

# Privacy Policy for LaundryConnect Mobile Application

**Effective Date: 20/10/2021**

## Section 1 - DEFINITIONS

a) **APPLICABLE MOBILE APPLICATION:** This Privacy Policy will refer to and be applicable to the LaundryConnect Mobile Application, which shall hereinafter be referred to as "Mobile App."

b) **EFFECTIVE DATE:** "Effective Date" means the date this Privacy Policy comes into force and effect.

c) **PARTIES:** The parties to this privacy policy are the following data controller: LaundryConnect ("Data Controller") and yourself, as the user of this Mobile App. Hereinafter, the parties will individually be referred to as "Party" and collectively as "Parties."

d) **DATA CONTROLLER:** The Data Controller is the publisher, owner, and operator of the Mobile App and is the Party responsible for the collection of information described herein. Data Controller shall be referred to either by Data Controller's name or "Data Controller," as listed above. If Data Controller or Data Controller's property shall be referred to through first-person pronouns, it shall be using the following: us, we, our, ours, etc.

e) **YOU:** Should you agree to this Privacy Policy and continue your use of the Mobile App, you will be referred to herein as either you, yourself, the user, or if any second-person pronouns are required and applicable, such pronouns as 'your', "yours", etc.

f) **SERVICES:** "Services" means any services that we make available for sale on the Mobile App.

g) **PERSONAL DATA:** "Personal Data" means personal data and information that we obtain from you in connection with your use of the Mobile App that can identify you in any manner.

## Section 2 - GENERAL INFORMATION

This privacy policy (hereinafter "Privacy Policy") describes how we collect and use the Personal Data that we receive about you, as well as your rights in relation to such Personal Data, when you visit our Mobile App or use our Services.

This Privacy Policy does not cover any information that we may receive about you through sources other than the use of our Mobile App. The Mobile App may link out to other websites or mobile applications, but this Privacy Policy does not and will not apply to any of those linked websites or applications, unless specifically stated otherwise.

We are committed to the protection of your privacy and Personal Data while you use our Mobile App.

By continuing to use our Mobile App, you acknowledge that you have had the opportunity to review and consider this Privacy Policy, and that you acknowledge that you agree to it and that you are bound by it. This means that you also consent to the use of your personal information and the method of disclosure, as described in this Privacy Policy. If you do not understand the Privacy Policy or do not agree thereto, you then agree to immediately cease your usage of our Mobile App.

## Section 3 - CONTACT AND DATA PROTECTION OFFICER

The Party responsible for the processing of your personal data is LaundryConnect. The Data Controller may be contacted as follows:

16 Pressburg Road  
Foundersview North  
Modderfontein  
South Africa  
1645

The Data Controller and operator of the Mobile App are one and the same. The Data Protection Officer is as follows: *Lihan Pretorius (Head of Legal and Commercial)*. The Data Protection Officer may be contacted as follows:

16 Pressburg Road  
Foundersview North  
Modderfontein  
South Africa  
1645

#### **Section 4 - LOCATION**

The location where the data processing activities take place is as follows:

16 Pressburg Road  
Foundersview North  
Modderfontein  
South Africa

#### **Section 5 - MODIFICATIONS AND REVISIONS**

We reserve the right to modify, revise, or otherwise amend this Privacy Policy at any time and in any manner whatsoever. If we do so, however, we will notify you and obtain your consent to the change or amendment in processing. Unless we specifically obtain your consent, any amendment to the Privacy Policy will only impact the information collected on or after the date of such amendment. It is also your responsibility to periodically check this page for any such modification, revision, or amendment.

#### **Section 6 - THE PERSONAL DATA WE RECEIVE FROM YOU**

Depending on how you use our Mobile App, you will be subject to different types of Personal Data collected and different ways of collection:

- a) **Registered users:** You, as a user of the Mobile App, may be asked to register to use the Mobile App or to purchase the Services available for sale. During the process of your registration or purchase, we will collect some or all of the following Personal Data from you through your voluntary disclosure: title, name, residential address, e-mail address, phone number, bank details and/or credit card number.

