

SPRINK GDPR COMPLAINEE

(Last Updated August 27, 2020)

1. Overview

Sprink cares about your privacy. For this reason, we collect and use personal data only as it might be needed for us to deliver to you our world-class products, services, websites and mobile applications (collectively, our “Services”). Your personal data includes information such as:

- Name
- Address
- Telephone number
- Date of birth
- Email address
- Other data collected that could directly or indirectly identify you.

Our Privacy Policy is intended to describe to you how and what data we collect, and how and why we use your personal data. It also describes options we provide for you to access, update or otherwise take control of your personal data that we process.

If at any time you have questions about our practices or any of your rights described below, you may reach us by contacting us at Wecare@Sprinkclean.com. This inbox is actively monitored and managed so that we can deliver an experience that you can confidently trust.

2. What information do we collect?

We collect information so that we can provide the best possible experience when you utilize our Services. Much of what you likely consider personal data is collected directly from you when you:

- create an account or purchase any of our Services (ex: billing information, including name, address, credit card number, government identification);
- request assistance from our award-winning customer support team (ex: phone number);
- complete contact forms, digital forms, business cards collected in branch or request newsletters or other information from us (ex: email, ipad);

- participate in contests and surveys, apply for a job, or otherwise participate in activities we promote that might require information about you.

However, we also collect additional information when delivering our Services to you to ensure necessary and optimal performance. These methods of collection may not be as obvious to you, so we wanted to highlight and explain below a bit more about what these might be (as they vary from time to time) and how they work:

- a) **Account related information** is collected in association with your use of our Services, such as account number, purchases, bookings, promotions, when you need to book your next treatment, information requests, and customer service requests and notes or details explaining what you asked for and how we responded.
- b) **Cookies and similar technologies** on our websites and our mobile applications allow us to track your browsing behaviour, links clicked, items purchased, your device type, and to collect various data, including analytics, about how you use and interact with our Services. This allows us to provide you with more relevant product offerings, a better experience on our sites and mobile applications, and to collect, analyse and improve the performance of our Services. We may also collect your location (IP address) so that we can personalize our Services. For additional information, and to learn how to manage the technologies we utilize, please visit our Cookie Policy.
- c) **Data about Usage of Services** is automatically collected when you use and interact with our Services, including metadata, log files, cookie/device IDs and location information. This information includes specific data about your interactions with the features, content and links (including those of third-parties, such as social media plugins) contained within the Services, Internet Protocol (IP) address, browser type and settings, the date and time the Services were used, information about browser configuration and plugins, language preferences and cookie data, information about devices accessing the Services, including type of device, what operating system is used, device settings, application IDs, unique device identifiers and error data, and some of this data collected might be capable of and be used to approximate your location.
- d) **Supplemented Data** may be received about you from other sources, including publicly available databases or third parties from whom we have purchased data, in which case we may combine this data with information we already have about you so that we can update, expand and analyse the accuracy of our records, identify new customers, and provide products and services that may be of interest to you. If you provide us personal information about others, or if others give us your information, we will only use that information for the specific reason for which it was provided to us.

3. How we utilize information.

We strongly believe in both minimizing the data we collect and limiting its use and purpose to only that (1) for which we have been given permission, (2) as necessary to deliver the Services you purchase or interact with, or (3) as we might be required or permitted for legal compliance or other lawful purposes. These uses include:

- a) **Delivering, improving, updating and enhancing the Services we provide to you.** We collect various information relating to your purchase, use and/or interactions with our Services. We utilize this information to:
- Improve and optimize the operation and performance of our Services (again, including our websites and mobile applications)
 - Diagnose problems with and identify any security risks, errors, or needed enhancements to the Services
 - Detect and prevent fraud and abuse of our Services and systems
 - Collecting aggregate statistics about use of the Services
 - Understand and analyse how you use our Services and what products and services are most relevant to you.

Often, much of the data collected is aggregated or statistical data about how individuals use our Services, and is not linked to any personal data, but to the extent it is itself personal data, or is linked or linkable to personal data, we treat it accordingly.

