
PRIVACY AND DATA PROTECTION POLICY

THIS PRIVACY AND DATA PROTECTION POLICY DEFINES THE REGULATION OF THE RELATIONSHIP BETWEEN 4SERVICE HOLDINGS GMBH (HEREINAFTER COMPANY) AND YOU (HEREINAFTER MYSTERY SHOPPER OR OTHER DATA SUBJECT) AND STAKEHOLDERS REGARDING THE USE OF YOUR PERSONAL DATA.

ALL DATA SUBJECTS (INCLUDING MYSTERY SHOPPERS) AND OTHER SUBJECTS CONCERNED ARE REQUIRED TO READ THIS PRIVACY AND DATA PROTECTION POLICY TO UNDERSTAND HOW 4SERVICE HOLDINGS GMBH COLLECTS AND PROCESSES PERSONAL DATA WHILE CONDUCTING ITS ACTIVITIES AND WHAT SECURITY MEASURES ARE BEING APPLIED.

PRIVACY AND DATA PROTECTION POLICY OF 4SERVICE HOLDINGS GMBH IS APPLIED IN ALL COMPANIES OF THE 4SERVICE GROUP, WHICH ARE UNDER THE LEGAL AUTHORITY UNDER THE SUPERVISION OF OR CONTROLLED BY 4SERVICE HOLDINGS GMBH.

While conducting its activities, 4SERVICE HOLDINGS GMBH adheres all conditions and requirements stipulated by the current legislation of Austria, European legislation, including but not limited to, the GDPR as well as by other international legislative acts concerning data protection.

RECITALS

The General Data Protection Regulation 2016 (GDPR) replaces the EU Data Protection Directive of 1995 and supersedes the laws of individual Member States that were developed in compliance with the Data Protection Directive 95/46/EC. Its main purpose is to protect the “rights and freedoms” of natural persons (i.e. living individuals) and to ensure that personal data is not processed without their knowledge, and, wherever possible, that it is processed with their consent.

In collecting and using of personal data, the 4SERVICE HOLDINGS GMBH is subject to a variety of legislation controlling how such activities may be carried out and the safeguards that must be put in place to protect it.

The purpose of this Policy is to set out the relevant legislation and to describe the steps 4SERVICE HOLDINGS GMBH is taking to ensure that it complies with it.

This Policy applies to all 4SERVICE HOLDINGS GMBH employees, independent contractors (mystery shoppers), stakeholders and all other subjects that directly or indirectly participate in the personal data processing, including Data subjects, who visit the web-site www.4service-group.com (hereinafter Users) within 4SERVICE HOLDINGS GMBH activities.

DEFINITIONS

While processing the personal data, the definitions stated herein have the following meaning:

Personal data – any information relating to an identified or identifiable natural person (“individual”/“data subject”); an identifiable natural person is one who can be identified, directly

or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Special categories of personal data (sensitive data) – personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade-union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

Data controller (controller) – a natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

Data processor (processor) - a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

Data subject – any living individual who is the subject of personal data held by the Company, including Mystery Shoppers and other independent contractors/employers and other stakeholders.

Mystery Shopper – a data subject, who wishes to enter into a Mystery Shopper services contract or has entered into such contract with the Company in order to provide mystery shopper services, as described in such contract.

User – data subject, who has entered the Web-site with any purpose.

Processing – any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Profiling – is any form of automated processing of personal data intended to evaluate certain personal aspects relating to a natural person, or to analyses or predict that person's performance at work, economic situation, location, health, personal preferences, reliability, or behavior. This definition is linked to the right of the data subject to object to profiling and a right to be informed about the existence of profiling, of measures based on profiling and the envisaged effects of profiling on the individual.

Automated decision-making – is an ability to make decisions by technological means without human involvement.

Personal data breach – a breach of security leading to the accidental, or unlawful, destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed. There is an obligation on the controller to report personal data breaches to the supervisory authority and where the breach is likely to adversely affect the personal data or privacy of the data subject.

Data subject consent - means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data.

Child – is than anyone under the age of 14 years old. The processing of personal data of a child is only lawful if parental or custodian consent has been obtained. The controller shall make reasonable efforts to verify in such cases that consent is given or authorized by the holder of parental responsibility over the child.

Third party – a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data.

