



Privacy Notice - Last Updated 25/5/2020

General Information

This is the privacy notice of It's All Savvy Ltd.

We are company number 691859 registered in Ireland. Our registered office is at **The Mill Enterprise Hub, Newtown Link Road, Greenhills, Drogheda, LOUTH, Ireland, A92 CD3D**

By accessing or using the Services or any of our Apps or Websites, you agree to the terms of this Privacy Policy.

In this document, this is what we mean when we refer to:

"Its All Savvy", "Savvy", "we", "our", or "us" refer to It's All Savvy Ltd.

"Apps" means the product specific apps including but not limited to Savvy Pet Spa, Savvy Pet Carers, Savvy Vet Care, Savvy Groom School, Savvy Nails Spa, Savvy Glam, Savvy Hair, Savvy Studio, Savvy Trades and the Savvy Bookings and Savvy Customers apps. All related Savvy applications available on the Google Play Store or the Apple App Store;

"End User" means a customer and/or individual using any of our Apps;

"Partner" means a business owner who uses and of the the Savvy web applications or mobile apps to make bookings and engage with their customers;

"Privacy Policy" means this Privacy Policy which may be amended from time-to-time;

"Services" means any of the services we provide to Partners or individuals through our Apps and Websites; www.ItsAllSavvy.com, www.savvypetsoftware.com, www.savvyglam.com, www.savvytrades.com, www.savvystudio.com including all subdirectories, subdomains, and mobile sites thereof.

Introduction

This privacy notice aims to inform you about how we collect and process any information that we collect from you, or that you provide to us. It covers information that could identify you ("personal information") and information that could not. In the context of the law and this notice, "process" means collect, store, transfer, use or otherwise act on information. It tells you about your privacy rights and how the law protects you.

We are committed to protecting your privacy and the confidentiality of your personal information. Our policy is not just an exercise in complying with the law, but a continuation



of our respect for you and your personal information.

We undertake to preserve the confidentiality of all information you provide to us, and hope that you reciprocate.

Our policy complies with the Data Protection Act 2018 (Act) accordingly incorporating the EU General Data Protection Regulation (GDPR).

The law requires us to tell you about your rights and our obligations to you in regards to the processing and control of your personal data. We do this now, by requesting that you read the information provided at <http://www.knowyourprivacyrights.org>

Except as set out below, we do not share, or sell, or disclose to a third party, any information collected through our website or apps.

Links to Third Party Websites This Privacy Policy applies solely to the personal information collected by Its All Savvy and does not apply to third party websites.

Its All Savvy is not responsible for the privacy policies of third party websites.

Data Protection Officer

We have appointed a data protection officer (DPO) who is responsible for ensuring that our policy is followed.

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact our DPO, Lisa Gill at lisa@itsallsavvy.com.

Data we process

We may collect, use, store and transfer different kinds of personal data about you. We have collated these into groups as follows:

Your identity includes information such as first name, last name, title, and other identifiers that you may have provided at some time.

Your contact information includes information such as billing address, email address, telephone numbers and any other information you have given to us for the purpose of communication or meeting.

Your financial data includes information such as your bank account and payment card details.

Transaction data includes details about payments or communications to and from you and information about products and services you have purchased from us.

Technical data includes your internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.



Your profile includes information such as your username and password, purchases or orders made by you.

Marketing data includes your preferences in receiving marketing from us; communication preferences; responses and actions in relation to your use of our services.

We may aggregate anonymous data such as statistical or demographic data for any purpose. Anonymous data is data that does not identify you as an individual. Aggregated data may be derived from your personal data but is not considered personal information in law because it does not reveal your identity.

For example, we may aggregate profile data to assess interest in a product or service.

However, if we combine or connect aggregated data with your personal information so that it can identify you in any way, we treat the combined data as personal information and it will be used in accordance with this privacy notice.

If you do not provide personal information we need

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform that contract. In that case, we may have to stop providing a service to you. If so, we will notify you of this at the time.

Information we process because we have a contractual obligation with you

When you create an account on our website, buy a product or service from us, or otherwise agree to our terms and conditions, a contract is formed between you and us.

In order to carry out our obligations under that contract we must process the information you give us. Some of this information may be personal information.

