

Valid from 1 December 2018

**TLC TECHNOLOGIES LIMITED**

**trading as SURESITTER**

**(the "Company")**

**PRIVACY POLICY**



Clerkin Lynch  
Solicitors  
30 Molesworth Street  
Dublin 2

At SureSitter we take your privacy very seriously. This Privacy Policy explains how we collect, use, share, and protect your Personal Information. If you do not want us to handle your Personal Information in this manner, please do not use the Platform. This privacy policy is organised into the following sections:

1. General
2. Changes to Privacy Policy
3. Information collected
4. Use of information by the company
5. Disclosure of information you provide or we collect
6. Use of cookies
7. Information security
8. Data integrity
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## 1. GENERAL

1.1 For the purposes of this Privacy Policy, the following words and expressions shall have the following meanings:-

**“Company”** means TLC Technologies Limited trading as SureSitter a private company limited by shares and incorporated in Ireland having Registered Number 607011, whose Registered Office is at 64 Oaklands Park, Sandymount, Dublin 4;

**“Non-Personal Information”** means information which cannot be used to identify or contact Users;

**“Personal Information”** means information that identifies Users or can be used to identify or contact Users;

**“Privacy Policy”** means this privacy policy, as may be amended from time to time;

**“Terms and Conditions”** means the Company’s terms and conditions of service contained on the Company’s Platform, as may be amended from time to time;

**“User”** means any person who uses the Platform, including any person acting under a person’s username and password;

**“Services”** means any services offered on the Platform, including but not limited to babysitting of children, childminding, aupairs and child day care;

**“Platform”** means the online information service Platform known as [SureSitter.com](https://www.SureSitter.com), which may link to other related Platforms or mobile applications.

1.1 The Company respects your right to privacy and is committed to complying with its obligations under both the Data Protection Acts 1988 and 2003 and the EU General Data Protection Regulation 2018. The Company has prepared this Privacy Policy to describe the manner in which it collects, uses, discloses and otherwise manages Personal Information in connection with the Software. The Company will only process Personal Information in accordance with the Data Protection Acts 1998 – 2003 and the EU General Data Protection Regulation 2018 and any Personal Information will be controlled by the Company.

1.2 Please read this Privacy Policy carefully. By continuing to access and use the Platform and/or Software, Users are deemed to have understood and agreed to the terms of this Privacy Policy in respect of the information collected about them via the Platform. If a User does not accept the terms of the Privacy Policy, that User should not access or use the Platform or the Software.

## **2. CHANGES TO PRIVACY POLICY**

The Company may amend this Privacy Policy periodically to reflect changes to its Personal Information practices. Any amended Privacy Policy shall be effective upon the date of publication by the Company. By accessing and using the Platform or the Software, Users are accepting that they are bound by the current Privacy Policy. Please check the Privacy Policy regularly to ensure that you are aware of the prevailing terms of the Privacy Policy,

### **3. INFORMATION COLLECTED**

3.1 Users may be asked to provide their Personal Information anytime the User is in contact with the Company, an affiliated company, or the Platform with the User's consent or the User may provide the Company with information via the User's Facebook or other social media account. Should any User create an account on the Platform, purchase the Service, register to purchase the Service, request information on the Service or request a trial of the Service the Company collects and retains two types of information:

3.1.1 Personal Information, which is information including, not limited to a User's name, address, date of birth, email address, telephone number, details of the User's children or dependants, and credit card details. With the consent of the User, the Company may also retain information including details obtained from the User's social network and details of any schools/sports groups/other groups with which the User have a connection. This information is provided by Users on a voluntary basis and includes photographs and videos which the User may provide to the Company or to other Users in connection with the User's registration for and use of the Services; and

3.1.2 Non-Personal Information which is analytical and statistical data gathered by the Company to monitor how the Services or the Platform is used and it includes, for example, information about Users' devices.

3.2 The Company may combine information that it collects or receives through the Services or the Platform with information which the Company may receive from other sources and use it pursuant to the terms of this Privacy Policy.

3.3 The Company may aggregate or de-identify any information which it collects to limit or prevent identification of any particular User or device. The Company is entitled to use this redacted information as it wishes without restriction and may disclose it to third parties.

3.4 The Company may automatically collect certain information about your use of the Service or the Platform including when you use the Service or Platform without logging in. The Company may collect information about the computer or device you use to access the Platform and the Company may, by way of example and without limitation,

collect information such as IP addresses, geo-locations, unique device identifiers, device attributes, usage data and transactional data.