Personal Data may be asked for and in relation to:

- I) Interaction with our representatives in any way;
- II) Making purchases;
- III) Receiving notifications by text message or email about marketing;
- IV) Receiving general emails from us; or
- V) Commenting on our content or other user-generated content on our Mobile App, such as blogs, articles, photographs, or videos, or participating in our forums, bulletin boards, chat rooms or other similar features

By undergoing the registration- or purchase process, you consent to us collecting your Personal Data, including the Personal Data described in this section, as well as storing, using, or disclosing your Personal Data in accordance with this Privacy Policy.

- b) **Unregistered users:** If you are a passive user of the Mobile App and do not register for any purchases or other service, you may still be subject to certain passive data collection ("Passive Data Collection"). Such Passive Data Collection may include, through cookies and as described below, IP address information, location information, as well as certain browser data, such as history and/or session information.
- c) **All users:** The Passive Data Collection that applies to Unregistered users shall also apply to all other users and/or visitors of our Mobile App.
- d) **Sales & Billing Information:** To purchase any of the services on the Mobile App, you will be asked to provide certain credit information, billing address information, and possibly additional specific information, in order for you to be properly charged for your purchases. This payment and billing information will not be stored and will be used exclusively to assist with your one-time purchase.
- e) **E-mail Marketing:** You may be asked to provide certain Personal Data, such as your name and e-mail address, for the purpose of receiving e-mail marketing communications. This information will only be obtained through your voluntary disclosure, and you will be asked to affirmatively opt-in to e-mail marketing communications.
- f) **Content Interaction:** Our Mobile App may allow you to comment on the content that we provide or the content that other users provide, such as blogs, multimedia, or forum posts. If so, we may collect some Personal Data from you at that time, such as, but not limited to your username or e-mail address.

## Section 7 - THE PERSONAL DATA WE RECEIVE AUTOMATICALLY

**Cookies:** We may collect information from you through automatic tracking systems (such as information about your browsing preferences), as well as through information that you volunteer to us (such as information that you provide during a registration process or at other times while using the Mobile App, as described above). For example, we use cookies to make your browsing experience easier and more intuitive. Cookies are small strings of text used to store some information that may concern the user, his or her preferences or the device they are using to access the internet (such as a computer, tablet, or mobile phone). Cookies are mainly used to adapt the operation of the site to your expectations, offering a more personalized browsing experience and memorizing the choices you made previously. A cookie consists of a reduced set of data transferred to your browser from a web server and it can only be read by the server that made the transfer. This is non-executable code and does not transmit viruses. Cookies do not record or store any Personal Data. If you want, you can prevent the use of cookies, but then you may not be able to use our Mobile App as intended. To proceed without changing the options related to cookies, simply continue to use our Mobile App.

**Technical cookies:** Technical cookies, which can also sometimes be called HTML cookies, are used for navigation and to facilitate your access to and use of the site. They are necessary for the transmission of communications on the network or to supply services requested by you. The use of technical cookies allows the safe and efficient use of the site. You can manage or request the general deactivation or cancellation of cookies through your browser. If you do this though, please be advised this action might slow down or prevent access to some parts of the site. Cookies may also be retransmitted by an analytics or statistics provider to collect aggregated

information on the number of users and how they visit the Mobile App. These are also considered technical cookies when they operate as described. Temporary session cookies are deleted automatically at the end of the browsing session - these are mostly used to identify you and ensure that you don't have to log in each time - whereas permanent cookies remain active for longer.

**Third-party cookies:** We may also utilize third-party cookies, which are cookies sent by a third-party to your computer. Permanent cookies are often third-party cookies. Most third-party cookies consist of tracking cookies used to identify online behaviour, understand interests, and then customize advertising for users. Third-party analytical cookies may also be installed. They are sent from the domains of the third parties external to the site. Third-party analytical cookies are used to detect information on user behaviour on our Mobile App. This takes place anonymously in order to monitor the performance and improve the usability of the site. Third-party profiling cookies are used to create profiles relating to users, to propose advertising in line with the choices expressed by the users themselves.

