

# Privacy Notice

## I. Introduction

When you use Coin Laundry, you trust us with your personal data. We're committed to keeping that trust. That starts with helping you understand our privacy practices.

This notice describes the personal data we collect, how it's used and shared, and your choices regarding this data. We recommend that you read this along with our legal document, which highlights key points about our company practices.

Last modified: JUNE 01, 2020

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## II. Overview

### A. Scope

This notice applies to users of Coin Laundry's services anywhere in the world, including users of Coin Laundry's apps, websites, features, or other services.

This notice describes how Coin Laundry and its affiliates collect and use personal data. This notice applies to all users of our apps, websites, features, or other services anywhere in the world, this notice specifically applies to:

This notice also governs Coin Laundry's other collections of personal data in connection with Coin Laundry's services. For example, we may collect the contact information of individuals who use accounts owned by Coin Laundry for Business customers or of owners or employees of Coin Laundry or we may collect other personal data in connection with our mapping technology and features.

Our data practices are subject to applicable laws in the places in which we operate. This means that we engage in the practices described in this notice in a country or region only if permitted under the laws of those places. Please contact us here or through the addresses below with any questions regarding our practices in a country or region.

### B. Data collections and uses

#### A. The Data we collect

Coin Laundry collects:

- Data provided by users to Coin Laundry, such as during account creation

- Data created during use of our services, such as washing, drying or door Step services
- Data from other sources, such as Coin Laundry partners and third parties that use Coin Laundry APIs

The following data is collected by or on behalf of Coin Laundry:

1. Data provided by users. This includes:

- User profile: We collect data when users create or update their Coin Laundry accounts. This may include their name, email, phone number, login name and password, address, profile picture, payment or banking information (including related payment verification information), government identification documents, including, birthdate, signature, and photo.
- Demographic data: We may collect demographic data about users, including through user surveys. In some countries, we may also receive demographic data about users from third parties.
- User content: We collect the information users submit when they contact Coin Laundry customer support, provide ratings or compliments for other users or otherwise contact Coin Laundry. This may include feedback, photographs or other recordings collected by users.

2. Data created during use of our services. This includes:

- Location data: We collect precise or approximate location data from a user's mobile device if enabled by the user to do so. Coin Laundry collects this data when the Coin Laundry app is running in the foreground (app open and on-screen) or background of their mobile device.
- Transaction information: We collect transaction information related to the use of our services, including the type of services requested or provided, order details, delivery information, date and time the service was provided, amount charged and payment method. Additionally, if someone uses your promotion code, we may associate your name with that person.
- Usage data: We collect data about how users interact with our services. This includes data such as access dates and times, app features or pages viewed, app crashes and other system activity.
- Device data: We may collect data about the devices used to access our services, including the hardware models, device IP address, operating systems and versions, software, preferred languages, and mobile network data.
- Communications data: We enable users to communicate with each other and Coin Laundry through Coin Laundry's mobile apps and websites. For example, we enable storekeeper and customer or delivery partners and delivery recipients, to call, text, or send other files to each

other (generally without disclosing their telephone numbers to each other). To provide this service, Coin Laundry receives some data regarding the calls, texts, or other communications, including the date and time of the communications and the content of the communications. Coin Laundry may also use this data for customer support services (including to resolve disputes between users), for safety and security purposes, to improve our products and services, and for analytics.

### 3. Data from other sources. This includes:

- User feedback, such as ratings, feedback, or compliments.
- Users participating in our referral programs. For example, when a user refers another person, we receive the referred person's personal data from that user.
- Coin Laundry account owners who request services for or on behalf of other users, or who enable such users to request or receive services through their accounts. This includes owners of Coin Laundry for Business accounts.
- Users or others providing information in connection with claims or disputes.
- Coin Laundry business partners through which users create or access their Coin Laundry account, such as payment providers, social media services, or apps or websites that use Coin Laundry's APIs or whose APIs Coin Laundry uses.
- Vendors who help us verify users' identity, background information, and eligibility to work, for regulatory, safety, and security purposes.
- Publicly available sources.
- Marketing service providers.

Coin Laundry may combine the data collected from these sources with other data in its possession.

#### B. How we use personal data

Coin Laundry collects and uses data to enable reliable and convenient laundry services and other products and services. We also use the data we collect:

- ❖ To enhance the safety and security of our users and services
- ❖ For customer support
- ❖ For research and development
- ❖ To enable communications between users
- ❖ To send marketing and non-marketing communications to users
- ❖ In connection with legal proceedings

**Coin Laundry does not sell or share user personal data with third parties for their direct marketing, except with users' consent.**

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Coin Laundry uses the data it collects for purposes including:

1. Providing services and features. Coin Laundry uses the data we collect to provide, personalize, maintain, and improve our products and services.

This includes using the data to:

- ❖ Create and update users' accounts.
- ❖ Offer, process, or facilitate payments for our services.
- ❖ Perform internal operations necessary to provide our services, including to troubleshoot software bugs and operational problems; to conduct data analysis, testing, and research; and to monitor and analyze usage and activity trends.

