
PRIVACY POLICY

Privacy Policy

1. This privacy policy sets out how Life4Cuts JS Limited uses and protects your personal data. It sets out the conditions under which we may process any information that we collect from you, or that you provide to us, including data obtained via our website as well as when purchasing, interacting with or otherwise using our services at one of our photo booths. It covers information that could identify you personally (“**personal data**”) as well as information that could not.
2. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us using the information set out in the [Contacting us](#) section below.
3. **Please note that our photo booths, our website and our services are not intended for persons under the age of 13 years, and we do not knowingly collect data relating to children.**

Who we are

4. In this document, “**the company**”, “**we**”, “**our**”, and “**us**” refer to Life4Cuts JS Limited. Our registered office is on 14th Floor, 2, Apex Tower, Surrey, KT3 4DQ, United Kingdom.

Personal data we collect

5. We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- (a) **Image Data.** This includes any image(s) we take of you when using our photo booths and includes both photographs and video.
 - (b) **Identity Data.** This includes your first name, last name, title and similar identifiers, which may include technological identifiers such as cookies.
 - (c) **Contact Data.** This includes your address, email address and telephone numbers.
 - (d) **Financial Data.** This includes debit and credit card details.
 - (e) **Transaction Data.** This includes details about payments to and from you and other details of products and services you have purchased from us.
 - (f) **Technical Data.** This includes internet protocol (IP) address, device type, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device ID and other technology on the devices you use to access our website and our services.
 - (g) **Usage Data.** This includes information about how you interact with and use our photo booths, website, products and services.
6. We also collect, use and share aggregated data such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals' Usage Data to calculate the percentage of users accessing a specific website feature in order to analyse general trends in how users are interacting with our website to help improve the website and our service offering.
7. We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

How your personal data is collected

8. We use different methods to collect data from and about you including through:
- (a) **Your interactions with us.** You may give us your personal data when using our photo booths, for example by participating in being photographed or recorded, as well when you complete an online form on our website, correspond with us by post, phone email or otherwise, and when interacting with us on social media.
 - (b) **Automated technologies or interactions.** As you interact with our website and with our photo booths, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our [Cookie Policy](#) for further details.
 - (c) **Third parties.** We will receive personal data about you from various third parties, those being:
 - (i) LK VENTURES SEOUL HEADQUARTERS which provides technical services to us for the purposes of operating our photo booths, including photo and video recording services.
 - (ii) Nayax UK Limited which provides payment services to us, so that we may receive your payments for our products and services and facilitate any refunds or other payments required.

How we use your personal data

9. The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:
- (a) **Performance of a contract with you.** Where we need to perform the contract we are about to enter into or have entered into with you.

- (b) **Legitimate interests.** We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud, to enable us to give you the best and most secure customer experience, for record-keeping purposes for the proper and necessary administration of our business, to protect and assert the legal rights of any party, to obtain professional advice we require to manage our business, and to protect your interests where we believe we must do so. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- (c) **Legal obligation.** We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.
- (d) **Consent.** We rely on consent only where we have obtained your agreement to use your personal data for a specified purpose, for example if you participate in being photographed or recorded using one of our photo booths, or when you subscribe to an email newsletter of ours or request information from us by email.
10. We have set out below, in a table format, a description of all the ways we plan to use the various categories of your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/Use	Type of data	Legal basis and retention period
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<p>To photograph you</p>	<p>Image Data</p>	<p>Performance of a contract with you</p> <p>Consent</p> <p><i>Image Data is deleted automatically 3 days after it is obtained.</i></p>
<p>To process your photography order, including digital delivery of your photographs to you, managing payments, fees and charges, and collecting and recovering money owed to us</p>	<p>Image Data Identity Data Financial Data Transaction Data</p>	<p>Performance of a contract with you</p> <p>Necessary for our legitimate interests (to recover debts due to us)</p> <p><i>Image data is deleted automatically 3 days after it is obtained; however, we may retain other data we process on the basis of our legitimate interests for up to 3 months.</i></p>
<p>To manage our relationship with you, including dealing with your requests, or any complaints or queries</p>	<p>Image Data Identity Data Contact Data Financial Data Transaction Data Technical Data Usage Data</p>	<p>Performance of a contract with you</p> <p>Necessary to comply with a legal obligation</p> <p>Necessary for our legitimate interests (to keep our records updated and manage our relationship with you)</p> <p><i>Image data is deleted automatically 3 days after it is obtained; however, we may retain other data we process on the basis of our legitimate interests for up to 3 months.</i></p>

<p>To administer and protect our business, our photo booths, and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>Image Data Identity Data Contact Data Financial Data Transaction Data Technical Data Usage Data</p>	<p>Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p><i>Image data is deleted automatically 3 days after it is obtained; however, we may retain other data we process on the basis of our legitimate interests for up to 3 months.</i></p>
<p>To improve our photo booths, website, products/services, customer relationships and experiences and to measure the effectiveness of our communications and marketing through analysis of data analytics</p>	<p>Technical Data Usage Data</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p> <p><i>We may retain data we process on the basis of our legitimate interests for up to 3 months.</i></p>
<p>To market our products and services to you on third party websites using remarketing or retargeting services</p>	<p>Identity Data (limited to a unique identifier which allows your previous visits to our website to be recognised by means of a cookie) Technical Data Usage Data</p>	<p>Consent</p> <p><i>You may withdraw your consent to our use of your data in this way at any time by deleting all cookies stored by your web browser when using our website. See the website https://allaboutcookies.org/how-to-clear-cookies for information about how to clear cookies from your computer. You will need to do so on all devices you access our website or services from.</i></p>

