Curate
Privacy Notice

Curate is a secure artwork collection management app that helps users organise and manage artworks in one place. It has been developed and is operated by Colour One for Colour Themes and its private clients as an exclusive platform designed specifically for artwork collection management.

This Privacy Notice (“Notice”) explains how Colour Themes (“we”, “us” or “our”) collects, processes, uses and protects the information you provide to us. Any personal information you provide will only be used in accordance with this Notice.

Once you have been invited to Curate, we will work with you one-on-one to set up your profile. This process is conducted on a confidential, invitation-only basis to ensure your information is handled securely. To enable use of the app, it is necessary for us to upload information about your artwork collection. We will use information about your artwork collection provided by you to us, along with relevant information about artworks you acquire through Colour Themes.

The app is free to use and does not require a subscription fee. Access is currently by invitation only. We will never compromise your privacy or require payment to protect your data.

We are committed to protecting the privacy of our users and the confidentiality of your artwork information. We apply industry-standard security practices to maintain a secure collection management platform. We are committed to ensuring that any personal information you give us is protected and that we comply with applicable data protection legislation, including the UK General Data Protection Regulation (“UK GDPR”) and the Data Protection Act 2018.

Who we are

Colour Themes HK Limited ("Colour Themes", "we", "us" or "our") is the data controller responsible for the personal information processed

through Curate.

Colour Themes is a Hong Kong company with registration number 2857462 and registered address at Room 1501, 15/F, Prosperity Tower, 39 Queen's Road, Hong Kong.

Colour One Ltd, a UK limited company with registration number 13034367 and registered address 33 Cork Street, 1st Floor, London W1S 3NQ, acts as our data processor. Colour One operates and manages Curate on our behalf, including hosting the platform and handling day-to-day communications with you in connection with your account.

If you have any questions about this Notice or how we process your personal information, please contact us at curate@colourthemes.com.

Information we gather

We may collect:

- Information you provide, such as your name, email address, phone number and company name (if relevant), as well as any other personal data you provide in the app and on the website.
- Details about your artworks, including images, cataloguing, ownership, provenance, exhibition history, and financial information.
- Questions or feedback that you send to us if you contact us.
- Analytics and error-reporting data about how you use the app and the website. We use tools that run in your browser. Depending on your cookie preferences, it may include your interactions within the app, your IP address, and your browser or device type. These tools use cookies or similar technologies (see "Cookies" below), and we ask for your consent before enabling them.

We collect and store this information for the purpose of providing and maintaining your account and the Curate service. We will only access the contents of your collection where necessary to provide, maintain or support the service, or where you have otherwise authorised us to do so.

Where we receive personal information about you from another person or organisation, such as a client, adviser or other third party, we may use that information for the purposes described in this Notice. Where required by applicable data protection law, we will provide you with appropriate privacy information about that processing.

How we use the information we gather:

- To respond to your requests, questions, or feedback, and provide the products, services, and any support you request.
- To monitor and analyse how the app or the website are used, including which features users engage with most, so that we can

improve functionality and user experience.
- To ensure the security of our app and website, identify potential security threats, and verify your identity.
- To comply with applicable legal and regulatory obligations.
- To notify you of changes to our services.
- To administer your account and maintain the security, functionality and performance of Curate.
- To maintain appropriate business and operational records, and where permitted by law, to communicate with you about Curate and our services.

Legal basis for processing:

We will only process your personal information where we have a lawful basis to do so. Depending on the circumstances, we may rely on the following lawful bases:

- Contract: where processing is necessary to provide Curate and the services you have requested, or to take steps at your request before providing those services.
- Legitimate interests: where processing is necessary for our legitimate interests, or those of a third party, provided that those interests are not overridden by your interests or fundamental rights and freedoms.
- Legal obligation: where processing is necessary for us to comply with a legal or regulatory obligation.
- Consent: where we ask for your consent to process your personal information for a particular purpose. Where we rely on consent, you may withdraw your consent at any time.

We do not process special category personal data.

Legitimate interests:

Where we rely on legitimate interests as our lawful basis for processing your personal information, our legitimate interests may include:

- Providing you with a smooth and efficient client experience.
- Providing and supporting the services you have requested.
- Maintaining and improving Curate and our related services.
- Maintaining the security of our systems and services.
- Conducting internal research and analysis to improve our services.

