

### **PRIVACY & SECURITY STATEMENT**

### OUR COMMITMENT TO YOUR PRIVACY

**Perfectly Planned LLC is committed to ensuring your privacy.** We respect the relationship we have with our website visitors, and we do not sell any information you provide to us via our website. We also want you to have the opportunity to receive interesting and useful information about Perfectly Planned LLC and about related products and services.

#### 1. INTRODUCTION

This privacy notice provides you with details of how we collect and process your personal data through your use of our site: <u>https://www.perfectlyplanned.com/</u>

Providing us with your information, you warrant to us that you are over 13 years of age. Anna Soares at Perfectly Planned LLC is the data controller and we are responsible for your personal data (referred to as "we", "us" or "our" in this privacy notice).

#### **Contact Details**

Full name of legal entity: Perfectly Planned LLC Email address: info@perfectlyplanned.com Phone: 508.617.8154

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at <u>info@perfectlyplanned.com</u>

# 2. WHAT DATA DO WE COLLECT ABOUT YOU, FOR WHAT PURPOSE AND ON WHAT GROUND WE PROCESS IT

What information do we collect? We may process the following categories of personal data about you:

 Communication Data that includes any communication that you send to us whether that be through the contact form on our website, through email, text, social media messaging, social media posting or any other communication that you send us. We process this data for the purpose of communicating with you, for record keeping and for the establishment, pursuance or defense of legal claims. Our lawful ground for this processing is our legitimate interests which in this case are to reply to communications sent to us, to keep records and to establish, pursue or defend legal claims.

- Customer Data that includes data relating to any purchases of goods and/or services such as your name, title, billing address, delivery address email address, phone number, contact details, purchase details and your card details. We process this data to supply the goods and/or services you have purchased and to keep records of such transactions. Our lawful ground for this processing is the performance of a contract between you and us and/or taking steps at your request to enter into such a contract.
- User Data that includes data about how you use our website and any online services together with any data that you post for publication on our website or through other online services. We process this data to operate our website and ensure relevant content is provided to you, to ensure the security of our website, to maintain back- ups of our website and/or databases and to enable publication and administration of our website, other online services and business. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business.
- Technical Data that includes data about your use of our website and online services such as your IP address, your login data, details about your browser, length of visit to pages on our website, page views and navigation paths, details about the number of times you use our website, time zone settings and other technology on the devices you use to access our website. The source of this data is from our analytics tracking system. We process this data to analyze your use of our website, to deliver relevant website content and advertisements to you and to understand the effectiveness of our advertising. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business and to grow our business and to decide our marketing strategy.
- **Marketing Data** that includes data about your preferences in receiving marketing from us and our third parties and your communication preferences. We process this data to enable you to partake in our promotions such as competitions, prize drawing and free giveaway's, to deliver relevant website content and advertisements to you and measure or understand the effectiveness of this advertising. Our lawful ground for this processing is our legitimate interests which

in this case are to study how customers use our products/services, to develop them, to grow our business and to decide our marketing strategy. We may use Customer Data, User Data, Technical Data and Marketing Data to deliver relevant website content and advertisements to you (including Facebook adverts or other display advertisements) and to measure or understand the effectiveness of the advertising we serve you. Our lawful ground for this processing is legitimate interests which is to grow our business. We may also use such data to send other marketing communications to you. Our lawful ground for this processing is either consent or legitimate interests (namely to grow our business).

What do we use your information for? Any of the information we collect from you may be used in one of the following ways:

- To personalize your experience. (Your information helps us to better respond to your individual needs.)
- To improve our website. (We continually strive to improve our website offerings based on the information and feedback we receive from you.)
- To improve customer service. (Your information helps us to more effectively respond to your customer-service requests and support needs)
- To process transactions: Your information, whether public or private, will not be sold, exchanged, transferred, or given to any other company for any reason whatsoever, without your consent, other than for the express purpose of delivering the purchased product or service requested.
- To administer a contest, promotion, survey or other site feature.
- To send periodic emails: The email address you provide for order processing may be used to send you information and updates pertaining to your order. If at any time you would like to unsubscribe from receiving future emails, we include

detailed unsubscribe instructions at the bottom of each email.