Disclosures of your personal data

11. We may share your personal data where necessary with the parties set out below for the purposes set out in the table detailing *How we use your personal data* in paragraph 10 above.
- (a) Amazon Web Services Korea LLC which provide our web hosting services. The company address of Amazon Web Services Korea LLC is 231, Teheran-ro, Gangnam-gu, Seoul, Republic of Korea. Their privacy policy is available online at https://aws.amazon.com/compliance/eu-data-protection/?nc1=h_ls.
 - (b) Nayax UK Limited which processes payments, refunds and related financial transactions on our behalf. The company address of Nayax UK Limited is The Maylands Building, Maylands Avenue, Hemel Hempstead, HP2 7TG. Their privacy policy is available online at <https://www.nayax.com/legal/dpa-for-nayax-customers/>
 - (c) Credit reference agencies which assist us in combating fraud including by investigating suspicious transactions as well as situations where card payments for our services are cancelled without notice to us.
 - (d) LK VENTURES SEOUL HEADQUARTERS, which provides technical services to us for the purposes of operating our photo booths, including photo and video recording services, as well as image servers which store the Image Data referred to in the *Personal data we collect* section in paragraph 5 above. The company address of LK VENTURES SEOUL HEADQUARTERS is 27, Teheran-ro 2-gil, Gangnam-gu, Seoul, Republic of Korea.
 - (e) Other third parties that may need to be involved in investigating any complaint you raise regarding our products and services.
 - (f) Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or

merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

12. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes, and we only permit them to process your personal data for specified purposes and in accordance with our instructions.

International transfers

13. We may transfer your personal data to service providers that carry out certain functions on our behalf. This may involve transferring personal data outside the UK to countries which have laws that do not have the same data protection laws or provide the same level of data protection as the UK law.
14. However, we will only transfer your personal data outside of the UK to countries that have been deemed by the UK to provide an adequate level of protection for personal data. These include:
 - (a) countries within the European Economic Area (the EEA) under Part 1 of Schedule 21 of the Data Protection Act 2018; and
 - (b) the Republic of Korea (also known as South Korea) under The Data Protection (Adequacy) (Republic of Korea) Regulations 2022 (SI 2022/1213).

Data security

15. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

How long we use your personal data for

17. Details of retention periods for different aspects of your personal data are set out in the table detailing *How we use your personal data* in paragraph 10 above.

Your legal rights

18. You have a number of rights under data protection laws in relation to your personal data.
19. You have the right to:
- (a) Request access to your personal data (commonly known as a “subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
 - (b) Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
 - (c) Request erasure of your personal data in certain circumstances. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- (d) Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.
- (e) You also have the absolute right to object any time to the processing of your personal data for direct marketing purposes.
- (f) Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- (g) Withdraw consent at any time where we are relying on consent to process your personal data (see the table detailing *How we use your personal data* in paragraph 10 above for details of when we rely on your consent as the legal basis for using your data). However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. Where it is reasonably possible for us to do so, we will advise you if this is the case at the time you withdraw your consent.
- (h) Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:
 - (i) If you want us to establish the data's accuracy;
 - (ii) Where our use of the data is unlawful but you do not want us to erase it;
 - (iii) Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or

(iv) You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

20. If you wish to exercise any of the rights set out above, please contact us by emailing info@life4cuts.co.uk.

No fee usually required

21. You will not have to pay a fee to access your personal data (or to exercise any of the other rights listed). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

22. 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 you for further information in relation to your request to speed up our response.

Time limit to respond

23. 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.

Contacting us

24. If you have any questions about this privacy policy or about the use of your personal data or you want to exercise your privacy rights, please contact us in the following ways:

Email address: info@life4cuts.co.uk.

Postal address: Life4Cuts Limited, 14th Floor, 2, Apex Tower, Surrey, KT3 4DQ, United Kingdom.

Complaints

25. If you are in any way dissatisfied with how we process your personal information, you have a right to complain to the Information Commissioner's Office ("ICO"), the UK regulator for data protection issues. This can be done at <https://ico.org.uk/concerns/>
26. We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance by email to info@life4cuts.co.uk.

Changes to this policy

27. We keep our privacy policy under regular review.
28. This policy may change and if it does, these changes will be posted on this page and displayed on-screen at our photo booths and you may be required to read and accept the updated privacy policy to continue your use of our photo booths and services.
29. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during our relationship with you.

Third-party links

30. Our sites and services may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. Please note that these websites and any services that may be accessible through them have their own privacy policies and that we do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites or services, such as Contact Data and

location data. Please check these policies before you submit any personal data to these websites or use these services.

