



ClearLakeBlue Limited ("CLB") is committed to building strong trusting relationships with all our stakeholders. To this end, we ensure collection of personal information is in compliance with laws and regulations and treat, manage, and protect this information as our most valuable asset, in accordance with the disclosure below.

This Privacy Policy (this "Policy") discloses the purposes for which we process personal information and explains regarding our processing of such personal information.

1. Legal Compliance

We recognise the need for, and are fully committed to, ensuring that all officers and employees are fully aware of and comply with laws and regulations regarding the processing of personal information in order to protect personal information we process and ensure its safety.

2. Scope of Application

This Policy applies to all personal information that we process in all countries and regions where we have business operations.

3. Types of Personal Information

We collect and process the following personal information.

1. Contact information: name, telephone number, and email address;
2. Details regarding use of services and details regarding inquiries made; and
3. Any other information you elect to provide directly to us in connection with your use of services we provide.

4. Methods of Acquiring of Personal Information

We collect personal information through the following means:

1. Information provided by individuals: acquired through face-to-face, telephone, mail and e-mail interactions, acquired through the filling out of online forms, and questionnaires; and
2. Information provided by others: acquired through business partners.

Individuals may refuse to provide personal information to us but the decision not to provide certain personal information to us may result in CLB not being able to provide certain information to those individuals.

5. Legal Basis for Processing

CLB's legal basis for processing your personal information will typically be one of the following.

1. Your consent;
2. Necessary for the performance of a contract with you;
3. Necessary for CLB to fulfill its legal obligations;
4. Necessary to protect vital interests; or
5. Required for our legitimate interests or those of a third party, provided that if such interests are overridden by your interests or fundamental rights and freedoms, we will not process your personal information. Our legitimate interests are specified in more detail in Section 6 "Purpose for Processing of Personal Information" below. More information on the balancing test is available upon request.

6. Purpose for Processing of Personal Information

CLB may process your personal information that we collect for the following purposes. If we seek to process your personal information in ways that exceed the scope necessary for achieving these purposes, we will obtain your prior consent to such processing after disclosing information regarding the purpose(s) for which we intend to process it.

1. To deal, in an appropriate manner, with you in any business discussion based on a request for materials, inquiry or application from you, a proposal from CLB to you or otherwise, relating to any kind of business conducted by CLB (for details on CLB Group's business, refer to the section "[Our Services](#)" on our website).
2. To manage any agreement between you and CLB or fulfill obligations of CLB or respond to your exercise of your rights under any agreement or applicable laws and regulations in an appropriate manner. In addition, both before and after expiration of the agreement, to respond to any references to the agreement or when doing so is required for administration in conformance with applicable laws or regulations in an appropriate manner.
3. To support or commission various procedures relating to our provision of products and services (such as financing, registration and administrative procedures).
4. To develop and improve our products and services in order to provide you better products and services.
5. To conduct marketing analysis to improve your satisfaction.
6. To conduct various administrative tasks necessary from a management perspective of CLB.
7. To share with third parties, to the extent necessary to executing a task, such as when the information needs to be provided to allow us to execute our Services.

8. To request advice from specialists (including but not limited to lawyers, certified accountants, tax accountants, or insurance brokers).
9. To execute our operations and incidental and related matters in an appropriate and smooth manner.

7. Protection and Management of Personal Information

CLB has established internal rules and regulations on the protection of personal information and pays the utmost attention to managing personal information appropriately and protecting against leakage of such personal information.

8. Provision of Personal Information to Third Parties

Your personal information may be shared with the following third parties under certain circumstances.

1. Contractors and specialists
In order to support the provision of products and services by CLB or have others provide services on behalf of CLB, [we may share your personal information with other companies, agents and contractors that we use].
2. Business partners, directly managed stores, and franchisees
In order to provide services jointly with other companies or to provide services to you pursuant to a contract, we may share personal information with relevant business partners, directly operated stores and franchised stores.
3. Business successors
We may sell of certain of our businesses to other companies in connection with reorganizations of our overall business. As a consequence of such sales, we may transfer or sell to third parties your personal information that was held in connection with the business sold.

Our website may from time to time contain links to and from websites of our business partners. Please be aware that each of these websites has its own privacy policy and CLB has no control over how each business partner uses personal information. Prior to providing personal information to any of our business partners, please confirm the privacy policy of the relevant third party's website.

9. Your Rights

You can exercise the following rights to the extent permitted by laws and regulations of the country or region in which you reside.

1. Notice of intended use of personal information
You can request we inform you of our intended use for your personal information that we possess. In the event you make such a request, we will respond to the request promptly and appropriately in accordance with applicable laws and regulations.

2. Access to personal information

You have the right to verify whether or not we process personal information about you and, if we process such personal information, you have the right to request access to it. You also have the right to obtain a copy of your personal information that we process. In the event you request we disclose your personal information to you, we will respond to the request promptly and appropriately in accordance with applicable laws and regulations.

3. Correction of personal information

If your personal information is inaccurate or incomplete, you have the right to request that we correct, supplement or otherwise complete such personal information ("Rectify"). In the event you request we Rectify your personal information, we will respond to such request promptly and appropriately in accordance with applicable laws and regulations.

4. Deletion of personal information

You have the right to require us to delete any of your personal information that we process. Provided, however, that we are not obligated to take such action if our retention of such personal information is necessary to comply with our legal obligations or to assert, enforce or defend our legal rights.

5. Restrictions on the processing of personal information

If your personal information processed by CLB is inaccurate, the processing by CLB is illegal or it is no longer necessary for CLB to process the personal information for a particular purpose, you have the right to restrict the processing of your personal information. However, if CLB is unable to delete your personal information due to the need to comply with legal or other obligations or you do not request deletion of your personal information by CLB, we are not obligated to take such action.

6. Data portability

If your personal information is (1) personal information provided to us by you, and (2) we process such personal information based on your consent or in order to perform a contract with you, you have the right to obtain the personal information held by us with respect to you in a structured, commonly used and machine-readable format and the right to transmit such personal information to another controller. You also have the right to have us directly transmit such personal information to another controller, where technically feasible.

7. Withdrawal of consent

If you consent to processing of your personal information, you have the right to withdraw your consent at any time without charge. This includes cases where you wish to stop receiving marketing communications.

8. Complaints

You have the right to file a complaint about the processing of your personal information by us.

If you wish to exercise the right described above, please contact us through the e-mail address listed in Section 12 "Contact Information for Inquiries about Personal Information" of this Policy. In order to respond to your request and protect your privacy and security, we may request you provide information necessary for us to confirm your identity. In cases where we



are unable to confirm your identity based on the information that we receive from you and information in our possession, we may request you provide additional information. We are committed to responding to your request to exercise your rights in accordance with applicable laws and regulations.

If you believe that CLB is not in compliance with applicable laws and regulations on the protection of personal information, you have the right to file a complaint with the competent supervisory authority with oversight over data protection in accordance with applicable laws and regulations.

10.Retention Period for Personal Information

CLB will generally only retain personal information we collect for a period of time reasonably necessary to achieve the particular business purposes for which we collected the personal information. In some cases, we may need to retain personal information for longer periods of time pursuant to laws or regulations applicable to our business. Personal information that is no longer needed will be promptly deleted.

11.Party Responsible for Handling Personal Data (Controller)

ClearLakeBlue Limited, 7 Bell Yard, London, WC2A 2JR, United Kingdom

12.Contact Information for Inquiries about Personal Information

Email address: info@clearlakeblue.com

Changes to this policy:

This policy may be updated. The date on which this policy was most recently updated is noted below.

UPDATED: 21st July 2025