

## PRIVACY POLICY

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and our information practices, meaning how and why we collect, use, disclose, sell, share, store, and retain your personal information. It also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event you have a complaint or request.

We collect, use, and are responsible for certain personal information about you. When we offer goods and services to individuals in the European Economic Area (EEA), we are subject to the EU General Data Protection Regulation (EU GDPR), which applies across the entire European Union. For California consumers, we are subject to the California Consumer Privacy Act of 2018 (CCPA), as amended by the California Privacy Rights Act of 2020 (CPRA). We are responsible as a “controller” of that personal information for the purposes of the GDPR. We are responsible for your personal information as a “business” under the CCPA/CPRA.

### 1. Key Terms. It would be helpful to start by explaining some key terms used in this policy:

We, us, our	<b>8ACK.COM LTD (“Back.tech”)</b> Company number <b>15760360</b> Registered office address <b>First Floor, 129 High Street, Guildford, United Kingdom, GU1 3AA</b> Incorporated on <b>4 June 2024</b>
Our representative	Dhiren Bathija Dhiren@back.tech
Personal information	Any information relating to an identified or identifiable individual
Special category personal information	Personal information revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs, or trade union membership; genetic and biometric data; and data concerning health, sex life or sexual orientation.
Sensitive Personal Information	Personal information revealing a consumer's social security number, driver's license and passport numbers, account numbers and credentials, precise geolocation, racial or ethnic origin, religious beliefs, or union membership, personal information concerning a consumer's health, sex life, or sexual orientation, contents of a consumer's mail, email and text messages where the business is not the intended recipient, genetic data, biometric information, or citizenship and immigration status

Biometric Information	An individual's physiological, biological, or behavioral characteristics, including information about an individual's deoxyribonucleic acid (DNA), that is used or is intended to be used singly or with each other or with other identifying data, to establish individual identity. Biometric information includes, but is not limited to, imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template, such as a faceprint, a minutiae template, or a voiceprint, can be extracted, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contain identifying information
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- 2. Personal Information We Collect About You.** We may collect and use the following personal information, including sensitive personal information, that identifies, relates to, describes, is reasonable capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. When processing end consumer data, we receive this information from retailers who act as the data controllers and instruct us to process such data on their behalf.

Categories of Personal Information	Specific Types of Personal Information Collected
Identifiers (e.g., a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers)	We collect customer name, email address, mobile number, postal/delivery address, order history (order IDs, product details, delivery status), and payment-related information (mode, currency, amount, discounts, etc.).
Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, their name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information	We collect customer details such as name, email, phone number, delivery address, order and payment information, along with browser and device data (including IP address, location, browser type, operating system, language, screen details, and browser details).

Account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account	<p>We collect limited financial transaction details such as payment mode, amount, currency, and payment status for the specific orders/ purchases</p> <p>This information is given to us by our client (retailer).</p> <p>However, we do not collect or store sensitive payment information such as full debit/credit card numbers, bank account details, or associated security/access codes. All such sensitive data is securely handled by third-party payment gateway providers (e.g., Stripe).</p> <p>For customer access, we do not provide traditional account logins. Instead, customers may access their order information using their order number and delivery ZIP code. We do, however, maintain login credentials (email address and password) for our internal administrative users to access the admin panel.</p>
Commercial information (e.g., records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies)	We collect commercial information such as order details, products purchased, order history, payment information (mode, currency, amount, discounts), delivery details, and customer classification (e.g., Good, Bad, or VIP). However, this information is given to us by the client (retailer) and this is stored in our systems.
Internet or other electronic network activity information (e.g., browsing history, search history, and information regarding a consumer's interaction with an internet website, application, or advertisement)	We collect internet and electronic network activity information such as IP address, browser type, operating system, device details (screen size, CPU cores, language, time zone), user agent, browser details, and location data associated with the customer's interaction with our website or application. This information is collected to classify user behavior and to help detect, prevent, and investigate fraudulent activity.
Geolocation data	We collect geolocation data, including device location coordinates and derived location details, primarily to verify customer activity, classify user behavior, and detect or prevent fraudulent transactions.

Inferences drawn from any of the information identified above to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes	We generate limited inferences from collected data, such as customer classification (e.g., Good, Bad, or VIP), lifetime value, order history, and behavioral patterns. These inferences are used primarily for fraud detection, risk assessment, and improving customer experience.
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If you do not provide personal information required to provide products AND/OR services to you, it may delay or prevent us from providing products AND/OR services to you.

