



PRIVACY POLICY

1. Introduction

This Privacy Policy describes how Busy Bees FZCO and its affiliates will gather, use, and maintain your Personal Information on the Busy Bees Platform. It will also explain your legal rights with respect to that information.

By using the Busy Bees Platform, you confirm that you have read and understand this Privacy Policy, and our Terms of Service (together referred to herein as the "Agreement"). The Agreement governs the use of the Busy Bees Platform. Busy Bees will collect, use, and maintain information consistent with the Agreement.

If you are a data subject in Europe, please see the "Additional Disclosures for Data Subjects in the European Economic Area (EEA), Switzerland, and the UK" sections, respectively. If you have any questions or wish to exercise your rights and choices, please contact us as set out in the "Contact Us" section below.

2. General Terms

In this Privacy Policy:

- Busy Bees FZCO. may be referred to as "**Busy Bees,**" "**we,**" "**our,**" or "**us.**"
- We call a user of the Busy Bees Platform "**User,**" "**Users,**" "**you,**" "**your,**" or "**Client**" and "**Bee,**" as appropriate.
- The community platform that we offer at our website www.Busy-Bees.eu and is referred to as the "**Site(s).**"
- The mobile applications (whether on iOS or Android) are referred to as the "**Apps.**"
- Busy Bees's Sites, Apps and related services, information and communications are collectively referred to as the "**Busy Bees Platform.**"
- "**Terms of Service**" refers to our Global Terms of Service, which can be found here. This Privacy Policy is incorporated into, and considered a part of, the Terms of Service.

3. Information Collection

Information you provide to Busy Bees

Busy Bees collects certain personally identifiable information about you, including information that can identify, relate to, describe, be associated with you, or is reasonably capable of being associated with you (“**Personal Information**”).

Examples of Personal Information that Busy Bees collects include but are not limited to:

Contact Information. This may include your first and last name, postal address, telephone number, and email address.

Billing Data. including your payment instrument number (such as a credit or debit card number), expiration date, and security code as necessary to process your payments.

Identity Information. If you are a Bee, we may collect Personal Information, such as your date of birth and address, national identification number if applicable, together with the result of basic criminal record checks as provided by you, or by our Third-Party Agents (as defined below), as applicable and to the extent permitted by law in your jurisdiction, as well as such information as may be needed to validate your identity.

Financial Information. To enable Bees and Clients to use the Busy Bees Platform, we may collect financial information, including credit card number, bank routing numbers, and other payment information, as applicable. We use Financial Information ONLY to operate the Busy Bees Platform by collecting the monthly abo fee as signed up by you. We do this as necessary for our legitimate interests in providing our platform and services. To keep your financial data secure, we have contracted with a third party payment processor to maintain and process your payment information.

Promotional Information. Certain offerings of the Busy Bees Platform, such as newsletters, surveys, contests, and the like are optional and so you are not required to enter them or to give us your data in connection with them. Where you do consent to take advantage of Busy Bees Platform offerings, we will use your data to (as applicable) send you newsletters and other communications that are tailored based on information we have about you, or to operate and manage the survey, contest or similar offering in connection with our legitimate interest in promoting our business and the Busy Bees Platform. To opt-out of receiving marketing communications from us, please see Section 7, Your Rights and Choices.

Employment Information. You can provide and we will collect and present for you employment and education history, transcripts, writing samples, and references as necessary to consider your application for open jobs from Clients.

Content Information. You also may choose to send Busy Bees Personal Information in an email or chat message containing inquiries about the Busy Bees Platform and we use this Information in order to help us respond to your inquiry. We also collect content within any messages you exchange with other Users through the Busy Bees Platform (such as through our chat functionality).

We require that you furnish certain information when you register an account with us in order to provide services through the Busy Bees Platform. For example, if you are a Client, we collect your first and last name, email address, and your zip or postal code in order to create and administer your Busy Bees account. We also collect additional information in order to facilitate your job request, such as information about the task you are seeking, the time, date and location of the task. If you are a Bee, we collect your first and last name, email address, mobile phone number and zip or postal code and further data in order to create and administer your Busy Bees account and facilitate communications between you and your Clients through the Busy Bees Platform. We also collect information about your tasks, rates, and skills, as well as Identity Information and your voluntarily provided data.