- 3.5 All of the Platform's financial transactions are handled through our payment services providers, Stripe. You can review the Stripe privacy policy at <https://stripe.com/ie>. We will share information with Stripe only to the extent necessary for the purposes of processing payment you make via our Platform, refunding such payments and dealing with complaints and queries relating to such payments and refunds.

#### **4. USE OF INFORMATION BY THE COMPANY**

- 4.1 When Users register with the Platform, the Company may save the details that Users input and use them to personalise the service it offers to them. In these circumstances, the User may be asked to register with information including but limited to, their name, email address, company name, location and phone number, details of the User's children or dependants, and credit card details. With the consent of the User, the Company may also request information including details obtained from the User's social network and details of any schools/sports groups/other groups that the User have a connection with. This registration information is used to provide and otherwise administer the Platform, including the provision of tailored advertisements, notifications and other offers from the Company or its marketing partners while they are logged onto the Platform.
- 4.2 When Users register to use the Platform, they may also sign up to receive the Company's email newsletter, SMS text messages or other communications. When Users subscribe to the Company's newsletter, SMS text messages or other communications, the Company will use their email address or phone number to send them information about the Platform and service offerings which the Company thinks may be of interest to particular Users. Users may remove themselves from the Company's newsletter list by clicking the "*unsubscribe*" link that appears at the bottom of each of the Company's emails. If Users have signed up to receive SMS text messages, they may unsubscribe by following the opt-out instructions provided in their SMS text message.
- 4.3 From time to time the Company may offer Users the opportunity to participate in surveys or other customer research. The Company uses this information to help it understand its customers, enhance the Platform and the Software and the services it

offers, help the members provide more personalised services to the Users and to support its own marketing and promotion efforts.

- 4.4 When Users send email or other communications, the Company may use and retain those communications in order to process the Users' inquiries, respond to the Users' requests and improve the Platform and the Software.
- 4.5 At the time Users register on the Platform, the Company may obtain the User's consent to send it future promotional communications and information on ancillary services offered by the Company or our business partners. If a link is jointly sponsored by the Company and one or more sponsor, Users' Personal Information may be shared with such sponsors, as specified at the time of collection of your Personal Information. The Company does not control the use, disclosure or security of Users' Personal Information by other sponsors and recommend Users to review their respective privacy notices or statements.

## **5. DISCLOSURE OF INFORMATION YOU PROVIDE OR WE COLLECT**

- 5.1 The Company will retain access to all Personal Information and Non - Personal Information (the "**Data**") that it has collected about Users.
- 5.2 The Company will not disclose, trade, rent, sell or otherwise transfer Data without Users' consent, except as set out below.
- 5.3 If a User has consented upon or subsequent to registration on the Platform, the Company may provide any of the Data it collects to carefully screened third parties to contact that User in relation to products or services that the Company thinks may be of interest to that User. If that User later wishes to opt not to be contacted by these third parties in the future, that User should email the Company at the email address set out below.
- 5.4 The Company may transfer, or otherwise make available, Users' Data to its affiliates and/or other third parties who assist it with providing the Platform's services. Users' Data may be maintained and processed by our affiliates and other third party service providers in Ireland and other jurisdictions. The Company's service providers are given the information they need to perform their designated functions and the Company does not authorise them to use or disclose Data for their own purposes. For additional

information about the Company's service providers, Users should email the Company at the email address provided below.

- 5.5 From time to time, the Company may use third party analytics services to help understand the Users' use of its Platform. These third party analytics are used to collect data when Users visit the Platform or use the Service and analyses this information so that the Company can improve its services, Platform or Service. Information which is analysed in this way includes, but is not limited to, the number of unique users who visit the Platform, the demographic breakdown of our community users of the Platform or the activities that users engage in while on the Platform. If a User would like to opt-out of having this information collected and analysed by the Company's third party analytics, that User should contact the Company at the email address provided below.
- 5.6 The Company may transfer, or otherwise make available, any information it has about the Users as an asset in connection with a merger or sale, including transfers made as part of liquidation, receivership, insolvency or bankruptcy proceedings, provided that the entity to whom the information is transferred to confirms that it will adhere to the terms of this Privacy Policy as amended from time to time and provided that Data is only used for the purpose that the Users provided it to the Company.
- 5.7 The Company and its subsidiaries, may provide the Users' Data in response to a summons, court or regulatory order, statutory instrument or other legally valid inquiry or order or to an investigative body in the case of a breach of an agreement or contravention of law, or as otherwise required by applicable Irish or other law. The Company may also disclose Data where necessary for the establishment, exercise of defence of legal claims and as otherwise permitted by law.
- 5.8 When the Users purchase the Service, they may be presented with links to Platforms that the Company does not own or operate. Except as provided herein, the Company will not provide any of the Users' Data to these third parties without the Users' consent. The Company may provide links to third party Platforms as a convenience to the Users. Any such links are not intended as an endorsement of or referral to the linked Platforms. Any linked Platforms have separate and independent privacy policies, notices and terms of use, which the Company recommends the Users read carefully. The Company does not have any control over such Platforms and therefore

has no responsibility or liability for the manner in which the organisations that operate such linked Platforms may collect, use or disclose, secure and otherwise treat the Users' Data.