**3. How Your Personal Information is Collected.** We collect personal information from the following categories of sources:

- Browser and device details – such as technical information automatically provided when you access our website.
- Directly from our website – including information you provide when interacting with our site.
- From our clients (retailers) – who, as data controllers, share end consumer order data with us so we can provide the Services under their instructions.

**4. How and Why We Use Your Personal Information.** When processing end consumer data on behalf of a retailer, we do so solely under that retailer's instructions and legal basis. The retailer remains responsible for determining the purposes and lawful grounds of such processing. Under data protection laws, we can only use your personal information if we have a proper reason for doing so, for example:

- To comply with our legal and regulatory obligations
- For the performance of our contract with you or to take steps at your request before entering into a contract
- For our legitimate interests or those of a third party –or–
- Where you have given consent (i.e. explicit consent given for use of your photographs and or images in order for us to provide our services)

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal information for and our reasons for doing so:

What we use your personal information for	Our reasons
To provide products AND/OR services to you	For the performance of our contract with you or to take steps at your request before entering into a contract
To prevent and detect fraud against you or Back.Tech	For our legitimate interests or those of a third party, i.e., to minimize fraud that could be damaging for us and for you

Operational reasons, such as improving efficiency, training, and quality control	For our legitimate interests or those of a third party, i.e., to be as efficient as we can so we can deliver the best service for you at the best price
Updating and enhancing customer records	<p>For the performance of our contract with you or to take steps at your request before entering into a contract</p> <p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests or those of a third party, e.g., making sure that we can keep in touch with our customers about existing orders and new products</p>
Ensuring safe working practices, staff administration and assessments	For our legitimate interests or those of a third party, e.g., to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you
<p>Marketing our services and those of selected third parties to:</p> <ul style="list-style-type: none"> <li>Existing and former customers</li> <li>Third parties who have previously expressed an interest in our services</li> <li>Third parties with whom we have had no previous dealings</li> </ul>	For our legitimate interests or those of a third party, i.e., to promote our business to existing and former customers

Further to the above, from time to time, we test improvements to our clients. Some aspects of our Services involve automated processing of end consumer data to support fraud detection and returns eligibility decisions. For example, Back.tech analyses historical return patterns, order data, and behavioural indicators to generate a “return score.” This score may influence whether a return is automatically approved, held for manual review, or excluded from instant refund options.

These automated assessments help retailers identify potential misuse and maintain fair returns policies. However, no automated decision by Back.tech alone produces legal effects or similarly significant consequences without the retailer’s involvement or opportunity for review.

End consumers have the right to request human review of any decision that has been made solely by automated means, to express their point of view, or to contest the decision. Retailers are responsible for communicating these rights to their customers, and Back.tech will assist retailers in honouring such requests where applicable.

- 5. EEA Data Subjects: Promotional Communications.** We may use your personal information to send you updates (by email, text message, telephone, or post) about our products AND/OR services, including exclusive offers, promotions or new products AND/OR services.

We have a legitimate interest in processing your personal information for promotional purposes (see above “How and why we use your personal information”). This means we do not usually need your

consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

We will always treat your personal information with the utmost respect and never sell it with other organizations for marketing purposes.

You have the right to opt-out of receiving promotional communications at any time by:

- Contacting us
- Using the “unsubscribe” link in emails or “STOP” number in texts or
- We may ask you to confirm or update your marketing preferences if you instruct us to provide further products AND/OR services in the future, or if there are changes in the law, regulation, or the structure of our business.

**6. Who We Share Your Personal Information With.** When we process end consumer data on behalf of a retailer, we share such data only with authorised sub-processors and service providers engaged to support the Services, in accordance with our Data Processing Addendum and the retailer’s written instructions. We routinely share personal information with:

- Our affiliates
- Service providers we use to help deliver our [products and/or services] to you, such as payment service providers, warehouses, and delivery companies
- Other third parties we use to help us run our business, such as marketing agencies, banks or website hosts
- We only allow our service providers to handle your personal information if we are satisfied they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers relating to ensure they can only use your personal information to provide services to us and to you. We may also share personal information with external auditors, e.g., in relation to the audit of our accounts.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a re-structuring. We will typically anonymize information, but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

**7. Categories of Personal Information We May Disclose for a Business Purpose.**

- Identifiers (e.g., a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers)
- Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, their name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information
- Characteristics of protected classifications under California or federal law
- Commercial information (e.g., records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies)

- Biometric information
- Internet or other electronic network activity information (e.g., browsing history, search history, and information regarding a consumer's interaction with an internet website, application, or advertisement)
- Geolocation data
- Audio, electronic, visual, thermal, olfactory, or similar information
- Professional or employment-related information
- Education information, defined as information that is not publicly available personally identifiable information as defined in the FERPA
- Inferences drawn from any of the information identified above to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes –and–
- Sensitive personal information

