

Privacy Policy

1. Privacy policy introduction
2. What information do we collect?
3. How do we collect information from you?
4. Meeting our legal and regulatory obligations
5. How do we use the information we collect?
6. How you can manage your personal data
7. Security - how we protect your personal information
8. How long do we keep your data for?
9. What rights do you have?
10. Updates to this privacy policy
11. How to contact us

1. Privacy policy introduction

This privacy policy (the "policy") was last updated on 03 June 2020.

Psychologic Edge International Ltd. ("us", "we", or "our") operates the Well Planned Scheduler mobile application (the "Service").

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us, and applies to all of your personal data irrespective of the medium or method by which we obtained/received your personal data.

In this policy, the term "personal" data means data relating to a living individual who is or can be identified either from the data, or from the data in conjunction with other information, that is in, or is likely to come into, our possession, and includes personal data as described in data protection legislation (as defined below).

2. What information do we collect?

We fully respect your right to privacy in relation to your interactions with the Service, and we endeavour to guarantee to be transparent in our dealings with you as to what information we will collect and how we will use your information. Also, we only collect and use individual user details where we are legally entitled to do so. Information in relation to personal data collected by Irish entities is available on www.dataprotection.ie, the Service of the Irish Data Protection Commissioner ("DPC").

We will handle your personal data in accordance with data protection legislation. 'Data protection legislation' means the Data Protection Acts 1988 and 2003 and Directive 95/46/EC, and any other applicable law or regulation relating to the

processing of personal data and to privacy (including the E-Privacy Directive), as such legislation shall be amended, revised or replaced from time to time, including by operation of the General Data Protection Regulation (EU) 2016/679 ('GDPR') (and laws implementing or supplementing the GDPR).

We only collect and use individual user details where we are legally entitled and/or required to do so. Where you have provided your consent to our collection and use of your personal data, you are entitled to withdraw such consent by notice to us.

Psychologic Edge International Ltd. may collect various types of personal information, including:

- For business purposes, we will collect personal and business contact information (such as Full Name, Age, Gender, Job Title, Email, Mobile, Sleep related preferences and behaviour).
- **Cookies and Usage Data**
We use cookies and similar tracking technologies to track the activity on our Service and hold certain information. Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyse our Service. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.
Examples of Cookies we use:
 - **Session Cookies.** We use Session Cookies to operate our Service.
 - **Preference Cookies.** We use Preference Cookies to remember your preferences and various settings.
 - **Security Cookies.** We use Security Cookies for security purposes.

If you submit any personal information about other people to us or to our service providers (e.g. business colleagues), you represent that you have the authority to do so and to permit us to use their personal information in accordance with this privacy policy.

Images and visual content

If you submit such content, you are doing so in the full acknowledgement that you have and can provide Psychologic Edge International Ltd. with evidence of the required copyright allowing Psychologic Edge International Ltd. and its partners to use the content. You also acknowledge that you can provide Psychologic Edge International Ltd. with evidence of the necessary waivers and permissions from

persons in the images/footage for you to share such content with Psychologic Edge International Ltd. and its partners.

Psychologic Edge International Ltd., on occasion, takes photographs of participants at its events (such as sales and promotions events, or training and networking events). We will endeavour to check you are happy to feature in a photo wherever possible, however often photos are of large groups and it is not possible to check with you in advance. Part of the terms of conditions of your acceptance to attend these events is your acceptance to be included in photographs, and in doing so you give Psychologic Edge International Ltd. permission to use these photos for legitimate business purposes such as evidencing that the event took place, local or internal publicity or promoting similar events.

