

PieBooking Privacy Policy

Last Updated: February 2, 2022

This PieBooking privacy policy (the “Policy”) explains how personal data is collected from individual users or business entities (the “user”, “you” and “your”) through the online platform piebooking.com and the related software and services (collectively, the “Platform”), as well as how it is used and disclosed.

PieBooking is owned and operated by PIE SERVICES LLC, a Florida limited liability company, having a business address at 924 E 124th Ave #A, 33612 Tampa, Florida, USA (“we”, “us”, and “our”).

This Policy enters into force on the effective date indicated at the top of the Policy and remains valid until terminated or updated by us. The Policy may be changed from time to time to address the changes in laws, regulations, and industry standards. If we have your email address, we will send you a notification about the changes. Also, we encourage you to review our Policy regularly to stay informed. For significant material changes in the Policy or, where required by the applicable law, we may seek your consent.

Part I - Our Role as a Data Controller and a Data Processor

We act in the capacity of a data controller and a data processor with regard to the personal data processed through the Platform in terms of the applicable data protection laws, including the EU General Data Protection Regulation (GDPR). Our role depends on the specific situation in which personal data is handled by us, as explained in detail below:

- **Data controller.** We are responsible for the collection and use of your personal data through the Platform and we make decisions about the types of personal data that should be collected from you and purposes for which such personal data should be used. Therefore, we act as a **data controller** with regard to the personal data collected directly through the Platform (e.g., when you send us an inquiry or conclude a service contract). We comply with data controller’s obligations set forth in the applicable laws.
- **Data processor.** We act in the capacity of a **data processor** in situations when you submit information, client lists, files or generate data through the Platform for processing (“**Your Data**”) and Your Data contains your or other individuals’ personal data. We do not own, control, or make decisions about Your Data. We process Your Data only in accordance with the instructions issued by a respective data controller.

Part II - Personal Data We Collect

We collect your personal data in various ways when you use our Platform. We respect data minimization principles. Thus, we collect only a minimal amount of personal data through the Platform that is necessary to ensure the proper provision of the Platform as described below. We use your personal data for limited, specified and legitimate purposes explicitly mentioned in this Policy. We do not use your personal data for any purposes that are different from the purposes for which it was provided. We use your personal data to, among other things, provide you with the requested services, provide the functionality and improve the quality of our Platform and personalize your experience. Also, when processing personal data, we make sure that we do so by relying on one of the available legal bases. You can find more information about the legal bases below.

- **Registration of the User Account (subscribers).** When you register your user account on the Platform as a subscriber, we collect your first name, last name, email address, mobile phone number, and password. When you update your user account, we collect your first and last name, gender, birthdate, business address (including, city, state, country and postal code), email address, mobile phone number, and password. When you request us to enable

Point of Sale, we collect your bank account number, routing number, currency, nationality, and account type (US, UK, EU) to facilitate your application process with Payment Processor and for financial settlement between you and the Payment Processors. We use the said information to register and maintain your user account, enable your access to the Platform, provide you with the requested services, make and manage appointments, contact you, if necessary, and maintain our business records. The legal bases on which we rely are 'performing a contract with you' and 'pursuing our legitimate *business interests*' (i.e., operate, analyze, grow, and administer the Platform).

- **Registration of the User Account (clients).** When you register your account on the Platform as a client, we collect your first name, last name, birth date (optional), mobile phone number, and picture (optional). We use the said information to register and maintain your user account, enable your access to the Platform, provide you with the requested services, make appointments, contact you, if necessary, and maintain our business records. The legal bases on which we rely are '*performing a contract with you*' and '*pursuing our legitimate business interests*' (i.e., operate, analyze, grow, and administer the Platform).
- **Payment Data.** When you make or request a payment, you will be asked to provide your payment details like your name, credit or debit card number, expiration date, security code, billing address. Please note that we do not process payments - it is done by our third-party payment processors. Your payment data is used to process your payments and maintain our business records. The legal bases on which we rely are '*performing a contract*', '*pursuing our legitimate business interests*' (i.e., administer our business), and '*complying with our legal obligations*'. We do not store credit or debit card number or any other payment method. Our third-party payment processors store such data for the time period required by the applicable law.
- **Feedback and Reviews.** When you submit a feedback or review on the Platform, we collect your first name, last name, email address, phone number, and any information that you decide to provide in your review (for example, your picture). We use such information to feature your feedback or review, ensure security of the Platform, and maintain our business records. The legal bases on which we rely are '*performing a contract with you*', '*pursuing our legitimate business interests*' (i.e., operate and protect the Platform), and '*your consent*' (for optional personal data). We store such data as long as your feedback or review is available on the Platform.
- **Appointments.** When you book an appointment on the Platform, we collect your first name, last name, email address and/or mobile phone number. We use the said information to process your appointment request, contact you, if necessary, and maintain our business records. The legal bases on which we rely are '*performing a contract with you*' and '*pursuing our legitimate business interests*' (i.e., operate, analyze, grow, and administer the Platform). We store such data as long as we are required to store our business records.
- **Inquiries.** When you contact us by email or by using the "contact" functionality, we collect your name, email address, and any information that you decide to include in your message. We use such data to respond to your inquiries. The legal bases on which we rely are '*pursuing our legitimate business interests*' (i.e., to grow and promote our business) and '*your consent*' (for optional personal data). We store such data until you stop communicating with us.