Filing system – any structured set of personal data which are accessible according to specific criteria, whether centralized, decentralized or dispersed on a functional or geographical basis.

Company – 4SERVICE HOLDINGS GMBH, legal entity duly registered under the laws of the Austria.

Website – the website www.4service-group.com which is owned by the Company.

Clients – legal entities, which consume the services of the Company.

Partners – legal entities the personal data might be transferred to with a purpose of their processing in the interests of the Company. Herewith, such partners can act as Processors as well as Sub-processors, depending on the circumstances.

Services – services provided by the Company via using the Software and the main conditions of which are stated on the Website.

Data Protection Authority (DPA) – means an independent public authority which is established by a Member State pursuant to the GDPR. In the contents of this Policy the DPA means an Austrian Data Protection Authority, that is located at the following address: Österreichische Datenschutzbehörde Wickenburggasse 8 1080 Vienna Austria / Europe Web-site: <https://www.data-protection-authority.gv.at>

STATEMENT

4SERVICE HOLDINGS GMBH, registered at the following address: Tegetthoffstraße 7, 1010 Vienna, Austria is committed to compliance with all relevant EU and Austrian laws in respect of personal data and protect the “rights and freedoms” of individuals while collecting and processing the personal data in accordance with the General Data Protection Regulation (GDPR).

This Privacy and Data Protection Policy (Policy) sets out how we the Company uses, processes and stores the Data Subjects’ personal information. The company may get that information from you or from its partners in order to deliver contractual obligations. In other cases, the Company will get that information from you with your permission and consent, or we may receive your

personal information from third parties who you have given consent to pass this information on to us.

This Policy describes the main steps the Company makes to be in compliance with the GDPR, herewith, other conditions of compliance along with connected processes and procedures, may be described by other relevant documents, which the Data Subjects and any other stakeholders may find at the appropriate reference links stated herein.

The Users have a right to apply to the Company or to the appropriate Data Protection Authority about his/her personal data breach if he/she becomes aware of it earlier than the Company.

PRINCIPLES OF PROCESSING

While conducting collecting and processing the personal data, the Company adheres the principles provided by the GDPR. The Company's policies and procedures are designed to ensure compliance with the principles.

(a) Lawfulness, fairness and transparency

Lawful – the controller identifies a lawful basis before to process the personal data. These are often referred to as the “conditions for processing”, for example consent.

Fairly – in order to process fairly, the controller has to make certain information available to the data subjects as practicable. This applies whether the personal data was obtained directly from the data subjects or from other sources.

Transparently – any information and communication relating to the processing of the personal data be easily accessible and easy to understand, and that clear and plain language be used;

(b) Purpose limitation

The personal data must be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with Article 89(1), not be considered to be incompatible with the initial purposes;

(c) Data minimization

The personal data must be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;

(d) Accuracy

The personal data must be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;

(e) Storage limitation

The personal data must be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for

archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with the GDPR Article 89(1) subject to implementation of the appropriate technical and organizational measures required by the GDPR in order to safeguard the rights and freedoms of the data subject;

(f) Integrity and confidentiality

The personal data must be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures.

PERSONAL DATA THE COMPANY COLLECTS AND PROCESSES

While conducting its activities, the Company collects and processes the following personal data:

1. The personal data of Mystery shoppers. It means that the Company processes, but not limited personal data of Mystery shoppers such as:

E-mail address, First Name, Last Name Date of Birth, Gender, Country, Postal Code, Password, PayPal, bank details, telephone, address, age, mouse activity on website <https://4service.shopmetrics.com>, <https://scheduling.shopmetrics.com>, <https://4servicero.shopmetrics.com> session duration and IP as if will be defined on the web-site www.4service-group.com device specific information, (such as hardware model, operation system version)

The company does not collect more personal data than it is needed for the purposes of processing specified herein.

While collecting and processing the personal data of Mystery Shoppers, the Company acts as the controller thus, the corresponding range of controller rights and responsibilities arises.

The Company collects and/or process the following sensitive data within its activities: sex of the Mystery shoppers.

2. The personal data of Users. It means that the Company processes, but not limited to, the Users' personal data as:

IP address, user's name, surname, address, phone number (landline or mobile), e-mail address, address, company name, country, email address, first name, last name, phone number, province, state and ZIP/Postal code, usage data, data about interaction with external social networks or platforms, information about registration and authentication on the web-site www.4service-group.com , geographic position.