2. Customer support. Coin Laundry uses the information we collect (including recordings of customer support calls with notice to and the consent of the user) to provide customer support, including to:

- ❖ Direct questions to the appropriate customer support person
- ❖ Investigate and address user concerns
- ❖ Monitor and improve our customer support responses and processes

3. Research and development. We may use the data we collect for testing, research, analysis, product development, and machine learning to improve the user experience. This helps us to improve and enhance the safety and security of our services, improve our ability to prevent the use of our services for illegal or improper purposes, develop new features and products.

4. Enabling communications between users. For example, a storekeeper may message or call a customer to confirm a pickup location and order ready information.

6. Marketing. Coin Laundry may use the data we collect to market our services to our users. This includes sending users communications about Coin Laundry services, features, promotions, studies, surveys, news, updates, and events.

We may also send communications to our users about products and services offered by Coin Laundry partners. For example, if a user has placed an Coin Laundry washing order, we may provide recommendations, promotions, or ads about similar order offered by other Coin Laundry partners. Although we may send users communications about Coin Laundry partners' products and services, we do not sell users' personal data to, or share it with, such partners or others for purposes of their own direct marketing or advertising, except with users' consent.

We may use the data we collect to personalize the marketing communications (including advertisements) that we send, including based on user location, past use of Coin Laundry's services, and user preferences and settings.

7. Non-marketing communications. Coin Laundry may use the data we collect to generate and provide users with receipts; inform them of changes to our terms, services, or policies; or send other communications that aren't for the purpose of marketing the services or products of Coin Laundry or its partners.

8. Legal proceedings and requirements. We may use the personal data we collect to investigate or address claims or disputes relating to use of Coin Laundry's services, or as otherwise allowed by applicable law, or as requested by regulators, government entities, and official inquiries.

9. Automated decision-making

We use personal data to make automated decisions relating to use of our services. This includes:

- ❖ Enabling dynamic pricing, in which the price of a washing/drying, or the delivery fee for Coin Laundry orders, is determined based on constantly varying factors such as the estimated time and distance, the predicted route, estimated traffic, and the number of order.
- ❖ Deactivating users who are identified as having engaged in fraud or activities that may otherwise harm Coin Laundry, its users, and others. In some cases, such as when a user is determined to be abusing Coin Laundry's referral program, such behavior may result in automatic deactivation.
- ❖ For those who participate in Coin Laundry's referral program, we share certain personal data of referred users, such as with the user who referred them, to the extent relevant to determining the referral bonus.

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## **C. Data sharing and disclosure**

1. With the general public

Questions or comments from users submitted through public forums such as Coin Laundry blogs and Coin Laundry social media pages may be viewable by the public, including any personal data included in the questions or comments submitted by a user.

2. With Coin Laundry service providers and business partners

Coin Laundry provides data to vendors, consultants, marketing partners, research firms, and other service providers or business partners. These include:

- ❖ Payment processors and facilitators
- ❖ Cloud storage providers

- ❖ Marketing partners and marketing platform providers, including social media advertising services
- ❖ Data analytics providers
- ❖ Research partners, including those performing surveys or research projects in partnership with Coin Laundry or on Coin Laundry's behalf
- ❖ Vendors that assist Coin Laundry to enhance the safety and security of its apps
- ❖ Consultants, lawyers, accountants, and other professional service providers

### 3. For legal reasons or in the event of a dispute

Coin Laundry may share users' personal data if we believe it's required by applicable law, regulation, operating license or agreement, legal process or governmental request, or where the disclosure is otherwise appropriate due to safety or similar concerns. This includes sharing personal data with law enforcement officials, public health officials, other government authorities, or other third parties as necessary to enforce our Terms of Service, user agreements, or other policies; to protect Coin Laundry's rights or property or the rights, safety, or property of others; or in the event of a claim or dispute relating to the use of our services. If you use another person's credit card, we may be required by law to share your personal data, including order information, with the owner of that credit card.

### 4. With consent

Coin Laundry may share a user's personal data other than as described in this notice if we notify the user and they consent to the sharing.

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## **D. Data retention and deletion**

Coin Laundry retains user profile, transaction, and other personal data for as long as a user maintains their Coin Laundry account.

Coin Laundry may retain certain user data after receiving an account deletion request if necessary, such as to comply with legal requirements.

Coin Laundry may also retain certain information if necessary for purposes of safety, security, and fraud prevention. For example, if Coin Laundry deactivates a user's account because of unsafe behavior or security incidents, Coin Laundry may retain certain information about that account to prevent that user from opening a new Coin Laundry account in the future.

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## **F. Grounds for processing**

We only collect and use personal data where we have lawful grounds to do so. These include processing user personal data to provide requested services and features, for purposes of Coin Laundry's legitimate interests or those of other parties, to fulfill our legal obligations, or based on consent.