We may also obtain information from other sources, such as third-party websites, applications, and services (each, a "Third-Party Platform"), through which you connect with our Platform and combine that with information we collect on our Platform. Please note that you may adjust the settings of the Third-Party Platform to control what personal data is

shared with us. We use such personal data for the purposes it is provided. For example, if you choose a Third-Party Platform to sign-up on the Platform, we will use the personal data received from the Third-Party Platform to register and maintain your user account and provide you with the requested services as described above.

When you visit our Platform, some information is automatically collected. For example, we may automatically collect your location, computer operating system, Internet Protocol (IP) address, access times, browser type and language, and the website you visited before our Platform. In most cases, such information is not considered to be personal data (except for your IP address), unless it is combined with your personal data. We use such information to analyze the technical aspects of your use of the Platform, prevent fraud and abuse of the Platform, ensure the security of the Platform, tailor the Platform for your location and preferences, understand you and your preferences, to enhance, personalize, and customize your experience and enjoyment using our Platform, products, and services. The legal basis on which we rely when processing such analytics data is 'pursuing our legitimate business interests' (i.e., to analyze and protect the Platform).

We also collect information about your usage and activity on our Platform using certain technologies, such as:

1. **Cookies.** We may automatically collect information using "cookies" and similar technology. Cookies are small data files that may have unique identifiers and reside, among other places, on your computer or mobile device, in emails we send to you, and on our web pages. Among other things, cookies help us improve our Platform and your experience. We use cookies to see which areas and features of our Platform are popular and to count visits to our Platform. We may access information contained in cookies placed on your device by a Third-Party Platform as permitted by the terms of your agreement and privacy settings with such Third-Party Platform. We may share this information with the Third-Party Platform for its use as permitted by the terms of your agreement and privacy settings with such Third-Party Platform. We use different types of cookies on the Platform, including:
 - **Essential technical cookies** that are strictly necessary to ensure the correct functioning of the Platform and provide the services requested by you;
 - **Marketing cookies** that allow us to create, implement, and examine our marketing campaigns. Such cookies allow us to reach the right customers, analyze the productivity of our marketing campaigns, and offer you personalized advertisement; and
 - **Statistics cookies** that allow us to generate statistical reports about how you use the Platform.
2. **Cookie Consent.** When you visit the Platform for the first time, we may ask you to provide us with your consent to our use of all cookies via a cookie consent banner. If you do not provide your opt-in consent, we will not serve you our non-essential cookies. Please note that we may not be able to provide you with the best possible user experience on the Platform if not all cookies are enabled. If you would like to refuse our use of non-essential cookies later, you can do it at any time by declining cookies in your browser or device.
3. **Web Beacons.** We may collect information using web beacons. Web beacons are electronic images that may be used on our Platform or in our emails. We use web beacons to deliver cookies, count visits, understand usage and campaign effectiveness, and tell whether you open an email and act upon it. The legal basis on which we rely when processing such data is 'pursuing our legitimate business interests' (i.e., to analyze the Platform).
4. **Do Not Track Signals.** We currently do not employ technology that recognizes "do-not-track" signals from your browser. We may engage third parties, such as marketing or analytics partners, who may collect information about your online activities over time and across different websites when you use our Platform.

If we combine your non-personal data with certain elements of your personal data and such a combination allows us to identify you as a natural person, we will handle such aggregated data as personal data and make sure that we have a legal basis for processing it. If your personal data is de-identified in a way that it can no longer be associated with a natural person, it will not be considered personal data and we may use it for any business purpose.

Part III - Our Communication with You

Newsletters and promotional offers. If we have your email address or you have subscribed to our newsletter, we may, from time to time, send you a newsletter informing you about the latest developments related to the Platform, contests, special offers, promotions, rewards, upcoming events, and other news about products and services offered by, discount codes, and other commercial information.

Opting-out. You may opt out of receiving promotional emails from us by following the instructions in those emails.

Tracking pixels. The newsletters sent by us may contain tracking pixels that allow us to conduct analysis of our marketing campaigns. Tracking pixels allow us to see whether you opened the newsletter and what links you have clicked on. We use such information to conduct analytics and pursue our legitimate business interests.