THE PURPOSE OF PROCESSING

GDPR requirements

Under the GDPR, there should be specified one or more specific purposes for which the personal data are to be processed. Herewith, it is unlawful to collect and process personal data, not for the purposes defined earlier.

The personal data of Mystery shoppers is collected:

The personal data of the Mystery Shoppers are being collected and processed for the following purposes:

- execution of an assignments (tasks) by me under the Mystery Shopper Contract for Services and cooperation/interaction of me and **4Service Holdings GmbH** in frames of such Contract as it is stated in the Privacy notice, located at [Private Notice](#)

The personal data of Users

The personal data of the Users are being collected and processed for the following purposes:

- improve client services (It allows a more effective response to the requests from clients);
- personalization of Users' experience. It allows to determine who is more interesting in services);
- improve the Site. (It allows to improve the quality of products and services, convenience of their use, develop new Services enhance our products and services);
- communicate with User with newsletters, marketing or promotional materials and other information that include our news, updating, information about services with the remark on the instruction how to refuse from receiving follow-up emails.
- carry out statistical and other kinds of research and analysis based on anonymized data.
- provide personalized services to the User and perform agreements and contracts;
- participate of the User in various projects implemented by us through the Site, responding to queries addressed by User through the Site, research, maintenance of accounts and records and the promotion of services.

THE LAWFULNESS OF PROCESSING

GDPR requirements

Under the article 6 of the GDPR, there are six alternative ways in which the lawfulness of a specific case of processing of personal data may be established under the GDPR. This Policy has been drawn up to identify the appropriate lawful grounds for the processing and to document it in accordance with the GDPR.

The personal data of Mystery Shoppers

The **Mystery Shoppers'** personal data are being collected while the appropriate **Mystery Shopper** is registering on the Website 4service.shopmetrics.com. Herewith, the personal data are being collected via a consent, the providing of which is specified herein.

The Company processes the personal data on the basis of the consent that must be obtained from the Mystery Shopper in accordance with the GDPR requirements. Herewith, the consent is to be

provided upon to the Consent Request Form the Company provide the appropriate Mystery Shoppers with.

Along with the Consent Request Form, the Company provides the User with the Privacy Notice, which contains, including but limited to, the precise information concerning the purposes of processing and the information on methods of processing as well as on the period for which such personal data are to be stored.

The consent is considered to be provided to after the Mystery Shopper has pressed the “I accept” button on the appropriate Consent Request Form provided by the Company through the Website for each separate purpose of processing of the personal data, as it is stated in such Consent.

By giving the consent the Mystery Shopper acknowledges and accepts all terms and conditions specified in the Privacy Notice and Consent Request Form as well as all conditions specified in the current Policy.

Herewith, it worth to clarify that the Privacy Notice is to be provided to the Mystery Shoppers within the Website right before the appropriate consent/registering form is filled in.

The Company shall be able to demonstrate that consent was obtained for the processing operation if it is required.

The personal data of Users:

The Users’ personal data are being collected while the appropriate User is entering the Website www.4service-group.com. Herewith, the personal data are being collected via a consent, the providing of which is specified herein.

The Company processes the personal data on the basis of the consent that must be obtained from the User in accordance with the GDPR requirements. Herewith, the consent is to be provided upon to the Consent Request Form the Company provide the appropriate User with.

Along with the Consent Request Form, the Company provides the User with the Privacy Notice, which contains, including but limited to, the precise information concerning the purposes of processing and the information on methods of processing as well as on the period for which such personal data are to be stored.

The consent is considered to be provided to after the User has pressed the “I accept” button on the appropriate Consent Request Form provided by the Company through the Website for each separate purpose of processing of the personal data, as it is stated in such Consent.

By giving the consent the User acknowledges and accepts all terms and conditions specified in the Privacy Notice and Consent Request Form as well as all conditions specified in the current Policy.

Herewith, it worth to clarify that the Privacy Notice is to be provided to the Users within the Website right before the appropriate consent/registering form is filled in.

The Company shall be able to demonstrate that consent was obtained for the processing operation if it is required.

