely withdraw such Consent at any time. You can do this by notifying us in writing (see clause 19 below).

6.3. If you withdraw your Consent, and if we do not have another legal basis for processing your information (see clause 5 above), then we will stop processing your Information. If we do have another legal basis for processing your information then we may continue to do so subject to your legal rights (for which see clause 12 below).

6.4. Please note that if we need to process your Information in order to operate the Website, the Application and/or provide our Services, and you object or do not consent to us processing your Information, the Website, the Application and/or our Services may not be available to you.

7. Marketing and opting out

7.1. Where you are dealing with us on behalf of a limited company or LLP, for business purposes, then we may contact you by email to your corporate email address about similar or related products that we offer. If you prefer not to receive any direct marketing communications from us, or you no longer wish to receive them, you can opt out at any time (see below).

7.2. Where you have previously ordered services from us, or been considered for employment, we may contact you by telephone, email and post about similar or related services and promotions or employment opportunities that may be of interest to you. We will inform you if we intend to use your data for such purposes and give you the opportunity to opt out of receiving such information from us. In addition, and if you have given permission, we may also contact you by telephone, email and post about our other products, services, promotions and special offers that may be of interest to you. We will inform you (before collecting your data) and seek your permission if we intend to use your data for such additional marketing purposes. If you prefer not to receive any direct marketing communications from us, or you no longer wish to receive them, you can opt out at any time (see below).

7.3. If you have given permission, we may contact you by post, telephone and email to provide information about products, services, promotions and other information we think may be of interest to you. We will inform you (before collecting your data) if we intend to use your data for such purposes. If you would rather not receive such marketing information from us, or you no longer wish to receive it, you can opt out at any time (see below).

7.4. We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

7.5. You have the right at any time to ask us, or any third party, to stop processing your information for direct marketing purposes. If you wish to exercise this right, you should contact us by sending an email to connect@lalu.co.uk or contact the relevant third party using their given contact details, giving us or them enough information to identify you and deal with your request.

8. Disclosure of your information

8.1. We may disclose your Information (including Personal Data and including where relevant and lawful Special Category Data):

8.1.1. to other companies within our group of companies (which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006) (and we will ensure they have appropriate measures in place to protect your Information);

8.1.2. to our business partners, service providers, professional advisers or third-party contractors to enable them to undertake services for us and/or on our behalf (and we will ensure they have appropriate measures in place to protect your Information);

8.1.3. to any prospective investor in or buyer or seller of any interest in any debt or equity in or any of the assets and liabilities of our company or any of its subsidiaries (and their representatives) in the event that a sale or purchase of any of these things is contemplated (and we will ensure they have appropriate measures in place to protect your Information);

8.1.4. if we are under a duty to disclose or share Personal Data in order to comply with any legal obligation, including (but not limited to) any request or order from law enforcement agencies and/or HMRC and/or the Information Commissioner's Office or any other regulatory body or authority in connection with any investigation to help prevent unlawful activity; we may in certain circumstances consider ourselves compelled proactively to supply information to relevant authorities if we suspect a breach of law or have safeguarding concerns; and

8.1.5. to other third parties if you have specifically consented to us doing so. Third parties who may have access to your Personal Data in connection with your health may include doctors and other healthcare professionals, any Client or actual or prospective employer or family member or carer whom you authorize us to contact in this regard, and also third party IT system suppliers of ours who may need some level of access for technical purposes in connection with the operation of systems. Finance, legal and regulatory professionals may also have access to your Personal Data in connection with the purposes described above.

8.2. We may create alone or with assistance from selected third parties aggregated, anonymous information (i.e. information from which you cannot be personally identified), or insights based on such anonymous information, and such information may be disclosed to such third parties. Such third parties may include analytics and search engine providers to assist us in the improvement, optimization, development and expansion of our business or the Website or Application or our Services and such third parties may include third party purchasers of such insights. In all such circumstances we will not disclose any information which can identify you personally and we will act in accordance with applicable laws.

8.3. If any part of our business is sold or integrated with another business your Information may be disclosed to our advisers and any prospective purchasers and their advisers and will be passed on to the new owners of the business.

8.4. Where we hold information on you and we obtained it for an initial purpose, we may with your consent in future apply it for a further, different purpose. It will be for you to decide at the time whether you want to agree to the data we hold being used for the further, different purpose.

