

Privacy Notice – KINDRED GROUP (the "Company")

What is a privacy notice?

We want to ensure you understand what information we collect about you, how we will use it and for what purpose.

We are also required by data protection legislation to explain certain matters to you.

What personal data do we collect about you?

Upon joining the Affiliate Program via the sign-up form here <https://www.kindredaffiliates.com/join/>, we will collect, store and process personal information about you that you provided, this can include your:

- Sign-up data: name, affiliate/company name, e-mail address, contact number, skype name, postal address, website address, payment details, username and password;
- Payment information: Payee name, payment method, e-mail address for the chosen payment method or bank name, postal address, account number, bank code, IBAN code and BIC/ABA/Swift code;

How and why will we use your personal data?

As you will appreciate, we need to use your personal information to process your application, determine your suitability as an Affiliate and to carry out an ongoing business relationship with you.

In most cases, we will use your personal information to comply with our legal obligations, to take steps towards entering into a contract with you, or to further the Company's legitimate business interests.

The situations in which we will commonly use your personal information include:

- Managing the Affiliate Program (i.e. contacting you for any queries we may have or keeping you informed of changes to the program or our brands);
- Processing commission payments;
- Verifying your identity or that of the directors of the company, details of which were provided by you upon sign up.

We are guided by the principle that you should not be surprised by any use we make of your personal information.

What happens if you do not provide personal information?

You are required by law to provide certain personal information to us, for example to enable us to verify your identity. If you fail to provide certain personal information when requested, we will not be able to continue with your application and in some cases (i.e. should you refuse to provide us with the necessary information to verify the identity of yourself or the directors of the company to which the affiliate account belongs) your affiliate account may have to be closed.

Who else might your personal data be shared with?

We work with a third-party software supplier, NetRefer (the "Technical Platform"), who are the Data Processor of your data relating to your affiliate account.

NetRefer monitors compliance with its data protection policies and procedures and has procedures to address privacy-related complaints and disputes. In this regard, individuals may address their data protection related concerns by contacting NetRefer's Data Protection officer at dpo@netrefer.com or +356 2767 3337.

NetRefer shall respond to all inquiries, concerns and/or complaints about its personal information handling practices.

The regulatory body in Malta responsible for the handling of personal information is the Office of the Information and Data Protection Commissioner. For more information, please visit <https://idpc.org.mt/en/Pages/Home.aspx>

Every privacy-related complaint will be acknowledged, recorded and investigated, and the results of the investigation will be provided. If a complaint is found to be justified, appropriate measures will be taken including, if necessary, amending our privacy policies and procedures.

Your personal data will not be stored and processed outside of the European Economic Area (EEA), in countries that may have different data protection rules to our own. The Company will not transfer your personal information outside of the EEA.

How long do we keep your personal data?

When your application is successful, your personal information may be retained.

- Inactive Affiliates: your information will be retained for up to 1 year and archived for up to 6 years; we will ask you if you would like us to retain your personal information or not;
- Active Affiliates: your information will be retained for the lifetime of the Affiliate

How do we keep your personal data secure?

We ensure the security of your personal data:

- Security layers and methodologies applied at infrastructure layer:

Network Edge Traffic Monitoring & Mitigation – PrevenTier & Incapsula
Simulated & Vetted through Penetration Testing

- Comprehensive traffic monitoring
- Multi-layered Approach
- Network-level packet scanning
- Server-level anomaly detection
- Constant Learning Patterns
- Automated Mitigation
- On-Edge Packet Analysis
- DDoS protection
- Load Balancing Mechanisms
- Performance Caching Techniques
- Web Application Firewall

Remote Access Methods

- L2TP/IPSec tunnel VPN protocol
- Data Encrypted in transit
- Access Log (Default Retention Policy – Overwrite)
- Change Log (Default Retention Policy – Overwrite)
- Management Approval

- Security mechanisms for the protection of data access at application layer:

- All authentication communication for all application entry points is handled over secure communication;
- Authorisation is built around a role-based access control extended through a privilege framework;
- All application data is protected adopting the least privilege principle;
- Application level auditing is implemented throughout.

What are your rights in relation to your personal information?

You have certain rights in relation to your personal data, and we have summarised those that are relevant here. For more information on your rights, or if you wish to exercise any of them, please contact us (see the contact details at the bottom of this notice)

Rights	What does this mean?
--------	----------------------

1. The right to be informed	You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we're providing you with the information in this Privacy Notice.
2. The right of access	You have the right to obtain access to your information (if we're processing it), and certain other information (similar to that provided in this Privacy Notice). This is so you're aware and can check that we're using your information in accordance with data protection law.
3. The rights to rectification and erasure	You are entitled to have your information corrected if it's inaccurate or incomplete. In limited circumstances you will have a right to have information erased (known as the right to be forgotten).
4. The right to restrict processing	You have the right to restrict some processing of your personal information, which means that you can ask us to limit what we do with it;
5. The right to object to processing	You have the right to object to certain types of processing, including processing based on our legitimate interests in some cases.
6. The right to lodge a complaint	You are able to submit a complaint to the Information Commissioner's Office about any matter concerning your personal information, using the details below. However, we take our obligations seriously, so if you have any questions or concerns, we would encourage you to raise them with us first, so that we can try to resolve them. Office of the Information and Data Protection Commissioner, Level 2, Airways House, High Street, Sliema SLM 1549, Malta Tel (+356) 2328 7100, www.idpc.org.mt
7. The right to withdraw consent	If you have given your consent to anything we do with your personal data, you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your personal data with your consent up to that point is unlawful).

How will we handle a request to exercise your rights?

We'll respond as soon as we can. Generally, this will be within one month from when we receive your request but, if the request is going to take longer to deal with, we'll come back to you and let you know.

We usually act on requests and provide information free of charge, but may charge a reasonable fee to cover our administrative costs of providing the information for:

- baseless or excessive/repeated requests, or
- further copies of the same information.

Alternatively, the law may allow us to refuse to act on the request.

Questions?

If you have any questions about anything in this privacy notice, please contact Data Protection Officer at DPO.Officer@kindredgroup.com

Our general contact details are affiliates@kindredgroup.com