We may use it in order to:

- verify your identity for security purposes
- sell products to you
- provide you with our services
- provide you with suggestions and advice on products, services and how to obtain the most from using our website

We process this information on the basis there is a contract between us, or that you have requested we use the information before we enter into a legal contract.

We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.



Information we process with your consent

Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website or ask us to provide you more information about our business, including our products and services, you provide your consent to us to process information that may be personal information.

Wherever possible, we aim to obtain your explicit consent to process this information, for example, by asking you to agree to our use of cookies.

We continue to process your information on this basis until you withdraw your consent or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by instructing us help@itsallsavvy.com. However, if you do so, you may not be able to use our website or our services further.

Information we process for the purposes of legitimate interests

We may process information on the basis there is a legitimate interest, either to you or to us, of doing so.

Where we process your information on this basis, we do after having given careful consideration to:

- whether the same objective could be achieved through other means
- whether processing (or not processing) might cause you harm
- whether you would expect us to process your data, and whether you would, in the round, consider it reasonable to do so.

For example, we may process your data on this basis for the purposes of:

- record-keeping for the proper and necessary administration of our business
- responding to unsolicited communication from you to which we believe you would expect a response
- protecting and asserting the legal rights of any party
- insuring against or obtaining professional advice that is required to manage business risk
- protecting your interests where we believe we have a duty to do so

Information we process because we have a legal obligation



Sometimes, we must process your information in order to comply with a statutory obligation.

For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order.

This may include your personal information.

Information provided on the understanding that it will be shared with a third party

Our website and social media platforms allow you to post information with a view to that information being read, copied, downloaded, or used by other people.

Examples include:

- posting a message on our social media platforms
- tagging an image
- clicking on an icon next to another visitor's message to convey your agreement, disagreement or thanks

In posting personal information, it is up to you to satisfy yourself about the privacy level of every person who might use it.

We do store this information, and we reserve a right to use it in the future in any way we decide.

Once your information enters the public domain, we have no control over what any individual third party may do with it. We accept no responsibility for their actions at any time.

Provided your request is reasonable and there is no legal basis for us to retain it, then at our discretion we may agree to your request to delete personal information that you have posted. You can make a request by contacting us at help@itsallsavvy.com.

Complaints regarding content on our website or social media platforms

We attempt to moderate user generated content, but we are not always able to do so as soon as that content is published.

If you complain about any of the content on our website or social media platforms, we shall investigate your complaint. If we feel it is justified or if we believe the law requires us to do so, we shall remove the content while we investigate.

Free speech is a fundamental right, so we have to make a judgment as to whose right will be obstructed: yours, or that of the person who posted the content that offends you.



If we think your complaint is vexatious or without any basis, we shall not correspond with you about it.

Credit reference

To assist in combating fraud, we may share information with credit reference agencies, so far as it relates to clients or customers who instruct their credit card issuer to cancel payment to us without having first provided an acceptable reason to us and given us the opportunity to refund their money.

Communicating with us

When you contact us, whether by telephone, through our live chat, website, social media or by e-mail, we collect the data you have given to us in order to reply with the information you need.

We record your request and our reply in order to increase the efficiency of our business.

We keep personally identifiable information associated with your message, such as your name and email address so as to be able to track our communications with you to provide a high quality service.

Your Rights

You have certain rights by law:

- where your personal information is processed on the basis of consent, the right to withdraw that consent;
- the right to confirmation as to whether or not we are holding any of your personal information and, if we are, to obtain a copy of it;
- the right to have certain information provided to you in a portable electronic format (where technically feasible);
- the right to have inaccurate personal information rectified;
- the right to object to your personal information being used for marketing or profiling, or on the basis of our or a third party's legitimate interests;
- the right to restrict how your personal information is used; and
- the right to be forgotten, which allows you to have your personal information erased in certain circumstances (though this is not an absolute right and may not apply if we need to continue using it for a lawful reason).



Privacy Notice For Partners & End Users

Use of information we collect through automated systems when you visit our website

When you use our Services, we collect information that your browser sends to us that is called log data, which may include information such as your computer's Internet Protocol ("IP") address, browser version, pages of our Service that you visit, the time and date of your visit, the time spent on those pages, and other statistics.

