

RSS WEBSITE PRIVACY POLICY

Retail Spotter Solutions (RSS)

Effective date: 5 September 2026

This Privacy Policy explains how The Ministry Group Elevation Ltd, trading as Retail Spotter Solutions (RSS), collects, uses, stores and shares personal information in connection with the RSS website, enquiries, applications and related online services.

1. Who we are

The Ministry Group Elevation Ltd is the controller of personal information described in this Privacy Policy unless another organisation is separately responsible for its own processing.

Trading name: Retail Spotter Solutions (RSS)

Company number: 16273971

Registered office: 3rd Floor, 86-90 Paul Street, London, England, United Kingdom, EC2A 4NE

Privacy and data-protection contact: info@retailspottersolutions.com

Website: <https://www.retailspottersolutions.com/>

2. Scope of this Privacy Policy

This Privacy Policy applies to personal information collected through or in connection with the RSS website, including information submitted through website contact or callback forms, the RSS Client application process, communications with RSS, and related external services used as part of that process.

The RSS website is primarily intended for business users. It is not intended for children, and RSS does not knowingly seek to collect personal information from children through the website.

3. Personal information we may collect

Depending on how you interact with RSS, we may collect the following categories of information:

- Identity and contact information, such as your name, business email address, telephone number, WhatsApp number and preferred contact method.
- Business information, such as business name, trading name, company number, business address, website, social-media details, your position or role and information confirming your authority to act for the business.
- Product and commercial information, such as product descriptions, SKUs, product size or weight, product category, shelf life, storage requirements, wholesale price, case size, recommended retail price, manufacturing country, supply readiness, delivery information, returns information, distribution information, existing listings or relationships, food-safety certifications, product photographs and logos.
- Application and service information, including information submitted in connection with an RSS Client application, service-level selection, pricing acceptance, Sample / Sale or Return selections and other onboarding information.
- Communications, including enquiries, callback requests, emails, messages, meeting or scheduling information and records of relevant business communications.

- Payment and transaction information. Where RSS sends an approved Client a payment link or provides payment instructions, payment may be processed through a third-party payment service provider or through RSS's banking provider, depending on the payment method used at the time. RSS may receive or retain payment status, amount, date, reference and related transaction information. Where card payments are used, full payment-card details are normally handled by the relevant payment provider rather than by RSS.
- Technical information generated when you use the website, which may include IP address, browser or device information, security and server-log information, and cookie or similar-technology data used by the website platform or embedded services.

RSS does not ask you to provide special-category personal information through its normal website or Client application process. Please do not provide sensitive personal information unless RSS specifically asks for it and there is a lawful reason to do so.

4. How we collect personal information

We may collect personal information:

- directly from you when you contact RSS, request a callback, submit an application, correspond with us, attend a meeting or provide information during onboarding;
- through the RSS website, which is built and hosted using Wix;
- through Fillout, which hosts the RSS Client application form;
- through the payment method or provider made available to an approved Client after RSS has accepted the application;
- through Google-based internal systems used by RSS to manage Client and operational records;
- through YouTube where videos are embedded on the website, and through Calendly if RSS introduces Calendly for appointment scheduling; and
- automatically through necessary website technologies, server logs, security tools, cookies or similar technologies.

5. Why we use personal information and our lawful bases

RSS only uses personal information where it has a lawful basis. The principal purposes and lawful bases are set out below. More than one lawful basis may apply depending on the circumstances.

Purpose	Examples	Main lawful basis
Operate and protect the website	Hosting, security, troubleshooting, fraud prevention and necessary technical processing.	Legitimate interests; legal obligation where applicable.
Respond to enquiries and callback requests	Contacting you about an enquiry or requested discussion.	Legitimate interests and/or steps taken at your request before a contract.
Assess Client applications	Reviewing business, product, suitability and onboarding information and deciding whether RSS will accept or reject an application.	Steps taken at your request before entering a contract; legitimate interests.
Enter into and perform the Client relationship	Preparing and executing the Client Services Agreement, onboarding an accepted Client, providing Buyer Opportunities and administering the service.	Contract.

Take and record payment	Providing payment links or payment instructions after approval/agreement, processing payment status and maintaining financial records.	Contract; legal obligation.
Maintain records and protect legal rights	Accounting, tax, compliance, audits, dispute handling, debt recovery, legal claims and evidence.	Legal obligation; legitimate interests.
Provide embedded or scheduling features	Playing embedded video content or enabling appointment scheduling where used.	Consent where required for non-essential cookies or device access; otherwise legitimate interests or contract depending on the feature.

6. Client application and payment process

Submitting an RSS Client application does not itself mean that RSS has accepted the applicant as a Client, does not create the Client service relationship and does not require payment through the application form.

The current process is: the applicant submits the application; RSS reviews it and accepts or rejects it; if accepted, the RSS Client Services Agreement is completed; RSS then provides the applicable payment link or payment instructions; the Client pays; and the service starts once the required contractual and payment steps have been completed.

Payment information is handled according to the payment method used. This may involve a third-party payment service provider or RSS's banking provider, each operating under its own privacy and security arrangements. RSS may retain records confirming payment and transaction status for contractual, accounting and legal purposes. Where a payment link is used, the payment page will identify the relevant provider.