Service-related notices. If necessary, we will send you important informational messages, such as reservation confirmations, receipts, payment information, technical emails, and other administrative updates. Please note that such messages are sent on an “if-needed” basis and they do not fall within the scope of commercial communication that may require your prior consent. You cannot opt-out from service-related notices but you can adjust the setting of such notices through your user account.

Part IV - How We Share Your Personal Data

1. When you make an appointment through our Platform, your information is provided to us and to the Professional with whom you choose to make the appointment. In order to facilitate your appointment, your information is provided to that Professional, just as it would if you made an appointment by calling the Professional, emailing the Professional, or using the Professional's website. If you provide a mobile phone number, the Professional may send you text messages regarding your reservation. Some Professionals also require you to provide payment information to secure your appointment. We may share with Professionals the summary reports of feedback from Clients. We do not control the privacy practices of the Professional. Please contact the Professional directly if you want to learn about its privacy practices.
2. If you participate in the Rewards program, we notify the applicable Reward program administrator and provide it with certain related information about your purchase or redemption, including your name, email address, and the amount of the Reward.
3. Your personal data is disclosed to our service providers with whom we cooperate (our data processors). For example, we share your personal and non-personal data with entities that provide certain technical support services to us, such as hosting, analytics, and payment processing services. The disclosure is limited to the situations when your personal data is required for the following purposes: (i) ensuring the proper operation of the Platform and delivery of services ordered by you; (ii) providing you with the requested information; (iii) pursuing our legitimate business interests; (iv) enforcing our rights, preventing fraud, and security purposes; (v) carrying out our contractual obligations; or (vi) If you provide your prior consent to such a disclosure.
4. Our Platform may allow you to connect and share your actions, comments, posts, Content, and information publicly or with friends on Third-Party Platforms such as Facebook, Twitter or Instagram. Our Platform may also allow you to connect with us on, share on, and use Third-Party Platforms, including those on which we have a presence.

You should be aware that personal data which you voluntarily include and transmit online or in a publicly accessible blog, chat room, social media platform or otherwise online, or that you share in an open forum such as an in-person panel or survey, may be viewed and used by others without any restrictions. We are unable to control such uses of your personal data, and by using the Platform or any other online services you assume the risk that the personal data provided by you may be viewed and used by third parties for any number of purposes. If you connect to a Third-Party Platform through an icon or link on the Platform or otherwise link your account with a third-party service, we may share the contents of your post and associated information (such as your user name, the fact that your connection originated from the Platform, and other relevant usage and diagnostic information) with such third party. We may also send information about the content you watch and your activities on the Platform to such third parties. Please be mindful of your personal privacy needs and the privacy needs of others as you choose whom to connect with and what to share and make public. We cannot control the privacy or security of information you choose to make public or share with others. We also do not control the privacy practices of Third-Party Platforms. Please contact those sites and services directly if you want to learn about their privacy practices.

5. We may share personal data when you authorize us to share your personal data with other third parties (such as the Professionals at which you make appointments through our Platform) for their own marketing purposes, which are subject to the separate privacy policies of such third parties.
6. We may share aggregate statistical data for the improvement of services offered by our Platform.
7. We share personal data with third parties who provide services to us, such as data collection, reporting, ad response measurement, and site analytics, as well as assistance with delivery of relevant marketing messages and advertisements. These service providers will use your personal data for the purpose of evaluating your, and other users' use of the Platform, compiling reports for us on your activity on the Platform and providing other services relating to your activity on the Platform and Internet usage. These third parties may view, edit, or set their own cookies. We and our third-party service providers, advertisers, and/or partners may also place web beacons for these third parties. The use of these technologies by these third parties is subject to their own privacy policies and is not covered by this Policy.
8. We may disclose your personal data (i) to comply with laws and to respond to lawful requests and legal process, (ii) to protect our rights and property, as well as the rights and property of our agents and customers, and others, including to enforce our agreements, policies, and terms of use, and (iii) in an emergency to protect the safety of the Platform, our customers, or any person.
9. We may disclose or transfer your personal data to a third party if we sell, transfer, divest, or disclose all or a portion of our business or assets to another company in connection with or during negotiation of any merger, financing, acquisition, bankruptcy, dissolution, transaction, or proceeding.
10. We may also share aggregated or de-identified information with third parties in our discretion.
11. **Affiliates.** We cooperate with affiliate third parties that may have access to your personal data, such as your cookie data. We also share your personal information with the Affiliate that you chose during the sign-up process. We will disclose your personal data only if we have a legal basis for doing so (e.g., your consent to non-essential cookies if you are based in the EU).