AGE OF THE MYSTERY SHOPPERS

GDPR requirements

The processing of the personal data of a child shall be lawful where the child is at least 16 years old. Where the child is below the age of 16 years, such processing shall be lawful only if and to the extent that consent is given or authorized by the holder of parental responsibility over the child. Herewith, the Member States may provide by law for a lower age for those purposes provided that such lower age is not below 13 years.

The personal data of Mystery Shoppers and Users

The Company collects the personal data on the basis of consent obtained from the individuals (Data subjects) who have reached the age of 14.

When the individual is below the age of 16 years, her/his personal data processing shall be lawful only if and to the extent that consent is given or authorized by the holder of parental responsibility over the child.

Registering on the Website and giving the Company the consent, the appropriate Mystery Shopper and/or User acknowledges that he/she reached the age of 14 and has all rights to provide to the Company the consent to his/her personal data processing. Herewith, the Company is not liable for any consequences if it becomes clear that the User has not reached the age of 16 at the moment of the consent providing.

WITHDRAWING OF CONSENT BY MYSTERY SHOPPERS AND USERS

The User/Mystery shopper is entitled to withdraw the consent at any time he/she wishes. The withdrawal of the consent is considered to be properly made after the User/Mystery shopper has filled in the appropriate form of withdrawal and sent such filled form to the next e-mail address: withdraw@4service-group.com or has filled the respective form at <http://4service-group.com/uk/privacy-policy/data-subject-consent-withdrawal-form-for-user/> / [Withdrawal of Consent form](#)

The personal data of Mystery Shoppers, collected by the Company, are being processed in accordance with the principles stipulated by the GDPR. The Company takes all adequate measures to ensure the compliance with the GDPR requirements while processing the Mystery Shoppers' personal data.

While processing the Mystery Shoppers' and Users' personal data, the automatic decision-making and profiling is not applied by the Company.

The appropriate request for withdrawing of the consent shall be examined within 72 hours since a moment the respective form of withdrawal is received, and the adequate decision will be made by the Company.

THE PERIOD OF STORAGE

GDPR requirements

Article 5 (1) (e) of the GDPR stipulates that the Personal data must be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) subject to implementation of the appropriate technical and organizational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject ('storage limitation');

The personal data of Mystery Shoppers

The Company processes and stores the Mystery Shoppers' personal data during the period that is needed for realization of the processing purposes, specified hereinabove. The period of storage may be longer than the period of processing.

Taking into account the purposes of processing, the period of storage of the Mystery Shoppers' personal data (period of storage) is no more than 24 months since the date the data processing consent is duly obtained from the Mystery Shopper, taking into account any statutory obligations the Company has to retain the data.

The personal data of Users

The Company processes and stores the Users' personal data during the period that is needed for realization of the processing purposes, specified hereinabove. The period of storage may be longer than the period of processing.

Taking into account the purposes of processing, the period of storage of the Users' personal data (period of storage) is no more than 24 months since the date the data processing consent is duly obtained from the User, taking into account any statutory obligations the Company has to retain the data.

General provisions

After an expiration of the period of storage, the Company is obliged to delete the personal data or ask the Mystery Shopper or User to provide the Company with a new consent if the necessity of processing remains actual for the Company or another purpose of processing appears.

The Company is entitled not to store more and delete the earlier collected Mystery Shoppers' or Users' personal data of at any time if such personal data are not needed more. Herewith, the Company is obligated to notify the respective Mystery Shopper/User about his/her personal data are deleted.

The Company may keep storing the personal data if a subsequent processing is foreseen by law and is deemed relevant for a purpose which is not compatible with the original purpose of processing stated in this Policy. Herewith, under the incompatible purposes means the purposes concerning archiving in the public interest, scientific, statistical or historical use.

SHARING THE PERSONAL DATA

The personal data of Mystery shoppers and Users

The Company does not sell or trade your personal data to any legal persons, individuals or Third Parties and does not share your personal data to any legal persons or individuals, except in the circumstances they are processors or sub-processors of the Company.

PROCESSORS/SUB-PROCESSORS

GDPR requirements

Whenever a controller uses a processor it needs to have a written Contract in place. The Contract is important so that both controller and processor understand their responsibilities and liabilities.