**8. How Long Your Personal Information Will Be Kept.** We will keep your personal information while you have an account with us or while we are providing products AND/OR services to you. Thereafter, we will keep your personal information for as long as is necessary:

- To respond to any questions, complaints or claims made by you or on your behalf
- To show that we treated you fairly –or–
- To keep records required by law

We will not retain your personal information for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of personal information

**9. California Consumers: Your Rights Under the CCPA/CPRA.** You have the right under the California Consumer Privacy Act of 2018 (CCPA), as amended by the California Privacy Rights Act of 2020 (CPRA), and certain other privacy and data protection laws, as applicable, to exercise free of charge:

<p>Disclosure of Personal Information We Collect About You</p>	<p>You have the right to know, and request disclosure of:</p> <ul style="list-style-type: none"> <li>• The categories of personal information we have collected about you, including sensitive personal information</li> <li>• The categories of sources from which the personal information is collected</li> <li>• The categories of third parties to whom we disclose personal information, if any –and–</li> <li>• The specific pieces of personal information we have collected about you</li> </ul> <p>Please note that we are not required to:</p> <ul style="list-style-type: none"> <li>• Retain any personal information about you that was collected for a single one-time</li> </ul>
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	<p>transaction if, in the ordinary course of business, that information about you is not retained</p> <ul style="list-style-type: none"> <li>• Reidentify or otherwise link any data that, in the ordinary course of business, is not maintained in a manner that would be considered personal information –or–</li> <li>• Provide the personal information to you more than twice in a 12-month period</li> </ul>
Disclosure of Personal Information Shared for a Business Purpose	<p>In connection with any personal information we may sell, share, or disclose to a third party for a business purpose, you have the right to know:</p> <ul style="list-style-type: none"> <li>• The categories of personal information about you that we sold or shared and the categories of third parties to whom the personal information was sold or shared – and–</li> <li>• The categories of personal information that we disclosed about you for a business purpose and the categories of persons to whom the personal information was disclosed for a business purpose</li> </ul> <p>You have the right to opt-out of the sale of your personal information or sharing of your personal information for the purpose of targeted behavioral advertising. If you exercise your right to opt-out of the sale or sharing of your personal information, we will refrain from selling or sharing your personal information, unless you subsequently provide express authorization for the sale or sharing of your personal information.</p>
Right to Limit Use of Sensitive Personal Information	<p>You have the right to limit the use and disclosure of your sensitive personal information to the use which is necessary to:</p> <ul style="list-style-type: none"> <li>• Perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services</li> <li>• To perform the following services: (1) Helping to ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for these purposes; (2) Short-term, transient use,</li> </ul>



	<p>including, but not limited to, non-personalized advertising shown as part of a consumer's current interaction with the business, if the consumer's personal information is not disclosed to another third party and is not used to build a profile about the consumer or otherwise alter the consumer's experience outside the current interaction with the business; (3) Performing services on behalf of the business, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on behalf of the business; and (4) Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by the business, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by the business –and–</p> <ul style="list-style-type: none"> <li>• As authorized by further regulations</li> </ul> <p>You have a right to know if your sensitive personal information may be used, or disclosed to a service provider or contractor, for additional, specified purposes.</p>
Right to Deletion	<p>Subject to certain exceptions set out below, on receipt of a verifiable request from you, we will:</p> <ul style="list-style-type: none"> <li>• Delete your personal information from our records –and–</li> <li>• Delete your personal information from our records –and–</li> <li>• Direct third parties to whom the business has sold or shared your personal information to delete your personal information unless this proves impossible or involves disproportionate effort</li> </ul> <p>Please note that we may not delete your personal information if it is reasonably necessary to:</p> <ul style="list-style-type: none"> <li>• Complete the transaction for which the personal information was collected, fulfill</li> </ul>

	<p>the terms of a written warranty or product recall conducted in accordance with federal law, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between you and us</p> <ul style="list-style-type: none"> <li>• Help to ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for those purposes</li> <li>• Debug to identify and repair errors that impair existing intended functionality</li> <li>• Exercise free speech, ensure the right of another consumer to exercise their right of free speech, or exercise another right provided for by law</li> <li>• Comply with the California Electronic Communications Privacy Act</li> <li>• Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when our deletion of the information is likely to render impossible or seriously impair the achievement of such research, provided we have obtained your informed consent</li> <li>• Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us</li> <li>• Comply with an existing legal obligation – or–</li> <li>• Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information</li> </ul>
Right of Correction	<p>If we maintain inaccurate personal information about you, you have the right to request us to correct that inaccurate personal information. Upon receipt of a verifiable request from you, we will use commercially reasonable efforts to correct the inaccurate personal information.</p>
Protection Against Retaliation	<p>You have the right to not be retaliated against by us because you exercised any of your rights under the</p>