Third Party Information. If you registered through a co-branded version of our Busy Bees Platform through one of our Partners (as defined below), they may provide us with basic information such as your name, address, email, and purchase history related to your Task needs. We may receive additional information about you, such as demographic data, Financial Information, or fraud detection information, from Third-Party Agents (as defined below) and combine it with other information that we have about you, to the extent permitted by law, in order to comply with our legal obligations and for the legitimate interest in improving the Busy Bees Platform. Busy Bees may work with Third-Party Agents to perform identity checks and criminal background checks on Bees, if applicable and permitted by local law, in order to advance our legitimate interests in ensuring the safety of our Users and maintaining the integrity of the Busy Bees Platform.

4. Information Busy Bees Collects Automatically

We automatically collect certain information when you use the Busy Bees Platform. The categories of information we automatically collect and have collected, including in the last 12 months, are as follows:

Service Use Data, including data about features you use, pages you visit, emails and advertisements you view, portions of the Busy Bees Platform that you view and interact with, the time of day you browse, and your referring and exiting pages.

Device Data, including data about the type of device or browser you use, your device's operating system, your internet service provider, your device's regional and language settings, and device identifiers such as IP address and Ad Id. When you visit

and interact with the Busy Bees Platform, Busy Bees may collect certain information automatically through cookies or other technologies, including, but not limited to, the type of computer or mobile device you use, your mobile device's unique device ID, the IP address of your computer or mobile device, your operating system, the type(s) of internet browser(s) you use, and information about the way you use the Busy Bees Platform ("**Device Information**"). We may use Device Information to monitor the geographic regions from which Users navigate the Busy Bees Platform, and for security and fraud prevention purposes. Use of any IP-masking technologies or similar technologies (like the TOR network) may render portions of the Busy Bees Platform unavailable and are forbidden on the Busy Bees Platform.

Location Data, including imprecise location data (such as location derived from an IP address or data that indicates a city or postal code level), and, with your consent, precise location data (such as latitude/longitude data). When you visit the Busy Bees Platform via a native mobile application, we use, with your consent when required under applicable law, GPS technology (or other similar technology) to determine your current location in order to determine the city you are located in and display a relevant location map. We will not share your current location obtained in this manner with other Users.

Cookies and similar technologies are described in our [Cookie Policy](#), which sets out the different categories of cookies and similar technologies that the Busy Bees Platform uses and why we use them.

5. Busy Bees's Use of Information

We collect and use information for business and commercial purposes in accordance with the practices described in this Privacy Policy. Our business purposes for collecting and using information include:

- To operate and make available the Busy Bees Platform. We use your data to connect you with other Users to enable the posting of, selection for, completion of Tasks, in order to fulfil our contracts with Users;
- For fraud prevention, on the basis of our legitimate interests in ensuring a safe and secure environment in which Clients and Bees can meet and conduct business, and in order to comply with our legal obligations;
- To conduct identification and criminal background checks, if applicable and to the extent permitted by local law, on Users, in order to advance our legitimate interests as well as for the substantial public interest of ensuring the safety of our Users both online and offline, preventing or detecting unlawful acts, protecting the public against dishonesty, and maintaining the integrity of the Busy Bees Platform given that Bees often interact directly with Clients and may enter their homes;

- To analyse Busy Bees Platform usage as necessary for our legitimate interest in improving the Busy Bees Platform to grow our business;
- To contact you and deliver (via email, SMS, push notifications, or otherwise) transactional information, administrative notices, marketing notifications, offers and communications relevant to your use of the Busy Bees Platform, with your consent when required under applicable law, as necessary for our legitimate interests in proper communication and engagement with our Users, and in promoting our business;
- To provide you with customer support in order to fulfill our contracts with Users;
- For internal market research for our legitimate interest in improving the Busy Bees Platform to grow our business;
- For troubleshooting problems for our legitimate interests in ensuring a safe and secure environment in which Users can meet;
- To assist Users in the resolution of complaints and disputes between them, as necessary for our legitimate interests in facilitating good relations among Users;
- To enforce our Terms of Service and our legitimate interests in ensuring our Agreement is complied with; and
- As otherwise set forth in the Agreement.

