

Phorest Privacy Notice

The following privacy notice outlines how nDevor Systems Ltd T/A Phorest ('we' or 'us' or 'our') gathers, processes, and protects personal data, stored on behalf of Data Controllers. Phorest is a software company that provides services including provision of software to salons and other businesses to manage their business, online booking services and SMS delivery.

The data protection officer for the organisation is Garrett Ahern. You can contact the data protection officer by sending an email to gdprdpo@phorest.com or writing to Data Protection Officer, Phorest, 9 Anglesea Row, Dublin 7, Ireland.

We process your personal information for the purposes laid out in this privacy notice. We act as data processor on behalf of client businesses and have access to personal information of your clients only in cases that customer support or troubleshooting is required.

Personal data collected

We take your privacy seriously and will never sell or rent your personal data to any third-party. We need to obtain and process your personal data to provide you with our software, services and to fulfil our business and legal obligations. We will never collect any personal information from you that we do not need or retain any data that is no longer necessary for the purposes specified in this notice.

Your personal data is collected and processed for the following purposes:

Name & Contact Details

- In the performance of a contract, to manage a software system to sell products or services (name, address, email, contact number)
- Through legitimate interest to engage in communication with you to provide business reports and system-related alerts.
- To contact you with any relevant offers, promotions and services.
- As required by law or to respond to legal process.
- In the performance of contract to process appointments etc, we store consultation forms, appointment data and associated notes.

Tax, banking and payment details

- To receive payments and perform our contract with you.
- As part of our legal obligation for business accounting, tax and insurance purposes.

Rights of the individual

The individual holds a number of rights in relation to the personal information that we hold on them, which includes:

- The right to access what personal data we hold about the individual.
- The right to be informed of how we are using the individual's personal data.
- The right to request the erasure of the personal data we hold on the individual.
- The right to object to us processing the individual's personal data or restrict us from processing some or all of the individual's personal data.
- The right to object to direct marketing from us.
- The right to request the correction of incorrect information we hold on the individual.
- The right to request that we transfer the information we hold on the individual to another service provider.

If we receive a request from the individual to exercise any of the above rights, we may ask to verify your identity before acting on the relevant request; this is to ensure that your data is protected and kept secure.

Process of collection

Personal data is provided to us through Phorest software, our website, over the phone, in Phorest salons, by email, social media, in writing or any other means by which it is provided by salons and/or consumers.

Phorest gives salons access to information about their account and bookings through Phorest software, for the limited purpose of viewing and updating that information.

Data Sharing & Use of Data Processors

We disclose your personal data to third parties for the purposes of providing a service to you, running our business, and when required by law and to enforce our legal rights. Where we use a third-party, we have strict agreements in place

governing the processing of your personal data, on which no action can be taken without instruction from us.

The third-parties with whom we work will never share or disclose your personal information and will hold it securely at all times. Furthermore, they must process the personal information in accordance with this Privacy Notice and as permitted by applicable data protection laws. We share your personal data with the following categories of companies:

- Professional services such as marketing companies to help us run our business and get in contact with you.
- Accountancy and insurance companies to help us run our business and fulfil our legal obligations.
- IT Infrastructure providers are used to store and handle data.

How Long Do We Keep Your Data?

Phorest retains your personal data for as long as necessary to provide you with our services as our client and under the following criteria:

- Where there is a legal basis, obligation or legitimate interest to continuing processing your personal information
- Where processing is necessary for the establishment, exercise or defence of legal claims

Cookies (if applicable)

A 'cookie' is a small piece of data sent from a website and stored on the user's computer by the user's web browser while the user is browsing. When you visit a site that uses cookies for the first time, a cookie is downloaded onto your computer/mobile device so that the next time you visit that site, your device will remember useful information such as items added in the shopping cart, visited pages or login options.

Our website relies on cookies to carry out certain functions and to tailor your user experience. Enabling these cookies is not strictly necessary for the website to work but it will provide you with a better browsing experience. You can delete or block these cookies, but if you do, some features of this site may not work as intended. You can control and/or delete cookies that are already on your computer and you

can set most browsers to prevent them from being placed. If you do this, however, you may have to manually adjust some preferences every time you visit a site and some services and functionalities may not work.

Transfers of personal information

When personal data of persons located in the EU is processed through Phorest software, all of it is held within the EU. Your information is processed by the Phorest software and stored in the Amazon Web Services cloud infrastructure. During this process your data is encrypted in transit and at rest.

Consequences of not providing your personal information to Phorest

In the event that you want to purchase a product or service from Phorest, certain personal information is required to enter into a contract with you. You can always choose not to provide personal information. However, Phorest may not be able to enter into a contract with you to fulfil an attempt to purchase a product or service if you do not provide your personal information.

Safeguarding your Personal Data

Appropriate measures are taken to protect your personal data from access from unauthorized persons or inappropriate access, internal or external. Your connection to the Phorest system uses a HTTP Secure communication protocol and TLS security.

This means all information passed to the Phorest system is encrypted during data input and transfer to the cloud. Any paper files recording your personal data are held in a locked filing cabinet or safe which can only be accessed by authorised personnel.

Your employees should be assigned specific access rights by you (salon management) and through this mechanism, can only access the salon software with the PIN number assigned to them by the management of the salon.

Complaints

In the occurrence that you want to make a complaint about how your personal data was gathered, how it is being processed by Phorest (or third parties used by Phorest) or you are not satisfied about how a complaint has been handled, you retain the right to lodge a complaint directly with the supervisory authority and Phorest and also the Phorest Data Protection Officer. Phorest would appreciate the opportunity to assist you with your query before raising a complaint with Data Protection authorities.

Phorest Data Protection Officer/GDPR Owner

The data protection officer for the organisation is Garrett Ahern. You can contact the data protection officer by sending an email to gdprdpo@phorest.com or by writing to Data Protection Officer, Phorest, 9 Anglesea Row, Dublin 7, Ireland.

Changes to our privacy notice

We may change this notice from time to time. All changes will be posted and updated here. We will notify you directly by email (if we hold one for you) if any significant changes occur. We advise you to check back here frequently to review the most current version of this notice.