How we collect personal data

We and our service providers may collect personal information from a variety of sources, including:

***Through the Service:** We may collect personal information about you when you use our service. e.g. When you access the Service by or through a mobile device, we may collect certain information automatically, including, but not limited to, the type of mobile device you use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use, unique device identifiers and other diagnostic data ("Usage Data")*

3. How do we collect information from you?

We and our third-party service providers may collect and automatically process this information in a variety of ways, including:

- **To register as a user of our service** we need to collect information such as your name and email address, the name and address of your company, your job title and the services you have an interest in. We may ask different questions for different services, including competitions. We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
- **Through your browser or device:** most browsers and landing pages collect certain information automatically, for example, type and version of operating system, screen resolution, device manufacturer and model, language, internet browser type and version, and the name. We use this information, for example, to make sure that the service function properly, analyse the performance of the applications, and to improve and maintain the services.

- **IP address:** IP addresses are automatically transmitted as part of any internet communication, and collecting IP addresses is a common practice; many Services, applications and other Psychologic Edge International Ltd. services collect IP addresses automatically. We use IP addresses for purposes such as communicating with your device, calculating usage levels of the Psychologic Edge International Ltd. services, helping diagnose server problems, security, and administering the Psychologic Edge International Ltd. services.
- **Location data:** We may collect the physical location of a connected device, for example, using satellite, cell phone tower, and WiFi signals. We may use your device's physical location to provide you with location-based Psychologic Edge International Ltd. services and content. You can choose whether to allow or deny uses and/or sharing of your device's location by changing your device settings, but if you choose to deny such uses and/or sharing, we and/or our marketing partners may not be able to provide you with the applicable Psychologic Edge International Ltd. services and content.
- **Applications:** developed in connection with the Service for mobile devices will operate and capture information as set out above and are also subject to this policy. Applications developed by us but deployed on other platforms such as social media channels may provide feedback to us on activity and usage specific to a user.

4. How we use your data and our legal and regulatory obligations

Psychologic Edge International Ltd. provide a range of practical business supports (services) to improve operations, product and service development and sales and marketing in Ireland and overseas.

Psychologic Edge International Ltd. reserve the right to use your information lawfully where;

- It is necessary for the performance of a contract
- It is necessary to protect the vital interest of the data subject or other natural person.
- You have provided us with your consent.
- It is necessary for the purposes of the legitimate interest pursued by us except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.

To meet our regulatory and legal obligations, we collect some of your personal information, verify it, keep it up to date through regular checks, and delete it once we no longer have to keep it. We may also gather information about you from third parties to help us meet our obligations. If you do not provide the information we need, or help us keep it up to date, we may not be able to provide you with our products and services.

5. How do we use the information we collect?

We may use personal information:

- To Provide and Maintain the Service
- To Notify you of changes to the Service
- To allow you to participate in interactive features of our Service when you choose to do so
- To provide customer care and support
- To provide analysis or valuable information so that we can improve the Service
- To detect, prevent and address technical issues
- To provide you with information about our Service. You should only receive correspondence and updates from us if you have agreed to in response to any contact you have made with us, e.g. on our Service, by email or via the 'How to contact us' facility. It will be made clear to you where you have these choices, for example, by providing tick boxes for you to decide whether you wish to receive e-newsletters.
- For administration reasons related to the service to which you have signed up (e.g. to provide you with password reminders or to notify you that the service, activity or online content has been suspended for maintenance, or in response to a question that you ask us).
- To carry out any legal obligations arising from your interaction with the Service, and to allow you to participate in interactive features of our service, when you choose to do so.
- We may ask you for personal information such as clothing sizes, next of kin to facilitate familiarisation trips and mechanise for operators, media, buyers, etc.
- For our business purposes, such as data analysis, economic and business performance tracking, audits, security, developing new products, testing, enhancing, improving or modifying our Psychologic Edge services, identifying usage trends, determining the effectiveness of our promotional campaigns, and operating and expanding our business activities.
- Perform accounting, auditing, billing, reconciliation, and collection activities. To send administrative information and service notifications to you, for example, information regarding the Services and changes to our terms, conditions, and policies.
- Perform other activities consistent with this policy. Where we wish to use your personal information in any other way, we will ensure that we notify you and get your consent first. You will be given the opportunity to withhold or withdraw your consent for the use of your personal information for purposes other than those listed in this policy.