Interest-Based Advertising. Ads are a standard part of user experience on the Internet, and Busy Bees believes that targeted advertising enhances this experience. Busy Bees and affiliate third parties may use cookies and other technologies to place ads where they believe interested Users will see them. In addition to banner ads, Busy Bees may advertise products, companies and events that we think might interest you through the email address and/or phone number you provide. We may incorporate Tracking Technologies on the Busy Bees Platform (including our website and emails) as well as into our ads displayed on other websites and services. Some of these Tracking Technologies may track your activities across time and services for purposes of associating the different devices you use, and delivering relevant ads and/or other content to you (“**Interest-Based Advertising**”).

For more information and to understand your choices regarding third-party ads, please see our Cookie Policy. Advertising and marketing is carried out as necessary for our legitimate interests in providing an engaging and relevant experience, promoting our services, and growing our business.

Analytics and Market Analysis. Busy Bees may analyse information (“**Market Analysis**”) as necessary for our legitimate interests in providing an engaging and relevant experience, and promoting and growing the Busy Bees Platform.

Busy Bees uses information to offer services to Users who express an interest in these services, through a poll for example, or to Users who can be presumed to have an interest based on results from our Market Analysis. We do this as necessary for our

legitimate interests in providing an engaging and relevant experience, promoting our services, and growing our business.

Cell Phone Numbers. Busy Bees may use your cell phone number to call or send recurring text messages to you, using an autodialer or prerecorded voice, in order to provide you notifications about Tasks, for marketing purposes (with your consent where required by law), and to administer the Busy Bees Platform. If you would like more information about our policy, or how to opt out, please review the “Your Rights and Choices” section below or Section 9 of our [Terms of Service](#). You may be liable for standard SMS and per-minute charges by your mobile carrier. Busy Bees may also message you via push notifications (with your consent when required under applicable law), which you can opt-out of on your mobile device. Data rates may apply.

Call recordings. Calls to or from Busy Bees or its Third Party Agents may be monitored and recorded for the purposes of quality control and training. Such calls may contain Personal Information.

6. Information Sharing

We only share the Information we collect about you as described in this Privacy Policy or as described at the time of collection or sharing, including as follows:

Third Party Agents. We share information, including Identity Information, with entities that process information on our behalf for our business purposes. We contractually prohibit our Third-Party Agents from retaining, using, or disclosing information about you for any purposes other than performing the services for us, although we may permit them to use information that does not identify you (including information that has been aggregated or de-identified) for any purpose except as prohibited by applicable law.

To operate the Busy Bees Platform, including processing your transactions, we may share your Personal Information with our agents, representatives, vendors and service providers (“**Third Party Agents**”) so they can provide us with support services as follows:

- Email origination;
- Identity checks, and criminal background checks, to the extent permitted by applicable law;
- Fraud prevention and detection. We further use information relating to you and your use of and activity on the Busy Bees Platform to provide fraud detection services to their other Clients;
- Support services;
- Customer relationship management services;
- Data analytics;

- Marketing and advertising;
- Website hosting;
- Communications services;
- Technical support;
- Financial transaction fulfillment (in which we are currently supported by Stripe, who processes your Personal Information in accordance with its own [privacy policy](#)) and related chargeback and collection services; and
- To otherwise help us provide the Busy Bees Platform.

Partners. Some Busy Bees content is "sponsored by" or "presented by" other companies. If you connect to the Busy Bees Platform through a co-branded version of our Busy Bees Platform or otherwise participate in one of our partner programs, we may share information about your use of the Busy Bees Platform with that Partner in order to offer the integrated platform and to evaluate the partner program. We may also share your Personal Information with our Partners in order to receive additional information about you, or in order to create offers that may be of interest to you. Please check such Partner's privacy policy before revealing information about yourself. If you don't want these Partners to have your Personal Information, you can choose to not participate.

Promotions. When you voluntarily enter a sweepstakes, contest, or other promotion, we share information as set out in the official rules that govern the promotion as well as for administrative purposes and as required by law (e.g., on a winners' list). By entering a promotion, you agree to the official rules that govern that promotion, and may, except where prohibited by applicable law, allow the sponsor and/or other entities to use your name, voice, and/or likeness in advertising or marketing materials. We may occasionally contact you, if you want us to, with information about special events, activities, promotions, contacts, submission opportunities, and programs. You always have the ability, in your Account, to ask Busy Bees not to contact you with this type of information. Please see Section 7, Your Rights and Choices, for more information.