- b) **Sharing with trusted third parties.** We may share your personal data with affiliated companies within our corporate family, with third parties with which we have partnered to allow you to integrate their services into our own Services, and with trusted third party service providers as necessary for them to perform services on our behalf, such as:
- Processing credit card payments
 - Serving advertisements
 - Conducting contests or surveys
 - Performing analysis of our Services and customers demographics
 - Communicating with you, such as by way email or survey delivery
 - Customer relationship management.

We only share your personal data as necessary for any third party to provide the services as requested or as needed on our behalf. These third parties (and any subcontractors) are subject to strict data processing terms and conditions and are prohibited from utilizing, sharing or retaining your personal data for any purpose other than as they have been specifically contracted for (or without your consent).

- c) **Communicating with you.** We may contact you directly or through a third party service provider regarding products or services you have signed up or purchased from us, such as necessary to deliver transactional or service related communications. We may also contact you with offers for additional services we think you'll find valuable if you give us consent, or where allowed based upon legitimate interests. You don't need to provide consent as a condition to purchase our goods or services. These contacts may include:
- Email
 - Text (SMS) messages
 - Telephone calls
 - Automated phone calls or text messages.

You may also update your subscription preferences with respect to receiving communications from us and/or our partners signing into your account and visiting "Account Settings" page or alternatively emailing us at Wecare@Sprinkclean.com.

If we collect information from you in connection with a co-branded offer, it will be clear at the point of collection who is collecting the information and whose privacy policy applies. In addition, it will describe any choice options you have in regards to the use and/or sharing of your personal data with a co-branded partner, as well as how to exercise those options.

If you make use of a service that allows you to import contacts (ex. using email marketing services to send emails on your behalf), we will only use the contacts and any other personal information for the requested service. If you believe that anyone has provided us with your personal information and you would like to request that it be removed from our database, please contact us at Wecare@Sprinkclean.com

- d) **Transfer of personal data abroad.** If you utilize our Services from a country other than the country where our servers are located, your communications with us may result in transferring your personal data across international borders. Also, when you call us or initiate a chat, we may provide you with support from one of our global locations outside your country of origin. In these cases, your personal data is handled according to this Privacy Policy.
- e) **Compliance with legal, regulatory and law enforcement requests.** We cooperate with government and law enforcement officials and private parties to enforce and comply with the law. We will disclose any information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate to respond to claims and legal process (such as subpoena requests), to protect our property and rights or the property and rights of a third party, to protect the

safety of the public or any person, or to prevent or stop activity we consider to be illegal or unethical.

To the extent we are legally permitted to do so, we will take reasonable steps to notify you in the event that we are required to provide your personal information to third parties as part of legal process. We will also share your information to the extent necessary to comply with Information Commissioner's Office (ICO) or regulations and policies when you register a domain name with us.

- a) **Website analytics.** We use web analytics tools provided by service partner Google Analytics to collect information about how you interact with our website or mobile applications, including what pages you visit, what site you visited prior to visiting our website, how much time you spend on each page, what operating system and web browser you use and network and IP information. We use the information provided by these tools to improve our Services. These tools place persistent cookies in your browser to identify you as a unique user the next time you visit our website. Each cookie cannot be used by anyone other than the service provider (ex: Google for Google Analytics). The information collected from the cookie may be transmitted to and stored by the service partner on servers in a country other than the country in which you reside. Though information collected does not include personal data such as name, address, billing information, etc., the information collected is used and shared by these service providers in accordance with their individual privacy policies. You can control the technologies we use by managing your settings through our Cookie Policy or the 'cookie banners' that may be presented (depending on URL of website visited) when you first visit our webpages, or by utilizing settings in your browser or third-party tools, such as Disconnect, Ghostery and others.
- b) **Targeted advertisements.** Targeted ads or interest-based offers may be presented to you based on your activities on our webpages, and other websites, and based on the products you currently own. These offers will display as varying product banners presented to you while browsing. We also partner with third parties to manage our advertising on our webpages and other websites. Our third party partners may use technologies such as cookies to gather information about such activities in order to provide you with advertising based upon your browsing activities and interests, and to measure advertising effectiveness. If you wish to opt out of interest-based advertising, [click here](#). Please note you will continue to receive generic ads.