Personal information may be shared or disclosed:

- To our authorized service providers and suppliers who provide services to us such as Service hosting, data analysis, order fulfilment, information technology and related infrastructure provision, customer service, email delivery, auditing and other similar services.
- When we share personal information with a Psychologic Edge International Ltd. service provider, we require that they first contractually agree to comply with reasonable and appropriate privacy and security standards.
- Psychologic Edge International Ltd. does not share or sell your personal information with non-affiliated third parties for their own marketing or commercial use.

International transfer of personal information;

The personal data that we collect from you may be transferred to and stored by the Authority. It may also be processed by staff of the Authority. By submitting your personal data, you agree to this transfer, storing or processing of your personal data by the Authority for the purposes set out in this policy.

Psychologic Edge International Ltd. is an IRL/EU based organisation. Your information, including Personal Data, may be transferred to and maintained on computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction. If you are located outside Ireland and choose to provide information to us, please note that we transfer the data, including Personal Data, to Ireland and process it there. Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer. Psychologic Edge International Ltd. will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and GDPR and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

- Whenever Psychologic Edge International Edge Ltd. shares personal information originating in the European Economic Area (EEA) with a Psychologic Edge International Ltd. entity or office outside the EEA, it will do so on the basis of its approved binding corporate data processing agreement (DPA) which establishes adequate protection of such personal information and are legally binding on Psychologic Edge International Ltd 's subsidiaries.

- Where Psychologic Edge International Ltd's DPA does not apply, Psychologic Edge International Ltd. will instead rely on other lawful measures to transfer your personal information outside the EEA and Switzerland, such as the EU standard contractual clauses.
- In agreeing to Psychologic Edge International Ltd's privacy policy the data subject gives his/her explicit consent in respect of potential data transfers outside the EEA for the purposes mentioned.

Third parties;

- We wish to remind you that this policy applies to personal data that we collect/process through your use of the Service. It does not apply to any links to third-party Services and/or services, such as third-party applications, that you may encounter when you use the Service. You acknowledge that the service that we provide may enable or assist you to access the Service content of, correspond with, and purchase products and services from, third parties via third-party Services and that you do so solely at your own risk. We make no representation or commitment and shall have no liability or obligation whatsoever in relation to the content or use of, or correspondence with, any such third-party Service, or any transactions completed, and any contract entered into by you, with any such third party and the use by any such third-party of your personal data.

We do not endorse or approve any third-party Service nor the content of any of the third-party Service made available via the Service. We encourage you to carefully familiarize yourself with terms of use and privacy policies applicable to any Services and/or services operated by third parties. Please be aware that we are not responsible for the privacy practices of any third parties.

6. How you can manage your personal data

We endeavour to keep all personal data that you provide to us accurate and up to date. As such, you must tell us about any changes to such information as soon as possible. If you are a registered user of the service you can update your personal information at any time.

7. Security - How we protect your personal information

The Service is designed to provide reasonable and appropriate organizational, technical, and administrative measures to protect personal information within our organization against unauthorized or unlawful access, alteration, disclosure, or destruction. Users of Psychologic Edge International Ltd's services must also do their part in protecting the data, systems, networks, and service they are utilizing.

Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that your password to any Psychologic Edge International Ltd's account has been compromised), please immediately notify us by contacting us in accordance with the 'Contact Us' section below.

For your protection, we will only implement requests with respect to personal information about you (not anyone else), and we may need to verify your identity before implementing your request. We will comply with your request as soon as reasonably practicable and in accordance with applicable law. We may need to retain certain information for recordkeeping purposes, as required under applicable legal obligations, and/or to complete any transactions that you began prior to requesting such change or deletion (e.g. when you make a purchase or enter a promotion, you may not be able to change or delete the personal information provided until after the completion of such purchase or promotion). Some of your information may remain within our systems and other records, in compliance with applicable law.