9. Keeping your Information secure

9.1. We will use technical and organisational security measures, policies and procedures in accordance with good industry practice to safeguard your Information, including the use of data encryption as applicable. We limit access to your Information only to those of our and our subsidiary's employees, staff and other third parties on a business need to know basis. They will only process your personal data upon our instructions, and they are subject to a duty of confidentiality. See clause 10 regarding international transfers of your information.

9.2. Where we have given you (or where you have chosen) a password that enables you to access an Application or secure part of our Website, you are responsible for keeping this password confidential. Please do not share this password with anyone.

9.3. While we will use all reasonable efforts to safeguard your Information, you acknowledge that the use of the Internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any Information that is transferred from you or to you via the Internet. We have implemented procedures to respond to any suspected personal data breach or security incident and will notify you and relevant data protection regulators where we are legally required to do so in the event of any personal data breach or security incident.

10. Cross-border transfers of Information

10.1. We may on occasion transfer your Information outside the UK, EU or RSA to another jurisdiction for processing. Where Personal Data is transferred outside the territory from where it was collected, we will implement appropriate legal mechanisms to ensure that your Personal Data remains adequately protected upon reaching its destination, as required by applicable laws including UK GDPR, DPA and/or POPIA as applicable.

10.2. Information you provide to us is stored on our secure servers in the United Kingdom and may be transferred to servers in the EU (in respect of which the UK has granted the EU data privacy adequacy, meaning personal data can flow freely between the UK and EU, as the EU's data protection regime is considered essentially equivalent to the UK GDPR). In addition, we carry out certain of our operations with assistance from a wholly-owned subsidiary, Lalu SA (Pty) Ltd (a company incorporated in the Republic South Africa with company number 2024/151466/07 and having its registered address at 8 Church Street, Durbanville, 7550, South Africa).

10.3. We have a Data Sharing Agreement with Lalu SA (Pty) Ltd that includes Standard Contractual Clauses under the UK Information Commissioner's Office International Data Transfer Agreement for the transfer of personal data from the UK and the agreement also requires that Lalu SA will only process Personal Data in support of our business. The agreement similarly protects information transfers from the RSA.

10.4. Your personal data that is accessible to Lalu SA (Pty) Ltd will be held on servers in the UK and EU (as referred to in Clause 10.2) that may be remotely accessed from South Africa for the purposes of assisting in the operations of our business. Such access constitutes a transfer of your data for the purposes of UK GDPR and the DPA. We ensure that such information is not otherwise transferred from the UK or EU or further transferred from South Africa other than back to the UK or EU or as required or permitted by law. We ensure that your personal data in South Africa is not processed save as permitted by law.

11. Information about other individuals

If you give us information on behalf of a third party, you confirm that the third party has appointed you to act on his/her/their behalf and has agreed that you can: give Consent on his/her/their behalf to the processing of his/her/their Information; receive on his/her/their behalf any data protection notices.

12. Your rights and duty to inform us of changes

You have a number of rights under data protection law. Full information on your rights under UK GDPR and the DPA can be found on the UK Information Commissioner's website at <https://ico.org.uk> and information on rights under POPIA can be found on the RSA Information Regulator's website <https://inforegulator.org.za>

These include the right to be informed about the collection and use of your personal data, for example by this Policy. This section sets out your further, specific legal rights in respect of any of your Personal Data that we are holding and/or processing.

If you wish to exercise any of your legal rights, you should put your request in writing to the applicable Data Controller where this is not us or Lalu SA or otherwise to us (using our contact details in clause 19 below) giving us enough information to identify you and respond to your request. We may require you to supply evidence of your identity and other information we need to deal with your request. In the majority of cases, we will respond within one month of receiving the necessary information to deal with your request.

12.1. You have the right to request access to information about Personal Data that we may hold and/or process about you (commonly known as a "data subject access request"), including: whether or not we are holding and/or processing your Personal Data; the extent of the Personal Data we are holding; and the purposes and extent of the processing.

12.2. You have the right to have any inaccurate or incomplete information we hold about you be corrected and/or updated. If any of the Information that you have provided changes, or if you become aware of any inaccuracies in such Information, please let us know in writing giving us enough information to deal with the change or correction. It is important that the Information we hold about you is accurate and current. Please keep us informed if your Information changes during our relationship with you.

12.3. You have the right in certain circumstances to request that we delete all Personal Data we hold about you (the 'right of erasure'). Please note that this right of erasure is not available in all circumstances, for example where we need to retain the Personal Data for legal compliance or contractual purposes. If this is the case, we will let you know.