	<p>CCPA/CPRA. This means we cannot, among other things:</p> <ul style="list-style-type: none"> <li>• Deny goods or services to you</li> <li>• Charge different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties</li> <li>• Provide a different level or quality of goods or services to you –or–</li> <li>• Suggest that you will receive a different price or rate for goods or services or a different level or quality of goods or services</li> </ul> <p>Please note that we may charge a different price or rate or provide a different level or quality of [goods and/or services] to you, if that difference is reasonably related to the value provided to our business by your personal information. We may also offer loyalty, rewards, premium features, discounts, or club card programs consistent with these rights or payments as compensation, for the collection of personal information, the sale of personal information, or the retention of personal information.</p>
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#### 10. EEA Data Subjects: Your Rights Under the EU GDPR.

Right to Be Informed	The right to know or be notified about the collection and use of your personal information
Right to Access	The right to be provided with a copy of your personal information (the right of access)
Right to Rectification	The right to require us to correct any mistakes in your personal information
Right to be Forgotten	The right to require us to delete your personal information—in certain situations
Right to Restriction of Processing	The right to require us to restrict processing of your personal information—in certain circumstances, e.g., if you contest the accuracy of the data
Right to Data Portability	The right to receive the personal information you provided to us, in a structured, commonly used,

	and machine-readable format and/or transmit that data to a third party—in certain situations
Right to Object	<p>The right to object:</p> <ul style="list-style-type: none"> <li>• At any time to your personal information being processed for direct marketing (including profiling)</li> <li>• In certain other situations to our continued processing of your personal information, e.g., processing carried out for our legitimate interests</li> </ul>
Right Not to be Subject to Automated Individual Decision-Making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on each of those rights, including the circumstances in which they apply, see the guidance from the UK Information Commissioner's Office (ICO) on individual rights under the EU General Data Protection Regulation.

**11. How to Exercise Your Rights.** If you would like to exercise any of your rights as described in this Privacy Policy, you can do so by writing to us via the email address as listed under contact information and/or filling out the necessary information as required per our access request form, [located here](#).

- Please note that you may only make a CCPA/CPRA-related data access or data portability disclosure request twice within a 12-month period.
- If you choose to contact us directly by website/email/in writing, you will need to provide us with:
  - Enough information to identify your Proof of your identity and address –and–
  - A description of what right you want to exercise and the information to which your request relates
- We are not obligated to make a data access or data portability disclosure if we cannot verify that the person making the request is the person about whom we collected information or is someone authorized to act on such person's behalf.
- Any personal information we collect from you to verify your identity in connection with your request will be used solely for the purposes of verification.

**12. EEA Data Subjects: Where Your Personal Information is Held.** Information may be held at our offices, third-party agencies, service providers, representatives and agents as described above (see above: “Who We Share Your Personal Information with”).

Some of these third parties may be based outside the EEA. For more information, including on how we safeguard your personal information when this occurs, see below: “Transferring Your Personal Information Out of the EEA.”

**13. EEA Data Subjects: Transferring Your Personal Information Out of the EEA.** To deliver services to you, it is sometimes necessary for us to share your personal information outside the EEA, e.g.:

- With your and our service providers located outside the EEA
- If you are based outside the EEA –or–
- If you would like further information, please contact us (see “How To Contact Us” below).

**14. Keeping Your Personal Information Secure.** We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorized way. These same measures apply to all end consumer data we process on behalf of retailers, and we ensure equivalent safeguards are applied by any authorised sub-processors. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorized manner and are subject to a duty of confidentiality. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

**15. EEA Data Subjects: How to File a GDPR Complaint.** We hope that we can resolve any query or concern you raise about our use of your information.

**16. Changes to This Privacy Notice.** This privacy notice was published on 23/10/25 and last updated on 23/10/25. We may change this privacy notice from time to time.

**17. How to Contact Us.** Please contact us by post, email if you have any questions about this privacy policy or the information we hold about you.

Our contact details are shown below:

First Floor, 129 High Street, Guildford, United Kingdom, GU1 3AA	First Floor, 129 High Street, Guildford, United Kingdom, GU1 3AA
Support@Back.Tech	Dhiren@Back.Tech