Personal data means any information capable of identifying an individual. It does not include anonymized data.

Where we are required to collect personal data by law, or under the terms of the contract between us and you do not provide us with that data when requested, we may not be able to perform the contract (for example, to deliver goods or services to you). If you don't provide us with the requested data, we may have to cancel a product or service you have ordered but if we do, we will notify you at the time.

We will only use your personal data for a purpose it was collected for or a reasonably compatible purpose if necessary. For more information on this please email us at <u>info@perfectlyplanned.com</u>. In case we need to use your details for an unrelated new purpose we will let you know and explain the legal grounds for processing.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

We do not carry out automated decision making or any type of automated profiling. **Sensitive Data** 

We do not collect any Sensitive Data about you. Sensitive data refers to data that includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. We do not collect any information about criminal convictions and offences.

**California Online Privacy Protection Act Compliance:** Because we value your privacy we have taken the necessary precautions to protect your privacy as outlined in this privacy policy. As part of the California Online Privacy Protection Act, all users of our site may make any changes to their information at any time by emailing us at info@perfectlyplanned.com.

**Children's Online Privacy Protection Act Compliance:** We are in compliance with the requirements of COPPA (Children's Online Privacy Protection Act), we do not collect any information from anyone under 13 years of age. Our website, products and services are all directed to people who are adult business owners.

## 3. HOW WE COLLECT YOUR PERSONAL DATA

We may collect data about you by you providing the data directly to us (for example by filling in forms on our site or by sending us emails). We may automatically collect certain data from you as you use our website by using cookies and similar technologies. Please see our **cookie policy** below for more details about this.

We may receive data from third parties such as analytics providers such as Google, advertising networks such as Facebook based, such as search information providers such as Google, providers of technical, payment and delivery services, such as data brokers or aggregators.

## 4. MARKETING COMMUNICATIONS

Our lawful ground of processing your personal data to send you marketing communications is either your consent or our legitimate interests (namely to grow our business).

Under the Privacy and Electronic Communications Regulations, we may send you marketing communications from us if (i) you made a purchase or asked for information from us about our goods or services or (ii) you agreed to receive marketing communications and in each case you have not opted out of receiving such communications since. Under these regulations, if you are a limited company, we may send you marketing emails without your consent. However, you can still opt out of receiving marketing emails from us at any time.

Before we share your personal data with any third party for their own marketing purposes, we will get your express consent.

You can ask us or third parties to stop sending you marketing messages at any time [by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences] OR [by following the opt-out links on any marketing message sent to you or] OR by emailing us at info@perfectlyplanned.com at any time. If you opt out of receiving marketing communications this opt-out does not apply to personal data provided as a result of other transactions, such as purchases, warranty registrations etc.

# 5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below:

- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers
- Government bodies that require us to report processing activities.
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

## 6. INTERNATIONAL TRANSFERS

We share your personal data within our group of companies which involves transferring your data outside the European Economic Area (**EEA**) (like Dropbox, Paypal, etc., for example which reside in the United States)

Countries outside of the European Economic Area (**EEA**) do not always offer the same levels of protection to your personal data, so European law has prohibited transfers of personal data outside of the EEA unless the transfer meets certain criteria.

Many of our third parties service providers are based outside the European Economic Area (**EEA**) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we do our best to ensure a similar degree of security of data by ensuring at least one of the following safeguards is in place:

• We will only transfer your personal data to countries that the European

Commission have approved as providing an adequate level of protection for

personal data by; or

• Where we use certain service providers, we may use specific contracts or codes

of conduct or certification mechanisms approved by the European Commission

which give personal data the same protection it has in Europe; or

• If we use US-based providers that are part of EU-US Privacy Shield, we may

transfer data to them, as they have equivalent safeguards in place. If none of the above safeguards is available, we may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

## 7. DATA SECURITY

We have put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorization. We also allow access to your personal data only to those employees and partners who have a business need to know such data. They will only process your personal data on our instructions and they must keep it confidential.