**Profiling cookies:** We may also use profiling cookies, which are used to create profiles related to the user and then subsequently used to send advertising to the user's browser. When these types of cookies are used, we will require and obtain your explicit consent.

**Support in configuring your browser:** You can manage cookies through the settings of your browser on your device. However, deleting cookies from your browser may remove the preferences you have set for this Mobile App. For further information and support, you can also visit the specific help page of the web browser you are using:

- Internet Explorer: <http://windows.microsoft.com/en-us/windows-vista/block-or-allow-cookies>
- Firefox: <https://support.mozilla.org/en-us/kb/enable-and-disable-cookies-website-preferences>
- Safari: <http://www.apple.com/legal/privacy/>
- Chrome: <https://support.google.com/accounts/answer/61416?hl=en>
- Opera: <http://www.opera.com/help/tutorials/security/cookies/>

**Log Data:** Like all websites and mobile applications, this Mobile App also makes use of log files that store automatic information collected during user visits. The different types of log data could be as follows:

- internet protocol (IP) address;
- type of browser and device parameters used to connect to the Mobile App;
- name of the Internet Service Provider (ISP);
- date and time of visit;
- web page of origin of the user (referral) and exit; and
- the number of clicks.

The aforementioned information is processed in an automated form and collected in an exclusively aggregated manner to verify the correct functioning of the site, as well as for security reasons. This information will be processed according to the legitimate interests of the Data Controller.

For security purposes (spam filters, firewalls, virus detection), the automatically recorded data may also include Personal Data such as the IP address, which could be used, in accordance with applicable laws, to block attempts at damage to the Mobile App or damage to other users, or in the case of harmful activities or crime. Such data are never used for the identification or profiling of the user, but only for the protection of the Mobile App and our users. Such information will be treated according to the legitimate interests of the Data Controller.

## **Section 8 - THIRD PARTIES**

We may utilize third-party service providers ("Third-Party Service Providers"), from time to time or all the time, to assist in various ways with our Mobile App, and to help serve you.

We may use Third-Party Service Providers to assist with information storage (such as cloud storage).

We may provide some of your Personal Data to Third-Party Service Providers to help us track usage data, such as referral websites, dates, and times of page requests, etc. We use this information to understand patterns of usage of, and to improve, the Mobile App.

We may use Third-Party Service Providers to host the Mobile App. In this instance, the Third-Party Service Provider will have access to your Personal Data.

We may use Third-Party Service Providers to fulfil orders in relation to the Mobile App.

We may allow third parties to advertise on the Mobile App. These third parties may use cookies in connection with their advertisements (see the "Cookies" clause in this Privacy Policy).

Your Personal Data will not be sold or otherwise transferred to other third parties, apart from as disclosed in this Privacy Policy, without your approval.

Notwithstanding the other provisions of this Privacy Policy, we may provide your Personal Data to a third party or to third parties to protect the rights, property, or safety, of us, our customers or third parties, or as otherwise required by law.

We will not knowingly share your Personal Data with any third parties, other than in accordance with this Privacy Policy.

If your Personal Data might be provided to a third party in a manner that is other than as explained in this Privacy Policy, you will be notified accordingly.

In general, you may request that we do not share your Personal Data with third parties. If this is the case, kindly contact and inform us via e-mail. Please be advised that you may lose access to certain services, for which we rely on third-party providers.

## **Section 9 - HOW PERSONAL DATA IS STORED**

We use secure physical and digital systems to store your Personal Data, when appropriate. We ensure that your Personal Data is protected against unauthorized access, disclosure, or destruction.

Please note, however, that no system involving the transmission of information via the internet, or the electronic storage of data, is completely secure. We take the protection and storage of your Personal Data very seriously and, as such, we take all reasonable steps to protect your Personal Data.

Personal Data is stored throughout your relationship with us. We delete your Personal Data upon request for cancellation of your account or other general request for the deletion of data.