The personal data of Mystery shoppers and Users

While processing the Mystery Shopper' personal data, the Company engages processors which process the Mystery Shoppers' personal data only in accordance with the Company's instructions and within appropriate Contract concluded between them. In accordance with this Policy, the processors are: Shopmetrics Europe Ltd.

While processing the Users' personal data, the Company engages processors which process the Users' personal data only in accordance with the Company's instructions and within appropriate Contract concluded between them. In accordance with this Policy, the processors are: Google Analytics

The Company is responsible for the proper processing of the Mystery Shopper's and Users' personal data under the GDPR. Herewith, each processor is responsible for the adherence of the GDPR as well as for other legislative actions concerning data protection while processing the Mystery Shoppers and Users' personal data.

The processors are not entitled to define any additional purposes for the personal data processing.

Regarding purposes specified herein, **the Company's processors process the Mystery Shoppers' personal data in the following order:**

The personal data of Users are transferred to Google Inc for its processing with the purposes as it is stated above according to the Data transfer policy as it is stated herein, basing on the Agreement with Google Analytics.

The personal data of Mystery Shoppers are transferred to the Shopmetrics, Inc. for its processing with the purposes as it is stated above according to the Data transfer policy as it is stated herein, basing on the Agreement with Shopmetrics Europe LTD.

In some cases, we may transfer the personal data of Mystery shoppers to our Clients. It is done only in certain cases as follows:

- The respective Mystery shopper after receiving of the respective Privacy notice, where it is stated that the specific Mystery shopper personal data may be transferred to the Client of the Company for the purpose of execution of an assignments (tasks) by me under the Mystery Shopper Contract, as it is stated above, has provided the respective consent to process its personal data in the stated manner and transfer of it to the respective Client.

DATA SUBJECTS RIGHTS

GDPR requirements

Data subjects, the personal data of which are being processed by the Company have the rights, stipulated by the GDPR to the Data subjects.

1. The data subject's right of access. The Data subjects have a right to know whether their personal data are being processed and 2) if so, access such data with loads of additional stipulations stated in the GDPR Article 15.

2. The data subject's right to rectification. When the personal data the Data subjects provides the Company with are not inaccurate then, the respective Data subject is entitled to ask the Company to correct them indeed (*GDPR Article 16*).

3. The right to erasure or right to be forgotten. The Data subjects have a right to obtain from the Company the erasure of the Data subjects' personal data without undue delay and the Company shall have the obligation to erase such personal data without undue delay where the grounds, stated in the *GDPR Article 17 applies*.

4. The data subject right to restriction of processing. The Data subjects have a right to limit processing of their personal data with several exceptions under the scope of the GDPR in particular stated in the GDPR Article 18.

5. The right to be informed. The Company obliged to inform Data subjects what data is being collected, how it's being used, how long it will be kept and whether it will be shared with any third parties. This information must be communicated concisely and in plain language.

6. The right to data portability. The data subjects are permitted to obtain and reuse their personal data for their own purposes across different services. This right only applies to personal data that data subject has provided to the Company by way of the consent.

7. The right to object. The Data subjects can object to the processing of personal data that are being processed by the Company. The Company must stop processing personal data unless they can demonstrate compelling legitimate grounds for the processing that overrides the interests, rights and freedoms of the individual or if the processing is for the establishment or exercise of defense of legal claims.

8. The data subject right not to be subject to a decision based solely on automated processing. Data subjects have a right to object to any automated profiling that is occurring without consent. Herewith, the Data subjects have a right their personal data are to be processed with the human involvement.

The personal data of Mystery Shoppers and Users

To realize any of the above-mentioned rights, the Mystery shopper/User should click on respective menu and fill in the appropriate form at the web-page <http://4service-group.com/uk/privacy-policy/privacy-notice-form-for-data-subjects-users-of-the-web-site>

Detailed terms of realization of the above-mentioned rights are stated in the respective procedures, that are located at the web-page <http://4service-group.com/uk/privacy-policy/privacy-notice-form-for-data-subjects-users-of-the-web-site>

These are the timescales within which the Mystery Shoppers/Users may realize its rights, stated above:

Data Subject Request	Timescale
The right to be informed	When data is collected (if supplied by data subject) or within one month (if not supplied by data subject)
The right of access	One month
The right to rectification	One month
The right to erasure	Without undue delay
The right to restrict processing	Without undue delay
The right to data portability	One month
The right to object	On receipt of objection
Rights in relation to automated decision making and profiling.	Not specified

DATA PROTECTION OFFICER

GDPR requirements

A defined role of Data Protection Officer (DPO) is required under the GDPR if an organization is a public authority, if it performs large scale monitoring or if it processes particularly sensitive types of data on a large scale. The DPO is required to have an appropriate level of knowledge and can either be an in-house resource or outsourced to an appropriate service provider.