Part V - International Transfers of Personal Data

Some of our data processors are located outside the country in which you reside. For example, if you reside in the European Economic Area (EEA), we may need to transfer your personal data to jurisdictions outside the EEA. In case it is necessary to make such a transfer, we will make sure that the jurisdiction in which the recipient third party is located guarantees an adequate level of protection for your personal data. We will not transfer your personal data internationally if no appropriate level of protection can be granted.

Part VI - Security of Your Personal Data

We take reasonable steps to help protect your personal data in an effort to prevent loss, misuse, unauthorized access, disclosure, alteration, and destruction. We have put in place reasonable physical, electronic, and managerial procedures to safeguard the information we collect. Only those employees who need access to your information in order to perform their duties are authorized to have access to your personal data. Our security measures include encryption, access control, secured networks, anonymisation of personal data and carefully selected data processors.

Nonetheless, we cannot guarantee that transmissions of your payment information or personal data will always be secure or that unauthorized third parties will never be able to defeat the security measures taken by us or our third-party service providers. To the highest extent permitted by the applicable law, we assume no liability for disclosure of your personal data due to errors in transmission, unauthorized third-party access, or other causes beyond our control. You play an important role in keeping your personal data secure. You should not share your user name, password, or other security information for your account with anyone.

When you provide us with any access credentials to third-party software or services for the purpose of using the full functionality of the Platform (for example, when you migrate your client lists and appointments), you have to make sure that those credentials belong to you and you do not breach any applicable laws by disclosing them to us. To the highest extent permitted by the applicable law, we assume no liability for disclosure of your access credentials due to errors in transmission, unauthorized third-party access, or other causes beyond our control.

Part VII - Your Rights

You have the right to control how your personal data is processed by us by exercising the rights listed below (unless, in very limited cases, the applicable law provides otherwise):

- **Right of access:** you can get a copy of your personal data that we store in our systems;
- **Right to rectification:** you can rectify inaccurate personal data that we hold about you;
- **Right to erasure ('right to be forgotten')**: you can ask us to erase your personal data from our systems;
- **Right to restriction:** you can ask us to restrict the processing of your personal data;
- **Right to object:** you can ask us to stop processing your personal data;
- **Right to withdraw consent:** you have the right to withdraw your consent, if you have provided one; or
- **Right to complaint:** you can submit your complaint regarding our processing of your personal data.

If you would like to exercise any of your rights, please contact us by email or by post (you can find our contact details at the end of this Policy) and explain your request in detail. In

order to verify the legitimacy of your request, we may ask you to provide us with an identifying piece of information that allows us to identify you in our system. We will answer your request within a reasonable time frame but no later than 30 days.

If you would like to launch a complaint about the way in which we process your personal data, we kindly ask you to contact us first and express your concerns. If we receive your complaint, we will investigate it and provide you with our response as soon as possible. If you are not satisfied with the outcome of your complaint, you have the right to lodge a complaint with your local data protection authority.

We do not discriminate against you if you decide to exercise your rights. It means that we will not: (i) deny any goods and services, (ii) charge you different prices, (iii) deny any discounts or benefits, (iv) impose penalties, or (v) provide you with a lower quality service.

If we get a request regarding the personal data included in Your Data, we will forward such a request to the respective controller. This is because we, as a data processor, do not accommodate data subjects' requests with regard to personal data that we process on behalf of our users.

Part VIII - Children

The Platform is not intended for use by children (i.e., persons who are minors in their country of residence). Therefore, we do not knowingly collect minors' personal data, unless parents or legal guardians decide to provide children's data to us. If you, as a parent or a legal guardian of a child, become aware that the child has submitted his/her personal data to us, please contact us immediately. We will delete your child's personal data from our systems without undue delay.

Part IX - Retention period

We store your personal data in our systems only for as long as such personal data is required for the purposes described in this Policy or until you request us to delete your personal data, whichever comes first. After your personal data is no longer necessary for its primary purposes and we do not have another legal basis for storing it, we securely delete your personal data from our systems.

We retain non-personal data pertaining to you for as long as necessary for the purposes described in this Policy. For example, we can store it for the period of time needed for us to pursue our legitimate business interests, conduct audits, comply with (and demonstrate compliance with) legal obligations, resolve disputes and enforce our agreements.

In certain cases, we are required by law to store your personal data for certain period of time (e.g., for business records or accountancy purposes). Thus, we keep your personal data for the time period stipulated by the applicable law and securely delete it as soon as the required storage period expires.

Part X - Contact Us

For questions about accessing, changing, deleting your personal data or the Policy, please contact our support at support@piebooking.com

If you wish to send us a letter by post, you can use the following address: 924 E 124th Ave #A, 33612 Tampa, Florida, USA.

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