

## **Privacy Policy**

Happy Laundry and Dry Cleaning respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data, tell you about your privacy rights and how the law protects you when:

- you visit our website at Happy Laundry and Dry Cleaning app.com (regardless of where you visit it from) (“Site”);
- you access our web app
- you access our platform through our Site or App (“Platform”);
- we provide to you with our sales software and online ordering services for pickup and delivery services through the Platform (“Services”).

### **Information we may collect about or from you.**

We may collect and process the following data about you:

- Information you give us. You may give us information about you by filling in forms on our Site, by using the App, by participating in our competitions or promotions or by corresponding with us by phone, e-mail or otherwise. The information you give us may include your name, address, e-mail address and phone number.
- Information we collect about you. Each time you visit the Site or use the App we may automatically collect the following information: technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- Information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from the Site or the App (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse away from the page and any phone number used to call our customer service number.

### **Cookies**

The Site uses cookies to distinguish you from other users of the Site. This helps us to provide you with a good experience when you browse the Site and also allows us to improve the Site.

### **How we use your personal data**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

**Purposes for which we will use your personal data**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new Customer or User	(a) Identity (b) Contact	Performance of a contract with you
To provide the Services to you including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Profile	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us) >(c) Necessary for the legitimate interests of others (preventing fraud)
To manage our relationship with you which will include: (a) Notify you about changes to our terms, privacy policy or Services (b) Ask you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated, study how Customers and Users use the Services and to improve the Services into the future)
To administer and protect our business, the Site, App, Platform and Services (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Financial (d) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise) (b) Necessary to comply with our legal obligations
To deliver relevant Site content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how Customers and Users use the Services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our Site, App, Platform Services,	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of Customers and

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
marketing, customer relationships and experiences	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Users for the Site, App, Platform and Services, to keep our Site, App and Platform updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about Services or events that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop the Services and grow our business)

## Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

### Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which Services and offers may be relevant for you and send to you through our marketing messages.

You will receive marketing messages from us if you have requested information from us or purchased Services from us and you have not opted out of receiving that marketing.

### Third-party links

Our Site may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our Site, we encourage you to read the privacy notice of every website you visit.

### Opting Out

You can always opt-out of receiving marketing or promotional emails from us, and all future marketing and promotional communications will also contain a simple way to opt out of receiving such further communications from us. We will get your express consent before we share your personal data with any third party for marketing purposes.

### Information we collect about you. We will use this information:

- to provide the Service in accordance with our contract with you;
- to administer the Site and manage the App and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve the Site and/or the App and to ensure that the content is presented in the most effective manner for you and your computer;

- to allow you to participate in interactive features of our Service, when you choose to do so;
- as part of our efforts to keep our Site and the App safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others and to deliver relevant advertising to you on the Site or the App;
- to make suggestions and recommendations to you and other users of the Site and the App about goods or services that may interest you or them.
- to publicize your participation in our competitions or promotions by using your name and photograph in any media, but only if we have your express consent to do so which you can withdraw at any time by emailing us.

## **Who we share your information with**

We may share your information with selected third parties including:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you, on the basis that it is necessary to perform the contract that we have with you or for our legitimate interests in managing our business and improving the Service.
- Analytics, technical developers and search engine providers that assist us in the improvement and optimization of our App, on the basis that it is necessary for our legitimate interests in doing so.
- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- We may also transfer your personal data if we are under a duty to do so in order to comply with any legal obligation, or if it is necessary for our legitimate interests in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of Happy Laundry and Dry Cleaning, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

## **Where we store your personal data**

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”) for our own administration purposes. It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. Whenever we transfer your data outside the EEA, we ensure that a similar degree of protection is afforded to it by ensuring that at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use providers based in the USA, we ensure that they are part of the US-EU Privacy Shield (for which see <https://www.privacyshield.gov/welcome>); and
- Where we use other providers we will ensure that the data transfers are subject to the EU Model Contract Clauses for the transfer of personal data to third countries (for which see

[https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en)).

## **Security**

- All information you provide to us is stored on our secure servers or those of our trusted providers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of the Site or the App, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.
- Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to the Site or the App; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

## **How long we retain personal data**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances, we may anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you as this is no longer personal information.

## **Your rights**

As a data subject you have certain legal rights subject to certain exceptions under the applicable Data Protection legislation including:

- the right to access the personal data held about you;
- the right to ask us not to process your personal data for marketing purposes;
- the right to withdraw at any time any consent you have given to receive marketing material from us, or in any other case where we process your personal data on the basis of a consent that you have given (and not on some other legal basis);
- the right to ask us to rectify inaccurate personal data about you;
- the right to ask for the restriction of personal data concerning yourself that is inaccurate, unlawfully processed or no longer required;
- the right to ask for the transfer of your personal data in a structured, commonly used and machine readable format where the processing is based on your consent;
- the right to ask for the erasure of personal data concerning yourself where processing is no longer necessary or the legitimate interests we have in processing your personal data are overridden by your interests, rights and freedoms as the data subject; and
- the right to withdraw your consent at any time to your name or image being used in connection with any of our competitions or promotions for publicity purposes.

You can exercise any of your rights at any time by contacting us at [clean@happy-laundry.com](mailto:clean@happy-laundry.com)

### **Changes to our policy**

Any changes we may make to our policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our policy.

### **Contact**

If you have any questions or suggestions about our Policy, do not hesitate to contact us at [Happy Laundry and Dry Cleaning

Contact – Clean@happy-laundry.com. Postal address: Happy Laundry & Dry Cleaning 3027 E Mission Ave Spokane, WA 99202 Telephone number: (509) 481-9150.