Matched Ads. We use Matched Ads by sharing personal information with another party or incorporating a pixel from another party into our own Sites, and the other party matching common factors between our data and their data or other datasets for advertising purposes.

Other Users. Busy Bees facilitates contact between Clients and Bees and reserves the right to share one User's contact information (e.g., name, phone number, email, or postal address) with other Users, or with the recipient User's legal or other authorized representative, in order to: (1) facilitate or communicate the resolution of an investigation or dispute related to or arising from an interaction between two or more Users of the Busy Bees Platform; or (2) facilitate the performance of a Task. This exchange of information is essential to the operation of the Busy Bees Platform and we do this only as permitted by law.

Legal Obligations. Busy Bees and our Third Party Agents may disclose your Personal Information or User Generated Content to courts, law enforcement, governmental or public authorities, tax authorities or authorised third parties, if and to the extent required or permitted to do so by law or where disclosure is reasonably necessary to: (i) comply with Busy Bees’s legal or regulatory obligations; (ii) respond to a court order, warrant or subpoena; (iii) respond to a valid legal request relating to an investigation into alleged criminal or illegal activity; or (iv) respond to or address any other activity that may expose us to legal or regulatory liability.

Busy Bees reserves the right to disclose Personal Information from both private and public areas of the Busy Bees Platform in the absence of a court order, warrant, or subpoena, to the extent permitted by applicable law, if we are given reason to believe, in our sole discretion, that someone is causing injury to or interfering with the rights of Users, the general public, or Busy Bees or its partners, parents or affiliates.

It is our policy to provide notice to Users before producing their information in response to law enforcement requests unless (i) we are prohibited or otherwise constrained by law or court order from doing so, (ii) we have reason to believe the User’s account has been compromised such that the notice would go to the wrong person, or notice would otherwise be counterproductive or would create a risk to safety, or (iii) it is an emergency request and prior notice would be impractical (in which case we may provide notice after the fact).

Merger or Acquisition. Busy Bees reserves the right to share information in connection with, or during negotiations of, any proposed or actual merger, purchase, sale, or any other type of acquisition or business combination of all or any portion of our assets, or transfer of all or a portion of our business to another business.

Public Areas. Your profile on the Busy Bees Platform consists of information about you and your business, and may include information such as photographs, your years in business, skills and expertise, hourly pay rates, feedback/rating information, and other information, including your username (“**Profile**”). The information in your User Profile may be visible to all Users and the general public. If you choose to post a Task via the Busy Bees Platform, the contents of such listing will be viewable to Bees you select on the Busy Bees Platform.

7. Your Rights and Choices

You may opt-out of receiving promotional communications from us, including promotional communications related to the Busy Bees Platform, and request the removal of your Personal Information from our databases, or deactivate your account, by logging on to the Site or App and clicking on the “Account” tab, or by contacting us.

Account Settings. During registration you choose whether to receive marketing correspondence from Busy Bees. This information remains on your Profile where you can, at any point, easily edit it. After logging on, click on the "Account" tab, then select "Notifications" to make your preferred selections.

Push Notifications. You have the option to receive updates and relevant offers via push notifications in your app. These notifications can be configured in the settings of your mobile device at any time.

Corrections to Profile. You have the right to access, update, and correct inaccuracies in your Busy Bees Profile at any time by logging in and clicking on the "Account" tab. There, you can view, update, and correct your Account information.

So that we may protect the integrity of the Busy Bees Platform, there are certain pieces of information, such as your age, that you cannot alter yourself. For example, since children under the age of majority in their jurisdiction of residence are not allowed to register as Users, we need to take reasonable measures to preserve the accuracy of our Users' ages. You may contact us at office@Busy-Bees.eu if there is a need to make a correction to such data. Please see Section 11, Children's Privacy, for more details.