7. Who we share personal information with

RSS may share personal information with trusted service providers where reasonably necessary to operate the website, assess applications, administer the Client relationship, process payments or provide related functions. These may include:

- **Wix:** website platform, hosting, website forms, security and technical services;
- **Fillout:** hosting and processing the RSS Client application form;
- **Google services:** internal business records, CRM-style administration, document or communication management;
- **Payment service providers and banking providers: processing payments after an application has been approved and the Client Services Agreement has been completed;**
- **YouTube / Google:** embedded video functionality;
- **Calendly:** appointment scheduling if and when RSS implements this feature; and
- **professional advisers, insurers, auditors, regulators, courts, law-enforcement bodies or public authorities:** where reasonably necessary or legally required.

RSS does not sell personal information to advertisers.

8. International transfers

Some of the service providers used by RSS operate internationally or may store or process personal information outside the United Kingdom. For example, Wix may process information in several countries; Fillout submission data is processed in the United States by default unless an eligible account is configured for European hosting; and Calendly stores user and invitee data in United States-based infrastructure. A payment service provider or banking provider used by RSS may also process information in the UK or internationally, depending on the provider and payment method in use.

Where UK personal information is transferred to a country that is not covered by an applicable UK adequacy regulation, RSS seeks to rely on an appropriate lawful transfer mechanism or safeguard made available by the relevant provider, such as the UK International Data Transfer Agreement, the UK Addendum to approved Standard Contractual Clauses, or another mechanism permitted by UK data-protection law.

You may contact RSS at info@retailspottersolutions.com if you would like further information about the safeguards relevant to a particular transfer.

9. Cookies, embedded content and similar technologies

The website may use cookies and similar technologies that are necessary for security, core website functionality and the operation of the Wix platform. RSS does not currently use Google Analytics, Meta Pixel, Google Ads, LinkedIn Insight Tag, TikTok Pixel or comparable advertising or behavioural-tracking tools.

The website may include embedded YouTube videos. Where reasonably practicable, RSS uses YouTube's privacy-enhanced embedding. YouTube or other third-party content may still process information when you interact with embedded content.

RSS may also introduce Calendly for scheduling. If a third-party feature uses non-essential cookies or similar technologies that require consent, RSS will use an appropriate consent mechanism and will not intentionally activate those non-essential technologies before the required consent has been obtained.

RSS uses a cookie banner / cookie-management mechanism to give visitors a genuine choice over non-essential cookies where consent is required. Necessary cookies may operate without consent where the law permits, but information about them is still provided.

10. Marketing communications

RSS does not currently provide a general website newsletter or marketing sign-up facility. If RSS introduces promotional email, SMS, WhatsApp or similar marketing in future, RSS will update this Privacy Policy and the relevant sign-up process before that activity begins and will provide any consent and opt-out controls required by applicable law.

11. How long we keep personal information

RSS keeps personal information only for as long as reasonably necessary for the purpose for which it was collected, including to manage enquiries and applications, perform contracts, maintain appropriate business records, comply with legal, tax or accounting obligations, resolve disputes and establish or defend legal claims.

Because different records serve different purposes, RSS does not apply one retention period to all information. In deciding how long to keep information, RSS considers the nature and sensitivity of the information, the purpose for which it is held, whether it is still needed, applicable legal or regulatory requirements and relevant limitation periods.

Information may exist temporarily in backups or archived systems after it is removed from active systems. Service providers such as Wix, Fillout, Google and any payment or banking provider used by RSS may also retain information in accordance with their own contractual, security, legal and backup requirements.

12. Security

RSS takes reasonable technical and organisational measures designed to protect personal information against unauthorised access, loss, misuse, alteration or disclosure. RSS also uses established third-party providers for website hosting, forms, business systems and payments.

No internet transmission or storage system can be guaranteed to be completely secure. You are responsible for taking reasonable care when sending information electronically and for ensuring that information you provide is accurate and appropriate.

13. Your data-protection rights

Depending on the circumstances and the lawful basis used, UK data-protection law may give you rights to:

- ask for access to personal information held about you;
- ask for inaccurate or incomplete information to be corrected;
- ask for personal information to be erased in certain circumstances;
- ask for processing to be restricted in certain circumstances;
- receive certain information in a portable format where the right to data portability applies;
- object to certain processing, including processing based on legitimate interests in appropriate circumstances;
- withdraw consent at any time where RSS relies on consent, without affecting processing carried out before withdrawal; and
- complain to the Information Commissioner's Office (ICO).

These rights are not absolute and may be subject to legal conditions or exemptions. To exercise a right, contact info@retailspottersolutions.com. RSS may need to verify your identity before acting on a request.

You also have the right to complain to the UK Information Commissioner's Office. Information about the ICO and how to raise a concern is available at <https://ico.org.uk/>.

14. Automated decision-making

RSS does not currently use solely automated decision-making through the website that produces legal effects or similarly significant effects on individuals. Client applications are reviewed as part of RSS's operational approval process.

15. External websites and third-party services

The RSS website may contain links to external websites or services. Third parties such as Wix, Fillout, YouTube, Google, Calendly and any payment or banking provider used by RSS may process information under their own privacy notices in circumstances where they act as

independent controllers. RSS is not responsible for the privacy practices of external websites that it does not control. You should review the relevant third party's privacy information where appropriate.

16. Changes to this Privacy Policy

RSS may update this Privacy Policy where its website, services, suppliers, legal obligations or data-processing activities change. The latest version will be published on the RSS website with an updated effective date. Material changes will be brought to users' attention where appropriate.

17. Contact us

If you have a question about this Privacy Policy, how RSS uses personal information, or a data-protection request, contact:

Retail Spotter Solutions (RSS)

The Ministry Group Elevation Ltd

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Email: info@retailspottersolutions.com

Company number: 16273971