Keeping your information safe:

We are committed to protecting your personal data and maintaining its accuracy, security and correct use. To prevent unauthorised access or disclosure:

- We implement appropriate technical and organisational security measures, including, the use of secure server facilities, firewalls, encryption, access rights management systems and processes, careful selection of data processors, and all other necessary measures to provide appropriate security and protection for your personal data against unauthorised use or disclosure.
- We may also make backup copies and use other similar means to prevent accidental damage to, or destruction of, your personal data.
- We keep your personal data only as long as it is necessary. Your account details and artwork records are kept for as long as your account is active, and are deleted or archived within 30 days of your account closing. Server logs are kept for up to 90 days, and system backups for up to around 120 days. Analytics data is retained by our provider for up to two years, and error and crash reports for up to 90 days. Retention periods are reviewed annually, and when we are no longer entitled to hold data it is securely deleted or archived.
- We will only share your personal information in the circumstances described under ‘Sharing your personal information’ below.

Sharing your personal information:

We may share your personal information where necessary for the purposes described in this Notice, where we have a lawful basis to do so, or where we are required or permitted by law. We do not sell your personal information.

We may share your data with the following categories of companies to be able to provide our services to you:

- Companies that host and run Curate and support our team to work more efficiently, such as cloud hosting and infrastructure (AWS), product analytics (Mixpanel), error/crash reporting (Sentry), and content-delivery and font providers (Google).
- Affiliate companies that enable us to provide our services to you.
- Other trusted business partners, suppliers, or subcontractors.

These organisations may process personal information on our behalf as our service providers or data processors. Where appropriate, we will have contractual arrangements in place requiring them to protect personal information and only process it in accordance with our instructions and applicable law.

We may also disclose your information if required by:

- Law enforcement agencies, other governmental agencies or third parties if we are required by law to do so
- Other business entities, should we plan to merge with or be acquired by that business entity, or if we undergo a re-organisation involving that entity.

Transferring your information outside the UK:

Some of our service providers or other recipients of personal information may be located outside the UK. Where we transfer personal information outside the UK, we will only do so where permitted by applicable data protection law.

Our platform and the personal data stored within it are hosted in the European Union (Ireland), which the UK recognises as providing an adequate level of protection. A limited amount of data, including your IP address, may be shared with content-delivery and font providers based in the United States when the app loads. Where we transfer personal data outside the UK, we rely on an appropriate lawful transfer mechanism, such as the UK IDTA or the UK Addendum to the EU Standard Contractual Clauses, where required.

Depending on the destination and circumstances, this may include transferring personal information to a country that has been recognised by the UK as providing an adequate level of protection, or using appropriate safeguards such as the UK International Data Transfer Agreement ("IDTA"), the UK Addendum to the EU Standard Contractual Clauses, or another lawful transfer mechanism.

Where required, we will also carry out any assessment or put in place any additional measures required by applicable data protection law.

You can contact us using the details below if you would like further information about the safeguards we use for international transfers.

Your rights:

Depending on the circumstances and subject to applicable legal exemptions, you may have the following rights in relation to your personal information:

- The right to request access to the personal information we hold about you.
- The right to request that inaccurate or incomplete personal information is corrected.
- The right to request that your personal information is erased in certain circumstances.
- The right to request that we restrict the processing of your personal information in certain circumstances.
- The right to object to certain processing, including processing based on our legitimate interests and, where applicable, direct marketing.
- Where applicable, the right to receive personal information you have provided to us in a structured, commonly used and machine-readable format and to request that it is transferred to another organisation.

- Where we rely on your consent, the right to withdraw your consent at any time.

You may exercise these rights by contacting us at curate@colourone.com.

Cookies

We use cookies and similar technologies to operate, secure and improve your experience when using the Curate app.

Cookies are small data files that are stored on your device when you visit a website. Cookies can help us to provide functionality, understand how our website and app are used, and improve our services.

Some cookies or similar technologies are strictly necessary for the operation and security of the service. The main non-essential cookies we use are set by Mixpanel, our product-analytics provider, and only after you accept cookies. Where required by law, we will ask for your consent before using non-essential cookies or similar technologies.

You can manage your cookie preferences through our cookie settings where available. You can also restrict or block cookies through your browser or device settings, although doing so may affect the functionality of Curate.

Complaints:

Questions, comments and requests regarding this Notice are welcomed and should be addressed to curate@colourone.com.

If you have any concerns about our use of your personal information, please contact us in the first instance so that we can try to resolve your concern.

You also have the right to make a complaint to the Information Commissioner's Office (“ICO”), the UK's supervisory authority for data protection. Further information about making a complaint is available on the ICO's website.

Changes to our Privacy Notice:

We reserve the right to update this Notice from time to time. Any changes we make will be posted on this page and, where appropriate, notified to you by email.

Where we make material changes to the ways in which we process your personal information, we will provide appropriate notice before those changes take effect where required by applicable law.

Please check this page periodically for updates or changes to this Notice.

Please contact curate@colourone.com with any questions or comments relating to this policy or our app.

05 October 2026