Information you provide to us when creating an account

When you create an account using either of our Apps or Websites, you provide us with personal information, including your name, e-mail address, postal address, a password, the name of your business (if you are a Partner) and your phone number (if your device has one). We also collect demographic information such as your birth date, age, gender and lifestyle. If you give us permission to do so, we may also collect information about your social media presence, including your usernames.

Information we collect as you use our Services.

Apps and Browsers We collect information about your device when you download and install one of our Apps, and about your browser when you visit either of our Websites. The information we collect includes:

- how you found our Website: including but not limited to whether you discovered us through a search engine, a partner website, an ad campaign, or email campaign;
- technical information: your IP address, device type, language and region settings, and other details about how you interact with our Apps and Website; and
- location information: if you have activated one of our Apps and permitted your mobile or other location-aware device to transmit location data, we will collect this automatically. This may include country, province, city, or neighbourhood information.

When Using Our Services as an End User

We may collect the following information about you

- areas of interest: including the types of Partner offerings that interest you;
- referrals: information about friends who referred you, or who you have referred to Its All Savvy;
- correspondence: copies of correspondence, text, email and other communications you have with us or with Partners via the Apps;
- participation: we will collect and retain the comments you make to the forums, bulletin boards, discussion groups, chat rooms, reviews, or other methods of communication that may be offered, including those you make on our social media pages;
- transaction details: information about how you interact with the Its All Savvy app, such as Partner offerings you view, purchase, redeem, and/or post, and the Partners you add to your favourites page; and



- financial account information: we collect minimal financial information as needed for our payment processing partners in order to provide payments functionality to our Partners (such as your credit or debit card number, expiration date, and card verification number). This information is held securely by our reputable payment processing partners and It's All Savvy or any of its employees do not have access to it.

We may collect information from you about someone else. If you provide Its All Savvy with personal information about someone else, for example when making a booking, you must ensure that you are authorised to disclose that information to Its All Savvy and that, without Its All Savvy taking any further steps required by applicable data protection or privacy law. Its All Savvy may collect, use and disclose such information for the purposes described in this Policy.

If Its All Savvy has been given personal information about you by another user and you would not like us to retain it, please contact us at hello@itsallsavvy.com

We may use personal information held about you as an End User in order to:

- provide you with offers for products and services from participating Partners, including offers based on variables such as stated and anticipated customer interests, personal characteristics, or location;
- recommend certain Partners offerings to you (e.g., to suggest Partners to add to your favourites page or remind you when it's time to rebook a service);
- facilitate and fulfil requests for appointments for Partner offerings, including their purchase and redemption;
- evaluate eligibility of customers for certain offers, products or services, and evaluate the types of offers, products or services that may be of interest to End users;
- track redemption of Partner offerings and perform other analytics;
- improve our Services, including performing analysis, tracking your use of the Services for the purposes of displaying advertising and content;
- provide customer support, including to our Partners;
- communicate and provide additional information that may be of interest to you or Partner clients about Its All Savvy the Savvy Software platforms and our Partners
- send you reminders, technical notices, updates, security alerts and support and administrative messages;
- to notify Partners where you have purchased services from a Partner through Its All Savvy, or participated in an offer, contest or other activity sponsored or offered through Its All Savvy on behalf of the Partner.
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- manage our everyday business needs such as administration of the Services, forum management, fulfilment, analytics, fraud prevention, enforcement of our corporate reporting obligations, terms of use, or to comply with the law.



When Using Our Services as a Partner

We may collect the following details about you:

- bank details: in order to submit payments to you, we need to collect your bank account and sort code;
- business related information: your business name, a description of your business, titles, names of your staff members;
- availability and scheduling information: information about your business calendars and staff availability from your Savvy account;
- social media information: information from your Facebook page, Twitter feed, LinkedIn profile, and
- customer information: where you upload your customer database to our servers, we will retain the personal information it contains subject to our Data Retention Policy. We will not share that personal information with any other Its All Savvy account holders.
- Payment information for your Its All Savvy subscription is never taken by us or transferred to us either through our website or otherwise. Our employees and contractors do not have access to it.
- At the point of payment, you are transferred to a secure page on the website of Stripe or other reputable payment service provider. That page may be branded to look like a page on our website, but it is not controlled by us.
- We hold information relating to the amount and frequency of your payments, but we do not hold details relating to your bank account or debit/credit card.