4. **Third-party websites.**

Our website and our mobile applications contain links to third-party websites. We are not responsible for the privacy practices or the content of third-party sites. Please read the privacy policy of any website you visit.

5. How you can access, update or delete your data.

To easily access, view, update, delete or port your personal data (where available), or to update your subscription preferences, please sign into your Account and visit “Account Settings.” If you make a request to delete your personal data and that data is necessary for the products or services you have purchased, the request will be honoured only to the extent it is no longer necessary for any Services purchased or required for our legitimate business purposes or legal or contractual record keeping requirements. If you are unable for any reason to access your Account Settings, you may also contact us by one of the methods described in the “Contact Us” section below.

6. How we secure, store and retain your data.

We follow generally accepted standards to store and protect the personal data we collect, both during transmission and once received and stored, including utilization of encryption where appropriate.

We retain personal data only for as long as necessary to provide the Services you have requested and thereafter for a variety of legitimate legal or business purposes. These might include retention periods:

- mandated by law, contract or similar obligations applicable to our business operations;
- for preserving, resolving, defending or enforcing our legal/contractual rights; or
- Needed to maintain adequate and accurate business and financial records.

If you have any questions about the security or retention of your personal data, you can contact us at Wecare@Sprinkclean.com

7. Secured Locations

Where possible, personal data resides within the UK territory but may be transferred to, and stored at, a destination outside the European Economic Area (EEA). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. We will take all reasonable steps to ensure that your data is treated securely, in accordance with this privacy statement.

We have taken steps to ensure all personal data is provided with adequate protection and that all transfers of personal data outside the EEA are done lawfully. Where we transfer personal data outside of the EEA to a country not determined by the European Commission as providing an adequate level of protection for personal data, the transfers will be under an agreement which covers the EU requirements for the transfer of personal data outside the EU.

8. 'Do Not Track' notifications.

Some browsers allow you to automatically notify websites you visit not to track you using a "Do Not Track" signal. There is no consensus among industry participants as to what "Do Not Track" means in this context. Like many websites and online services, we currently do not alter our practices when we receive a "Do Not Track" signal from a visitor's browser. To find out more about "Do Not Track," you may wish to visit www.allaboutdnt.com.

9. Age restrictions

Our Services are available for purchase only for those over the age of 13. Our Services are not targeted to, intended to be consumed by or designed to entice individuals under the age of 13. If you know of or have reason to believe anyone under the age of 13 has provided us with any personal data, please contact us.

10. Changes in our Policy

We reserve the right to modify this Policy at any time. If we decide to change our Policy, we will post those changes to this Policy and any other places we deem appropriate, so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. If we make material changes to this Policy, we will notify you here, by email, or by means of a notice on our home page, at least thirty (30) days prior to the implementation of the changes.

11. Your Rights.

Individuals have certain rights over their personal data and data controllers are responsible for fulfilling these rights as follows:

- Individuals may request access to their personal data held by us as a data controller.
- Individuals may request us to rectify personal data submitted to us.
- Individuals may request that we erase their personal data

- Where we process personal data based on consent, individuals may withdraw their consent at any time by contacting us.
- Individuals may have other rights to restrict or object to our processing of personal data and the right to data portability by giving us written notice.
- Individuals may request information about, or for human intervention into, any automated data processing that we may undertake.

12. Data Protection Authority.

If you are a resident of the European Economic Area (EEA) and believe we maintain your personal data subject to the General Data Protection Regulation (GDPR), you may direct questions or complaints to our lead supervisory authority.

13. Contact us.

You may update your subscription preferences with respect to receiving communications from us and/or our partners or sign in into your account and visiting “Account Settings” page or alternatively emailing us at Wecare@Sprinkclean.com