Promotional Communications. You can opt out of receiving promotional communications from Busy Bees via the Account tab in your Profile. In addition, you can opt out of email marketing by clicking on the unsubscribe link in any message. You can opt out of promotional communications from Busy Bees sent via text message at any time by following the instructions provided in those messages to text the word "STOP". Please note that your opt-out is limited to the phone number used and will not affect subsequent subscriptions. If you opt-out of only certain communications, other subscription communications may continue. Even if you opt-out of receiving promotional communications, Busy Bees will continue to send you non-promotional communications, such as those about your account, Tasks, transactions, servicing, or Busy Bees's ongoing business relationship with you. If you receive unsolicited promotional communications from a Busy Bees domain, please get in contact with us.

8. Busy Bees's Information Retention Policy

We retain personal data for as long as you are a User in order to meet our contractual obligations to you, and for such longer period as may be in our legitimate interests and to comply with our legal obligations (see Exhibit A for exemplar document retention periods). We may also retain data from which you cannot directly be identified, for example where stored against a randomly-generated identifier so we know the data relates to a single User, but we cannot tell who that User is. We use this kind of data for research purposes and to help us develop and improve our

services, and we take appropriate measures to ensure you cannot be re-identified from this data.

9. Busy Bees's Security of Collected Information

Your Busy Bees account is password-protected so that only you and authorized Busy Bees staff have access to your account information. In order to maintain this protection, do not give your password to anyone. Also, if you share a computer, you should sign out of your Busy Bees account and close the browser window before someone else logs on. This will help protect your information entered on public terminals from disclosure to third parties.

Busy Bees implements and maintains reasonable administrative, physical, and technical security safeguards to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction. Busy Bees has staff dedicated to maintaining this Privacy Policy and other privacy initiatives, periodically reviewing security, and making sure that every Busy Bees employee is aware of our security practices. Nevertheless, transmission via the internet is not completely secure and we cannot guarantee the security of information about you.

10. Notification of Changes

Busy Bees's Privacy Policy is periodically reviewed and enhanced as necessary. This Privacy Policy might change as Busy Bees updates and expands the Busy Bees Platform. Busy Bees will endeavor to notify you of any material changes by email. Busy Bees also encourages you to review this Privacy Policy periodically.

11. Children's Privacy

This service is intended for a general audience, and is not directed at children under 16 years of age. In certain jurisdictions, this minimum age may be higher. Please check the Jurisdiction-specific Provisions below for more information.

If you are a parent or guardian and you believe that we have collected information from your child in a manner not permitted by law, please get in contact with us. We will definitely and instantly remove the data.

We do not knowingly collect the Personal Information of minors under 16 years old.

12. Contacting Us

If you have any questions about this Privacy Policy or the manner in which we or our Third-Party Agents treat your Personal Information, the practices of the Site, your dealings with the Busy Bees Platform, or if you have technical problems, you may contact us via office@busy-bees.eu.

Busy Bees's staff will respond to all mail or email from Users with questions about privacy, including the types of Personal Information stored on the Busy Bees databases, and requests to know, delete or rectify such Personal Information.

13. Jurisdiction-specific Provisions

A. Residents of the European Economic Area (EEA), Switzerland, and the UK.

Interest-Based Advertising in the EEA or Switzerland. For more information about interest-based ads, or to opt out of having your web-browsing information used for behavioral advertising purposes, please visit <http://youronlinechoices.eu/>.

Additional Disclosures for Residents of the EEA, Switzerland, and the UK

Transfer Of Data. We and our affiliates and Third-Party Agents primarily store data about you, including Personal Information, on servers located and operated outside of Europe and outside of the United States. If you reside or are located outside of the U.S., we may transfer, store, and process your Personal Information (also referred to as personal data under the GDPR) in order to provide and operate the Busy Bees Platform. Whenever your personal data is transferred outside of the EEA, we undertake to ensure an adequate level of protection is afforded to it, either by us, our affiliates, and/or Third Party Agents, in accordance with applicable EEA and UK data protection law.