We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach if we are legally required to. We implement a variety of security measures to maintain the safety of your personal information when you place an order or enter, submit, or access your personal information. We do not accept or receive personal financial information on our website or through email. All supplied sensitive or credit information is transmitted via WooCommerce order forms which uses Secure Socket Layer (SSL) technology. All of this information is encrypted into Square our payment gateway and is accessible only by authorized personnel with special access rights to such systems who are required to keep such information confidential. After any transaction, your private information (credit cards, social security numbers, financials, etc.) will not be stored on our servers.

## 8. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

When deciding what the correct time is to keep the data for we look at its amount, nature and sensitivity, potential risk of harm from unauthorized use or disclosure, the processing purposes, if these can be achieved by other means and legal requirements. For tax purposes the law in the United States requires us to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for seven years after they stop being customers.

In some circumstances we may anonymize your personal data for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

# 9. YOUR LEGAL RIGHTS

Under data protection laws you have rights in relation to your personal data that include the right to request access, correction, erasure, restriction, transfer, to object to processing, to portability of data and (where the lawful ground of processing is consent) to withdraw consent.

If you are an European Economic Area member you can see more about these rights at: <u>https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/</u>

If you wish to exercise any of the rights set out above, please email us at info@perfectlyplanned.com

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive or refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you.

## 10. THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## 11. COOKIE POLICY

### Do we use cookies? Yes

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

We use Conversion Tracking for our ads and often create Custom Audiences from our website for advertising purposes, and these (a) third parties may use cookies, web beacons, and similar technologies to collect or receive information from our website and elsewhere on the internet and use that information to provide measurement services and target ads, (b) however you can opt-out of the collection and use of information for ad targeting, and (c) this is a website here you can access information on how you can opt out: www.aboutads.info/choices.

### What's a cookie?

- A "cookie" is a piece of information that is stored on your computer's hard drive and which records how you move your way around a website so that, when you revisit that website, it can present tailored options based on the information stored about your last visit. Cookies can also be used to analyze traffic and for advertising and marketing purposes.
- Cookies are used by nearly all websites and do not harm your system.

If you want to check or change what types of cookies you accept, this can usually be altered within your browser settings. You can block cookies at any time by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

### How do we use cookies?

We use cookies to track your use of our website. This enables us to understand how you use the site and track any patterns with regards how you are using our website. This helps us to develop and improve our website as well as products and/or services in response to what you might need or want.

### Cookies are either:

**Session cookies:** these are only stored on your computer during your web session and are automatically deleted when you close your browser – they usually store an anonymous session ID allowing you to browse a website without having to log in to each page but they do not collect any personal data from your computer; or **Persistent cookies:** a persistent cookie is stored as a file on your computer and it remains there when you close your web browser. The cookie can be read by the

website that created it when you visit that website again. We use persistent cookies for Google Analytics.

### Cookies can also be categorized as follows:

**Strictly necessary cookies:** These cookies are essential to enable you to use the website effectively, such as when buying a product and/or service, and therefore cannot be turned off. Without these cookies, the services available to you on our website cannot be provided. These cookies do not gather information about you that could be used for marketing or remembering where you have been on the internet.

**Performance cookies:** These cookies enable us to monitor and improve the performance of our website. For example, they allow us to count visits, identify traffic sources and see which parts of the site are most popular.

**Functionality cookies:** These cookies allow our website to remember choices you make and provide enhanced features. For instance, we may be able to provide you with news or updates relevant to the services you use. They may also be used to provide services you have requested such as viewing a video or commenting on a blog. The information these cookies collect is usually anonymized.

## 12. TERMS AND CONDITIONS

Please also visit our Terms and Conditions section establishing the use, disclaimers, and limitations of liability governing the use of our website at <a href="https://www.perfectlyplanned.com/uploads/1/4/1/1/141192021/terms\_of\_service.pdf">www.perfectlyplanned.com/uploads/1/4/1/1/141192021/terms\_of\_service.pdf</a>

## OTHER

**Your Consent:** By using our site, you consent to our privacy policy. **Changes to our Privacy Policy:** If we decide to change our privacy policy, we will post those changes on this page, and/or update the Privacy Policy modification date stated here: This policy was last modified October 31, 2023