

CuelQ Ltd Privacy Policy

Last Updated: 14 Feb 2025

1. Introduction

CuelQ Ltd ("we," "us," or "our") is committed to protecting your privacy. This Privacy Policy explains how we collect, use, disclose, and protect your personal data when you use our pool table video recording service (the "Service"). This policy applies to both Venues (businesses hosting the recording devices) and End Users (individuals who access or interact with the recorded videos).

2. Information We Collect

- **Venue Information:**
 - Contact information (name, address, email, phone number)
 - Business information (company name, registration details)
 - Payment information
 - Account credentials or reference identifiers
 - Location data of the installed recording devices
- **End User Information:**
 - Contact information (if provided, e.g., for account creation)
 - Account credentials (if applicable)
 - Video recordings of pool table activity (which may include images of individuals, although primarily focused on hands, arms, and backs of heads)
 - Usage data (e.g., how you interact with the Service, which videos you view)
 - Device information (e.g., IP address, browser type, operating system)
- **Anonymised Data:**
 - Video data with all personal identifiers obscured or removed.
- **Table Video Streams**
 - Video data captured as directed by end users of their playing sessions at venues and other locations with CuelQ systems installed
- **Aggregated data:**
 - Usage data and video data that has been aggregated and cannot be related back to a singular entity or party.

3. How We Use Your Information

We use your information for the following purposes:

- **Providing the Service:** To operate, maintain, and improve the Service; to process payments; to provide customer support; to manage Venue and End User accounts.
- **Video Processing:** To record, store, and process video footage; to provide access to videos (subject to Venue settings and these Terms).
- **Communication:** To send you service-related notices, updates, and promotional materials (you can opt out of marketing communications).
- **Legal Compliance:** To comply with applicable laws and regulations.

- **Research and Development:** To analyze usage patterns and improve our Service (using anonymized or aggregated data where possible).
- **Anonymisation:** To refine the anonymisation process.

4. Legal Basis for Processing (UK GDPR)

We rely on the following legal bases for processing your personal data:

- **Contract Performance:** For Venues, processing is necessary for the performance of our contract with you. For End Users, processing may be necessary to provide the Service you request.
- **Legitimate Interests:** We may process your data based on our legitimate interests (e.g., improving the Service, ensuring security), provided these interests are not overridden by your rights and freedoms. We have conducted a Legitimate Interests Assessment (LIA) to support this.
- **Consent:** We may rely on consent in specific cases (e.g., for certain marketing communications).
- **Legal Obligation:** We may process your data to comply with legal obligations.

5. Sharing Your Information

We may share your information with the following categories of recipients:

- **Service Providers:** Third-party companies that provide services to us (e.g., cloud storage, payment processors, analytics providers). These providers are contractually obligated to protect your data.
- **Venues:** End User data (including video footage) may be accessible to the Venue where the recording device is located, subject to their settings.
- **Legal Authorities:** We may disclose your information to law enforcement or other government authorities if required by law or legal process.
- **Business Transfers:** In the event of a merger, acquisition, or sale of all or a portion of our assets, your information may be transferred to the acquiring entity.

6. International Data Transfers

If we transfer your personal data outside the UK or the European Economic Area (EEA), we will ensure that appropriate safeguards are in place, such as Standard Contractual Clauses or reliance on the recipient's Privacy Shield certification (if applicable).

7. Data Retention

We will retain your personal data for as long as necessary to fulfill the purposes for which it was collected, including for the purposes of satisfying any legal, accounting, or reporting requirements. Specific retention periods will vary depending on the type of data and the purpose of processing. Anonymised data can be retained indefinitely.

8. Your Rights (UK GDPR)

You have the following rights regarding your personal data:

- **Access:** You have the right to request access to the personal data we hold about you.
- **Rectification:** You have the right to request that we correct any inaccurate personal data we hold about you.
- **Erasure ("Right to be Forgotten"):** You have the right to request that we erase your personal data in certain circumstances.
- **Restriction of Processing:** You have the right to request that we restrict the processing of your personal data in certain circumstances.
- **Data Portability:** You have the right to receive a copy of your personal data in a structured, commonly used, and machine-readable format.
- **Object:** You have the right to object to the processing of your personal data in certain circumstances (e.g., processing based on legitimate interests).
- **Withdraw Consent:** If we are processing your data based on consent, you have the right to withdraw your consent at any time.

To exercise these rights, please contact us using the information provided below.

9. Security

We implement appropriate technical and organizational measures to protect your personal data from unauthorized access, use, disclosure, alteration, or destruction.

10. Cookies

We use Cookies to provide functionality of the web interface and to anonymously track the performance of features presented.

11. Changes to this Privacy Policy

We may update this Privacy Policy from time to time. We will post any changes on our website and, where appropriate, notify you by email.

12. Contact Us

If you have any questions or concerns about this Privacy Policy, please contact us at:

info@cueiq.net