We may use personal information held about you as a partner as follows:

- to affiliated companies (e.g., subsidiaries and other companies owned by or controlled by Its All Savvy);
- to service providers that are hired by us to provide administrative and communication services on our behalf, such as website hosting, the processing and delivery of mailings, providing customer support, or providing credit card processing services;
- to business partners and other advertisers as part of an offer, contest, distribution partnership, or other activity that is provided by or in conjunction with Its All Savvy and its business partners and in which you have elected to participate.
- to third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets.
- Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal information in the same way as set out in this policy; and
- we may feed Partner information to third party websites (excluding customer lists), which may result in Partner information appearing in search engine results; and such results may include a corresponding link to schedule an appointment through Savvy Bookings;

We may use aggregated non-personally identifiable data to:

- assist us to better understand how our customers are using the Services,
- provide our customers with further information regarding the uses and benefits of the Services, • enhance small business productivity, including by creating useful business



insights from that aggregated data and allowing you to benchmark your business's performance against that aggregated data, and

- otherwise to improve the Services.

Cookies, Pixel Tags, and Other Web Beacons

Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit any website. They allow information gathered on one web page to be stored until it is needed for use on another, allowing a website to provide you with a personalised experience and the website owner with statistics about how you use the website so that it can be improved.

Pixel tags and web beacons are tiny graphic images placed on website pages or in our emails that allow us to determine whether you have performed specific actions. These tools allow us to measure response to our communications and improve our web pages and promotions.

Some cookies may last for a defined period of time, such as one day or until you close your browser. Others last indefinitely. Your web browser should allow you to delete any you choose. It also should allow you to prevent or limit their use.

Our website uses cookies. They are placed by software that operates on our servers, and by software operated by third parties whose services we use.

When you first visit our website, we ask you whether you wish us to use cookies. If you choose not to accept them, we shall not use them for your visit except to record that you have not consented to their use for any other purpose.

If you choose not to use cookies or you prevent their use through your browser settings, you will not be able to use all the functionality of our website.

We use cookies in the following ways:

- to track how you use our website
- to record whether you have seen specific messages we display on our website
- to keep you signed in our site
- to record your answers to surveys and questionnaires on our site while you complete them
- to record the conversation thread during a live chat with our support team

Personal identifiers from your browsing activity

Requests by your web browser to our servers for web pages and other content on our website are recorded.

We record information such as your geographical location, your Internet service provider and



your IP address. We also record information about the software you are using to browse our website, such as the type of computer or device and the screen resolution.

We use this information in aggregate to assess the popularity of the webpages on our website and how we perform in providing content to you.

If combined with other information we know about you from previous visits, the data possibly could be used to identify you personally, even if you are not signed in to our website.

Our use of re-marketing

Re-marketing involves placing a cookie on your computer when you browse our website in order to be able to serve to you an advert for our products or services when you visit some other website.

We may use a third party to provide us with re-marketing services from time to time. If so, then if you have consented to our use of cookies, you may see advertisements for our products and services on other websites.

Google Analytics

Our Websites use Google Analytics to show relevant adverts to users who have previously visited us as they browse the web. This enables us to tailor our marketing to better suit your needs and only display ads that are relevant to you.

You may see Its All Savvy, one of our software platforms or one of our Partners in search results pages (using Google Adwords), on YouTube, in banner adverts on Gmail and on other services run by Google. Any information collected will be used in accordance with our own privacy policy and Google's privacy policy.

If you do not wish to see ads, you can:

- opt out of Google's use of cookies through Google's Ads Settings
- refuse the use of cookies by downloading and installing Google Analytics Opt-out Browser Add-on.

Facebook Remarketing

We also use similar targeted advertising technology to ensure that we only serve people with adverts on their Facebook pages that are relevant to them. To enable us to do this, we include a Facebook Pixel. The information collected will be used in accordance with our own privacy policy, as well as Facebook's privacy policies.

Using the Facebook Pixel, we can also remarket adverts to you through Instagram.



You can set preferences for how Facebook advertises to you using your Facebook ad preferences.

Opting Out of Cookies You can refuse to accept some or all cookies by modifying settings within your browser. For guidance on how to do this, please visit <http://www.aboutcookies.org>.

If you block strictly necessary cookies, you may be unable to access certain parts of our Websites.