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We collect and use personal data only where we have one or more lawful grounds for doing so. Such grounds may vary depending on where our users are located, but generally include processing personal data:

a. To provide requested services and features: In order to provide our services, we must collect and use certain personal data. This includes:

- ❖ User profile data, which we use to establish and maintain user accounts; verify user identity; communicate with users about their orders, and accounts; and enable users to make payments or receive earnings
- ❖ Usage data, which is necessary to maintain, optimize, and enhance Coin Laundry's services, including to determine incentives & rewards points
- ❖ Transaction information
- ❖ Information relating to customer support

b. For purposes of the legitimate interests of Coin Laundry or other parties : This includes using personal data to maintain and enhance our users' safety and security. For example, we use personal data to prevent use of our services by users who have engaged in inappropriate or dangerous behavior, such as by retaining data of banned users to prevent their use of Coin Laundry's apps.

This also includes purposes such as combating fraud; improving our services, direct marketing, research, and development; and enforcing Coin Laundry's Terms of Service.

In addition, it includes using personal data to the extent necessary for the interests of other people or the general public, such as in connection with legal or insurance claims, and to protect the rights and safety of others.

c. To fulfill Coin Laundry's legal obligations: For example, Coin Laundry is subject to laws and regulations in many cities and countries that require it to collect and retain data about our users' orders, and to provide copies of such data to the government or other authorities. We collect and use personal data to comply with such laws.

Coin Laundry may also share data with law enforcement regarding criminal acts or threats to public safety, or requests by third parties pursuant to legal processes.

d. With consent: Coin Laundry may collect and use personal data based on the user's consent. For example, we may collect personal data through voluntary surveys. Responses to such surveys are collected on the basis of consent and will be deleted once no longer necessary for the purposes collected.

A user who has provided consent to a collection or use of their personal data can revoke it at any time. However, the user will not be able to use any service or feature that requires collection or use of that personal data.

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### III. Choice and transparency

Coin Laundry enables users to access and control the data that Coin Laundry collects, including through:

- ❖ In-app settings
- ❖ Device permissions
- ❖ In-app ratings pages
- ❖ Marketing opt-outs

Coin Laundry also enables users to request access to or copies of their data, changes or updates to their accounts, deletion of their accounts, or that Coin Laundry restrict its processing of user personal data.

#### A. Privacy settings

Settings menus in the Coin Laundry app for customer give them the ability to set or update their location-sharing preferences and their preferences for receiving mobile notifications from Coin Laundry. Information about these settings, how to set or change these settings, and the effect of turning off these settings is described below.

- ❖ Location data: Coin Laundry uses customer device location services to make it easier to get a service whenever they need one. Location data helps improve our services, including showing nearest outlet and nearest machine to use for washing & Drying and customer support.
- ❖ Notifications: Coin Laundry provides users with order status notifications and updates related to activity on their account. These notifications may be enabled or disabled through the Settings in the Coin Laundry app
- ❖ Notifications: discounts and news: Users may enable Coin Laundry to send push notifications about discounts and news from Coin Laundry. Push notifications may be enabled or disabled through the Settings in the Coin Laundry app.

#### B. Device permissions

Most mobile device platforms (iOS, Android, etc.) have defined certain types of device data that apps cannot access without the device owner's permission, and these platforms have different methods for how that permission can be obtained. iOS devices notify users the first time the Coin Laundry app requests permission to access certain types of data and gives users the option to grant or refuse permission. Android devices notify users of the permissions that the Coin Laundry app seeks before their first use of the app and use of the app constitutes a grant of such permission.

#### C. Ratings look-up

After every order, customer are able to rate about the service they received from coin laundry.



#### D. Marketing opt-outs

Users may opt out of receiving promotional emails from Coin Laundry here. Users may also opt out of receiving emails and other messages from Coin Laundry by following the unsubscribe instructions in those messages. We may still send users who have opted out non-promotional communications, such as receipts for orders or information about their account.

#### E. User data requests

Coin Laundry provides users with a variety of ways to learn about, control, and submit questions and comments about Coin Laundry's handling of their data. To make a request, please go [here](#).

- ❖ Accessing data: Users can ask for an explanation of the data we collect from them and how we use it.
- ❖ Receiving data: Users can ask for a copy of data that Coin Laundry collects from them with their consent or as necessary to provide our services.
- ❖ Changing or updating data: Users can edit the name, phone number, email address, payment method, and photo associated with their account through the Settings menu in Coin Laundry's apps. They may also ask that Coin Laundry change or update their data, including if they believe such data is inaccurate or incomplete.
- ❖ Deleting data: Users may request deletion of their account at any time through the in the coin laundry app
- ❖ Objections, restrictions, and complaints: Users may request that we stop using all or some of their personal data, or that we limit our use of their data. Coin Laundry may continue to process data after such objection or request to the extent required or permitted by law.

In addition, users may have the right to file a complaint relating to Coin Laundry's handling of their personal data with the data protection authority in Bangalore, India and its limited to local jurisdiction.

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## IV. Updates to this notice

We may occasionally update this notice. Use of our services after an update constitutes consent to the updated notice to the extent permitted by law.

We may occasionally update this notice. If we make significant changes, we will notify users in advance of the changes through the Coin Laundry apps or through other means, such as email. We encourage users to periodically review this notice for the latest information on our privacy practices.