12.4. You have the right in certain circumstances to request that we restrict the processing of your Personal Data, for example where the Personal Data is inaccurate or where you have objected to the processing (see clause 12.6 below).

12.5. You have the right to request a copy of the Personal Data we hold about you and to have it provided in a structured format suitable for you to be able to transfer it to a different Data Controller (the 'right to data portability'). Please note that the right to data portability is only available in some circumstances, for example where the processing is carried out by automated means. If you request the right to data portability and it is not available to you, we will let you know.

12.6. You have the right in certain circumstances to object to the processing of your Personal Data. If so, we shall stop processing your Personal Data unless we can demonstrate sufficient and compelling legitimate grounds for continuing the processing which override your own interests. If, as a result of your circumstances, you do not have the right to object to such processing then we will let you know.

12.7. You have the right in certain circumstances not to be subject to a decision based solely on automated processing, for example where a computer algorithm (rather than a person) makes decisions which affect your contractual rights. Please note that this right is not available in all circumstances. If you request this right and it is not available to you, we will let you know.

12.8. You have the right to object to direct marketing, for which see clause 7.5 above. If you have a concern that is not resolved through correspondence and/or discussions with us, you can raise your concern with the Information Commissioner's Office (see clause 14.2 below).

13. Accessing personal data

13.1. You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights in clause 12). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive.

13.2. We may need to request specific information from you to help us to confirm your identity to ensure your right to access your Personal Data. This is a security measure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

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

14. Complaints

14.1. If you have any concerns about how we collect or process your Information please contact us through dpo@lalu.co.uk

14.2. However, if you do not feel we have handled your concern then you have the right to lodge a complaint with a supervisory authority, which for the UK is the UK Information Commissioner's Office ("ICO"). Complaints can be submitted to the ICO through the ICO helpline by calling 0303 123 1113. Further information about reporting concerns to the ICO is available at <https://ico.org.uk/concerns/>. For the RSA this can be submitted to the Information Regulator using the information available at <https://inforegulator.org.za/complaints/>.

15. 'Cookies' and related software

15.1. Our software may issue 'cookies' (small text files) to your device when you access and use the Website or the Application. Cookies do not affect your privacy and security since a cookie cannot read data off your system or read cookie files created by other sites.

15.2. Our Website and Application use cookies and other tracking and monitoring software to: distinguish our users from one another; collect standard Internet log information; and to collect visitor behaviour information. The information is used to track user interactions with the Website and the Application and allows us to provide you with a good experience when you access the Website or the Application, helps us to improve our Website, Application and

Services, and allows us to compile statistical reports on visitors and activity of the Website and Application.

15.3. You can set your system not to accept cookies if you wish (for example by changing your browser settings so cookies are not accepted), however please note that some of our Website or Application features may not function if you remove cookies from your system. For further general information about cookies please visit www.aboutcookies.org or www.allaboutcookies.org

16. Changes to this Policy

We keep this Policy under regular review and may change it from time to time. If we change this Policy we will post the changes on this page, and where appropriate when you next start the Application, so that you may be aware of the Information we collect and how we use it at all times. You are responsible for ensuring that you are aware of the most recent version of this Policy as it will apply each time you access the Website or the Application.

17. Links to other websites

17.1. Our Website or Application may contain links to other websites. This Policy only applies to our Website and our Application. If you access links to other websites any Information you provide to them will be subject to the privacy policies of those other websites.

17.2. We have no control over third party websites or systems and accept no legal responsibility for any content, material or information contained in them. Your use of third-party sites or systems will be governed by the terms and conditions of that third party. It is your responsibility to ensure you are happy with such third-party terms and conditions.

17.3. The display of any hyperlink and/or reference to any third-party website, system, product or service does not mean that we endorse that third party's website, products or services and any reliance you place on such hyperlink, reference or advert is done at your own risk.

18. Accessibility

This Policy aims to provide you with all relevant details about how we process your Information in a concise, transparent, intelligible and easily accessible form, using clear and plain language. If you have any difficulty in reading or understanding this Policy, or if you would like this Policy in another format (for example audio, large print or braille), please get in touch with us.

19. Contact us

We welcome your feedback and questions on this Policy. If you wish to contact us, please email us at dpo@lalu.co.uk or call 03333 055 774 or write to us at the applicable address set out in clause 2.