8. How long do we keep your data for?

To meet our legal and regulatory obligations, any information that you provide to us will be kept and stored for such period of time as we deem necessary taking into account the purpose for which it was collected in the first instance, and our obligations under data protection legislation.

In general, your personal data will be retained by us for two years and six months from the last date of contact or transaction.

9. What rights do you have?

As a data subject, you have the following rights under data protection legislation:

- the right of access to personal data relating to you.
- the right to correct any mistakes in your personal data.
- the right to ask us to stop contacting you with direct marketing.
- rights in relation to automated decision taking.
- the right to restrict or prevent your personal data being processed.
- the right to have your personal data ported to another data controller.
- the right to erasure.
- the right to complain to the Data Protection Commissioner if you believe we have not handled your personal data in accordance with the data protection legislation.

These rights are explained in more detail below, but if you have any comments, concerns or complaints about our use of your personal data, please contact us (see 'How to contact us' below).

We will respond to any rights that you exercise within a month of receiving your request, unless the request is particularly complex or cumbersome, in which case we will respond within three months (we will inform you within the first month if it will take longer than one month for us to respond).

Where a response is required from us within a particular time period pursuant to data protection legislation, we will respond within that time period.

Right to access to personal data relating to you

You may ask to see what personal data we hold about you and be provided with:

- a summary of such personal data and the categories of personal data held.
- details of the purpose for which it is being or is to be processed.
- details of the recipients or classes of recipients to whom it is or may be disclosed, including if they are overseas and what protections are used for those overseas transfers.
- details of the period for which it is held (or the criteria we use to determine how long it is held).
- details of your rights, including the rights to rectification, erasure, restriction or objection to the processing.
- any information available about the source of that data.
- whether we carry out automated decision-making, or profiling, and where we do, information about the logic involved and the envisaged outcome or consequences of that decision making or profiling.
- where your personal data are transferred out of the EEA, what safeguards are in place.

Requests for your personal data must be made to us (see 'How to contact us' below) specifying what personal data you need access to, and a copy will be retained on your personal file. To help us find the information easily, please give us as much information as possible about the type of information you would like to see.

If, to comply with your request, we would have to disclose information relating to or identifying another person, we may need to obtain the consent of that person, if possible. If we cannot obtain consent, we may need to withhold that information or edit the data to remove the identity of that person, if possible.

There are certain types of data which we are not obliged to disclose to you, which include personal data which records our intentions in relation to any negotiations with you where disclosure would be likely to prejudice those negotiations.

We are entitled to refuse a data access request from you where (i) such request is manifestly unfounded or excessive, in particular because of its repetitive character (in this case, if we decide to provide you with the personal data requested, we may charge you a reasonable fee to account for administrative costs of doing so), or (ii) we are entitled to do so pursuant to data protection legislation.

Right to update your personal data or correct any mistakes in your personal data

You can require us to correct any mistakes in your personal data, which we hold free of charge. If you would like to do this, please:

- email, call or write to us (see 'How can you contact us' below).
- let us have enough information to identify you (e.g. name, registration details).
- let us know the information that is incorrect and what it should be replaced with.

If we are required to update your personal data, we will inform recipients to whom that personal data have been disclosed (if any), unless this proves impossible or has a disproportionate effort.

It is your responsibility that all of the personal data provided to us is accurate and complete. If any information you have given us changes, please let us know as soon as possible (see 'How to contact us' below).

Right to ask us to stop contacting you with direct marketing

You can ask us to stop contacting you for direct marketing purposes. If you would like to do this, please:

- email, call or write to us (see 'How can you contact us' below). You can also click on the 'unsubscribe' button at the bottom of the email newsletter. It may take up to five days for this to take place.
- let us know what method of contact you are not happy with if you are unhappy with certain ways of contacting you only (for example, you may be happy for us to contact you by email but not by telephone).