Your Rights. You have the following rights under certain circumstances:

- A right of access: you have the right to obtain confirmation as to whether personal data concerning you are processed or not and, if processed, to obtain access to such data and a copy thereof;
- A right to rectification: you have the right to obtain the rectification of any inaccurate personal data concerning you. You also have the right to have incomplete personal data completed, including by means of providing a supplementary statement;
- A right to erasure: in some cases, you have the right to obtain the erasure of personal data concerning you. However, this is not an absolute right and Busy Bees may have legal or legitimate grounds for keeping such data;
- A right to restriction of processing: in some cases, you have the right to restrict the processing of your personal data;

- A right to data portability: you have the right to receive the personal data concerning you which you have provided to Busy Bees, in a structured, commonly used and machine-readable format, and you have the right to transmit those data to another controller without hindrance from Busy Bees. This right only applies when the processing of your personal data is based on your consent or on a contract and such processing is carried out by automated means.
- A right to object to processing: you have the right to object at any time, on grounds relating to your particular situation, to processing of personal data concerning you when such processing is based on the legitimate interest of Busy Bees. Busy Bees may, however, invoke compelling legitimate grounds for continued processing. When your personal data are processed for direct marketing purposes, you have the right to object at any time to the processing of such data. You can change your marketing preferences at any time as described in Section 7, Your Rights and Choices.
- A right to lodge a complaint with the supervisory authority: if your request or concern is not satisfactorily resolved by us, you may approach [your local data protection authority](#). The Information Commissioner is the supervisory authority in the UK and can provide further information about your rights and our obligations in relation to your personal data, as well as deal with any complaints that you have about our processing of your personal data (<https://ico.org.uk/>). The CNIL is the supervisory authority in France. The Spanish Data Protection Agency is the supervisory authority in Spain. [This list](#) identifies the supervisory authorities for the 16 states in Germany. The CNPD (“Comissão Nacional de Proteção de Dados”) is the supervisory authority for Portugal. The *Garante per la protezione dei dati personali* is the supervisory authority in Italy.

You can exercise your rights by contacting us via office@busy-bees.eu.

EU-US Privacy Shield

Busy Bees is aware of the Schrems II judgment which invalidated the Privacy Shield as a matter of EU law. Busy Bees has decided, however, to maintain its certification not to legitimise the transfer of personal data under EU law, but as a matter of good practice.

Busy Bees complies with the EU-U.S. Privacy Shield Framework (Privacy Shield) as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of Personal Information transferred from the European Union and the United Kingdom, as applicable to the United States in reliance on Privacy Shield. Busy Bees has certified to the Department of Commerce that it adheres to the Privacy Shield Principles with respect to such information. If there is any conflict between the terms in this Privacy Policy and the Privacy Shield Principles, the Privacy Shield

Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>.

In compliance with the Privacy Shield Principles, Busy Bees commits to resolve complaints about our collection or use of your Personal Information. Individuals with inquiries or complaints regarding our handling of your Personal Information under the Privacy Shield should first contact Busy Bees via office@busy-bees.eu.

If we do not acknowledge your Privacy Shield complaint in a timely manner, or if your complaint is unresolved, please contact JAMS, our U.S.-based third-party dispute resolution provider (free of charge) at <https://www.jamsadr.com/eu-us-privacy-shield> to file a complaint. If neither Busy Bees nor JAMS resolves your complaint, you may, under certain circumstances, pursue binding arbitration under the Privacy Shield Panel. Additional information about binding arbitration can be found [here](#).

As explained in this Privacy Policy, Busy Bees may provide Personal Information to third parties to perform services on our behalf. If we transfer Personal Information received under the Privacy Shield to a third party, the third party's access, use and disclosure of your Personal Information must also be in compliance with our Privacy Shield obligations, and Busy Bees recognizes potential liability under the Privacy Shield for failure to do so by the third party.

Additional Disclosures for Residents of France, Spain & Italy

You have the right to give Busy Bees instructions concerning the use of your Personal Information after your death. You can exercise this right by contacting us via office@busy-bees.eu.

Busy Bees does not knowingly collect Personal Information from children under 16 years of age in France. The Busy Bees Platform is not directed to children under the age of 16 and children under 16 are not permitted to use the Busy Bees Platform. If we become aware that we have unknowingly collected Personal Information from a child under the age of 16, we will delete or disable such information. If you are a parent or guardian of a child under the age of 16 and you believe that your child has provided us with Personal Information, please let us know by contacting us via office@busy-bees.eu.