- 5.9 As part of our drive to ensure the highest level of customer satisfaction the Company may review details of your account history and usage patterns in aggregate and anonymous form to assist in identifying overall customer trends and preferences. We may also look at your specific usage patterns so that we can provide you with marketing information which is more tailored to your individual preferences.
- 5.10 From time to time, we may use your personal information to send important notices, such as communications about purchases and changes to our terms, conditions, and policies.
- 5.11 We may also use personal information for internal purposes such as auditing, data analysis, and research.

## **6. USE OF COOKIES**

- 6.1 A cookie is an element of data that Platforms can send to the Users' browsers which may then be stored on the Users' devices so that the Company may recognise the Users when they return to the Platform.
- 6.2 The Company uses cookies to collect information about the Users' use of the Platform, including operating system details, the time and duration of visits and IP addresses. The information collected by cookies enables the Company to understand the use of the Platform, including the number of users it has, the pages viewed per session and time exposed to particular pages. This in turn helps to provide the Users with a better experience. The Company does not attempt to personally identify the Users from their IP addresses.
- 6.3 Please note that the cookies exist to enable the Company to improve the functionality of the Platform and not for advertising purposes. Cookies do not in any way compromise the security of your computer. If Users do not wish for these cookies to be tracked, they can disable them in their browser. However, if Users decide not to accept cookies from the Company, they may not be able to take advantage of all the features of the Platform.

6.4 The Company and other third parties may also use cookies and similar technologies to provide Users with advertisements and promotions when they use the Platform. The information collected by these third parties may be used to tailor advertisements the Users see both on the Platform and on third party Platforms. Users can opt out of receiving tailored advertising from third parties through their browser's ads preference manager. If Users opt out of receiving tailored advertising from a third party you may still see advertisements from the Company but those advertisements will not be customised by the companies that you opt-out of.

## **7. INFORMATION SECURITY**

The Company has implemented reasonable administrative, technical and physical safeguards in an effort to protect against unauthorised access, use, modification and disclosure of Data in our custody and control. Unfortunately, no collection or transmission of information over the Internet or other publicly accessible communications networks can be guaranteed to be 100 per cent secure and therefore, the Company cannot ensure or warrant the security of any such information and specifically excludes any liability in contract or tort for any and all losses which may be suffered by Users in respect of any data breach or use of the Platform or Service.

All electronic transactions entered into via the Platform will be protected by encryption technology (SSL - Secure Socket Layer). The Company does not store credit card details nor does the Company share User details with any 3rd parties.

The User is at all times responsible for keeping it's password and other login details confidential.

## **8. DATA INTEGRITY**

8.1 The Company takes reasonable steps to ensure that the Data it processes is accurate, complete and current however Users must update or correct their personal information whenever necessary.

8.2 Users who are registered members can update their Personal Information or change their settings once logged in. If registered members of the Platform wish to cancel their registration, they can do so by contacting the Company at the email address provided below.

8.3 The Users who are not registered members may contact the Company at the email address provided below for a copy of the Personal Information being held about them by the Company. The Company reserves the right to charge a nominal administration fee to cover the data search, preparation and delivery. If a non-registered member of the Platform wishes to access, update, correct inaccuracies or remove any Personal Information held in relation to it, it must contact the Company at the email address provided below. The Company may request certain personal information for the purposes of verifying the identity of the individual seeking access to their Personal Information records.

## **9. AGE RESTRICTIONS**

The Platform and Services are intended solely for persons who are aged 18 years or older. Any access to or use of the Platform or Services by anyone under the age of 18 years is expressly prohibited. By accessing or using the Platform you represent and warrant that you are aged 18 or older. The Company does not knowingly take Personal Information from individuals under the age of 18.

## **10. QUERY/COMPLAINTS PROCEDURE**

If you have any queries, comments or complaints about the Privacy Policy, please contact [info@SureSitter.com](mailto:info@SureSitter.com)

## **11. JURISDICTION**

This privacy policy is governed by the laws of Ireland and Users submit to the exclusive jurisdiction of the Irish Courts in respect of any dispute.