We will provide you with information on action taken on a request to stop direct marketing - this may be in the form of a response email confirming that you have 'unsubscribed'.

Rights in relation to automated decision taking (if applicable)

You may ask us to ensure that, if we are evaluating you, we don't base any decisions solely on an automated process and have any decision reviewed by a member of staff.

These rights will not apply in all circumstances, for example, where the decision is (i) authorised or required by law, (ii) necessary for the performance of a contract between you and us, or (iii) is based on your explicit consent. In all cases, we will endeavour that steps have been taken to safeguard your interests.

Right to restrict or prevent processing of personal data

In accordance with data processing legislation, you may request that we stop processing your personal data temporarily if:

- you do not think that your data is accurate (but we will start processing again once we have checked and confirmed that it is accurate).
- the processing is unlawful but you do not want us to erase your data.
- we no longer need the personal data for our processing, but you need the data to establish, exercise or defend legal claims.
- you have objected to processing because you believe that your interests should override the basis upon which we process your personal data.

If you exercise your right to restrict us from processing your personal data, we will continue to process the data if:

- you consent to such processing.
- the processing is necessary for the exercise or defence of legal claims.
- the processing is necessary for the protection of the rights of other individuals or legal persons.
- the processing is necessary for public interest reasons.

Right to data portability

In accordance with data protection legislation, you may ask for an electronic copy of your personal data that you have provided to us and which we hold electronically, or

for us to provide this directly to another party. This right only applies to personal data that you have provided to us it does not extend to data generated by us.

The right to data portability also only applies where:

- the processing is based on your consent or for the performance of a contract
- the processing is carried out by automated means

Right to erasure

In accordance with data protection legislation, you can ask us to erase your personal data where:

- you do not believe that we need your personal data in order to process it for the purposes set out in this policy.
- if you had given us consent to process your personal data, you withdraw that consent and we cannot otherwise legally process your personal data.
- you object to our processing and we do not have any legal basis for continuing to process your personal data.
- your data has been processed unlawfully or have not been erased when it should have been.
- the personal data have to be erased to comply with law.

We may continue to process your personal data in certain circumstances in accordance with data protection legislation.

Where you have requested the erasure of your personal data, we will inform recipients to whom that personal data have been disclosed, unless this proves impossible or involves disproportionate effort. We will also inform you about those recipients if you request it.

Right to complain to the Data Protection Commissioner (DPC)

If you do not think that we have processed your personal data in accordance with this policy, please contact us in the first instance. If you are not satisfied, you can complain to the DPC or exercise any of your other rights pursuant to data protection legislation. Information about how to do this is available on the DPC Service at www.dataprotection.ie.

Offensive content

If you post or send content which may reasonably be deemed to be offensive, inappropriate or objectionable anywhere on the Service or otherwise engage in any disruptive behaviour on the Service, we may remove such content.

Where we reasonably believe that you are or may be in breach of any applicable laws, for example on hate speech, we may disclose your personal information to relevant third parties, including to law enforcement agencies or your internet provider. We would only do so in circumstances where such disclosure is permitted under applicable laws, including data protection legislation.

10. Updates to this privacy policy

We may change this privacy policy. The 'Last Updated' section at the top of this page states when this privacy policy was last revised. Any changes to this privacy policy will become effective when we post the revised privacy policy on the Psychologic Edge International Ltd. corporate Service & Trade Portal. Your use of the Service following these changes means that you accept the revised privacy policy.

If any change may materially and negatively affect the privacy of your personal information, we will use reasonable efforts to notify you in advance and give you a reasonable period of time to object to any changes.

We encourage you to periodically review this privacy policy to stay informed about how we collect, use, and share personal information.

11. How to contact us

We have appointed a data protection officer in accordance with data protection legislation.

However, if you need to contact us with regard to any of your rights as set out in this policy, all such requests should be made in writing by:

Emailing: info@psychologic.ie

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