Disclosure and sharing of your information

Third party advertising on our social media platforms

Third parties may advertise on our social media platforms. In doing so, those parties, their agents or other companies working for them may use technology that automatically collects information about you when their advertisement is displayed on our social media platforms.

They may also use other technology such as cookies or JavaScript to personalise the content of, and to measure the performance of their adverts.

We do not have control over these technologies or the data that these parties obtain. Accordingly, this privacy notice does not cover the information practices of these third parties.

Data may be processed outside the European Union

Our websites are hosted in the United Kingdom and Ireland and in other countries where we target our business activities.

We may also use outsourced services in countries outside the European Union from time to time in other aspects of our business.

Accordingly data obtained within Ireland or the UK or any other country could be processed outside the European Union. We use the following safeguards with respect to data transferred outside the European Union:

- the processor abides by the same binding corporate rules regarding data processing as we do.
- the data protection clauses in our contracts with data processors include transfer clauses written by or approved by a supervisory authority in the European Union.
- we comply with a code of conduct approved by a supervisory authority in the European Union.



- we are certified under an approved certification mechanism as provided
- both our organisation and the processor are public authorities between whom there is either a legally binding agreement or administrative arrangements approved by a supervisory authority in the European Union relating to protection of your information.

Control over your own information

Your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes.

Access to your personal information

At any time you may review or update personally identifiable information that we hold about you, by contacting us at help@itsallsavvy.com.

Removal of your information

If you wish us to remove personally identifiable information we hold about you, you should contact us to make your request. This may limit the service we can provide to you. Its All Savvy will store personal data as long as Partner accounts continue to use our software, and for a period of not more than 24 months thereafter. Users may elect to have their data removed from Its All Savvy either by contacting the Partner directly or by contacting hello@itsallsavvy.com

In the case that a Partner gives written intention to cease to use our software, information stored with their account shall be encrypted and/or removed.

Storage and Retention

Our data is hosted and stored within the Dublin (Ireland) and London (UK)

When necessary, the information that we collect from you may also be processed by staff operating outside the United Kingdom or the European Economic Area (EEA) who work for us or for one of our partners.

Whenever data is transferred outside of the UK or EEA, we will take all steps reasonably necessary to ensure that any transferred personal information is treated securely and in accordance with applicable data protection laws.



Verification of your information

When we receive any request to access, edit or delete personal identifiable information we shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

Other matters

Use of site by children

We do not sell products or provide services for purchase by children, nor do we market to children.

If you are under 18, you may use our website only with consent from a parent or guardian

Job application and employment

If you send us information in connection with a job application, we may keep it for up to three years in case we decide to contact you at a later date.

If we employ you, we collect information about you and your work from time to time throughout the period of your employment. This information will be used only for purposes directly relevant to your employment. After your employment has ended, we will keep your file for six years before destroying or deleting it.

Encryption of data sent between us

We use Secure Sockets Layer (SSL) certificates to verify our identity to your browser and to encrypt any data you give us.

Whenever information is transferred between us, you can check that it is done so using SSL by looking for a closed padlock symbol or other trust mark in your browser's URL bar or toolbar.



How you can complain

If you are not happy with our privacy policy or if you have any complaints then you should tell us. If a dispute is not settled then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration.

If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Information Commissioner's Office (ICO). This can be done at <https://ico.org.uk/make-a-complaint/>. We would, however, appreciate the opportunity to talk to you about your concern before you approach the ICO.

Complaining

When we receive a complaint, we record all the information you have given to us. We use that information to resolve your complaint.

If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion as to whether we do give information, and if we do, what that information is.

We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.

Retention period for personal data

Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us:

- to provide you with the services you have requested;
- to comply with other law, including for the period demanded by our tax authorities;
- to support a claim or defence in court.

Compliance with the law

Our privacy policy has been compiled so as to comply with the law of every country or legal jurisdiction in which we aim to do business. If you think it fails to satisfy the law of your jurisdiction, we should like to hear from you.

However, ultimately it is your choice as to whether you wish to use our websites, apps, social media platforms or software product.



Review of this privacy policy

We may update this privacy notice from time to time as necessary. The terms that apply to you are those posted here on our website on the day you use our website. We advise you to print a copy for your records.

If you have any question regarding our privacy policy, please contact us at hello@itsallsavvy.com