In the event of a breach of your Personal Data, you will be notified of such within a reasonable time frame. We undertake to follow all applicable laws and legislation regarding such breach.

## **Section 10 - PURPOSES OF PROCESSING OF PERSONAL DATA**

We primarily use your Personal Data to help us provide a better experience for you on our Mobile App and to provide you the services and/or information you may have requested, such as use of our Mobile App.

Information that does not identify you personally, but that may assist in providing us broad overviews of our customer base, will be used for market research or marketing efforts. Such information may include, but is not limited to, interests based on your cookies.

Personal Data that may be considering identifying, may be used for the following:

- a) Improving your personal user experience;
- b) Communicating with you about your user account with us;
- c) Marketing and advertising to you, including via email;
- d) Fulfilling your purchases; and/or
- e) Advising you about updates to the Mobile App or related Items.

## **Section 11 - DISCLOSURE OF PERSONAL DATA**

Although our policy is to maintain the privacy of your Personal Data as described herein, we may disclose your Personal Data if we believe that it is reasonable to do so in certain circumstances, in our sole and exclusive discretion. Such circumstances may include, but are not limited to:

- a) To satisfy any local, state, governmental or Federal laws or regulations;
- b) To respond to requests, such as discovery-, criminal-, civil-, or administrative process, subpoenas, court orders, or writs from law enforcement or other governmental or legal bodies;
- c) To bring legal action against a user who has violated the laws or the terms of use of our Mobile App;
- d) As may be necessary for the operation of our Mobile App;
- e) To generally cooperate with any lawful investigation about our users; or
- f) If we suspect any fraudulent activity on our Mobile App or if we have noticed any activity which may violate our terms or other applicable rules.

## **Section 12 - OPTING OUT OF TRANSMITTALS FROM US**

From time to time, we may send you informative- or marketing communications related to our Mobile App, such as announcements or other information. If you wish to opt-out of such communications, you may contact and notify us at the following email: [info@ls360.co.za](mailto:info@ls360.co.za). You may also click the opt-out link, which will be provided at the bottom end of all such communications.

Kindly be advised that, even though you may opt-out of such communications, you may still receive information from us that specifically relates to your use of our Mobile App or your account with us.

By providing any Personal Data to us, or by using our Mobile App in any manner whatsoever, you have created a commercial relationship with us. As such, you agree that any email sent from us or third-party affiliates, even unsolicited email, shall specifically not be considered SPAM, as that term is legally defined.

### **Section 13 - MODIFYING, DELETING, AND ACCESSING YOUR INFORMATION**

If you wish to modify or delete any information of yourself we may possess, or you wish to simply access any information we have about you, you may do so from your account settings page.

### **Section 14 - ACCEPTANCE OF RISK**

By continuing to use our Mobile App in any manner, or use the Product, you manifest your continuing assent to this Privacy Policy. You further acknowledge, agree, and accept that no transmission of information or data via the internet is completely secure, irrespective of the preventative steps taken. You acknowledge, agree, and accept that we do not guarantee or warrant the security of any information that you provide to us, and that you transmit such information at your own risk.

### **Section 15 - YOUR RIGHTS**

You have many rights in relation to your Personal Data. Specifically, your rights are as follows:

- the right to be informed about the processing of your Personal Data;
- the right to have access to your Personal Data;
- the right to update and/or correct your Personal Data;
- the right to portability of your Personal Data;
- the right to oppose or limit the processing of your Personal Data;
- the right to request that we stop processing and delete your Personal Data;
- the right to block any Personal Data processing in violation of any applicable law; and
- the right to launch a complaint with the relevant South African Ombud or -regulatory body, Federal Trade Commission (FTC) in the United States or applicable data protection authority in another or relevant jurisdiction.

Such rights can all be exercised by contacting us at the relevant contact information, as listed in section 16 below.

### **Section 16 - CONTACT INFORMATION**

If you have any questions or queries in relation to this Privacy Policy or the way we collect information from you, or if you would like to launch a complaint about anything related to this Privacy Policy, you may contact us at the following e-mail address: *info@ls360.co.za*.