Based on these criteria, the Company, requires a Data Protection Officer. The information about Data protection Officer of the Company is located in web-site www.4service-group.com

SECURITY

GDPR requirements

Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, the controller and the processor shall implement appropriate technical and organizational measures to ensure a level of security appropriate to the risk.

The personal data of Mystery Shoppers and Users

The Company is responsible for ensuring that any personal data that Company holds and for which they are responsible, is kept securely and is not under any conditions disclosed to any third party unless that third party has been specifically authorized by Company to receive that information and has entered into a confidentiality agreement.

All personal data should be accessible only to those who need to use it, and access may only be granted in line with the Access Control Policy, which is located at www.4service-group.com. The Mystery Shoppers'/Users personal data shall be treated with the highest security and must be kept:

- *in a lockable room with controlled access; and/or*
- *in a locked drawer or filing cabinet; and/or*
- *if computerized, password protected in line with corporate requirements in the Access Control Policy, and/or*
- *stored on (removable) computer media which are encrypted.*

The **Mystery Shoppers/Users** are entitled to request the Company to clarify what security measures are applied while processing the appropriate **Mystery Shoppers'/Users** personal data.

DATA BREACH NOTIFICATION

GDPR requirements

Personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed.

There are three different kind of breaches under the GDPR:

- “Confidentiality breach” - where there is an unauthorized or accidental disclosure of, or access to, personal data.
- “Integrity breach” - where there is an unauthorized or accidental alteration of personal data.
- “Availability breach” - where there is an accidental or unauthorized loss of access to, or destruction of, personal data.

The personal data of Mystery Shoppers and Users

The Company takes all reasonable steps to minimize the risk of the personal data breach while processing the personal data.

In the case of a personal data breach, the Company shall without undue delay and, where feasible, not later than 72 hours after having become aware of it, notify the personal data breach to the Supervisory Authority competent in accordance with Article 55, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of Mystery Shoppers/Users.

The risk assessment the Company has to carry out will have determined whether the risk to the rights and freedoms of the data subjects affected is judged to be sufficiently high to justify notification to them.

Also, in the case of a personal data breach, which is likely to result in a high risk to the rights and freedoms of the Mystery Shoppers/Users, the Company shall without undue delay notify the appropriate User the personal data of which were breached.

However, if measures have subsequently been taken to mitigate the high risk to the Mystery Shoppers/Users, so that it is no longer likely to happen, then communication to the Mystery Shoppers is not required by the GDPR.

The Company documents all personal data breaches, comprising the facts relating to the personal data breach, its effects and the remedial action taken. That documentation shall enable the Supervisory Authority to verify compliance with the GDPR.

Under the GDPR the relevant DPA has the authority to impose a range of fines of up to four percent of annual worldwide turnover or twenty million Euros, whichever is the higher, for infringements of the GDPR.

The respective processor is obligated without undue delay to notify the Company about the breach of the Mystery Shopper/User personal data while processing such personal data under the Company’s instructions.

DATA TRANSFER

GDPR requirements

Any transfer of personal data which are undergoing processing or are intended for processing after transfer to a third country or to an international organisation shall take place only if, subject

to the other provisions of the GDPR, the conditions laid down in the GDPR Chapter 5 are complied with by the controller and processor, including for onward transfers of personal data from the third country or an international organisation to another third country or to another international organisation. All provisions in the GDPR Chapter 5 shall be applied in order to ensure that the level of protection of natural persons guaranteed by the GDPR is not undermined.

The European Commission has the power to determine, on the basis of article 45 of the GDPR whether a country outside the EU offers an adequate level of data protection, whether by its domestic legislation or of the international commitments it has entered into. Under the appropriate Decision of EU Commission, the personal data can flow from the EU (and Norway, Liechtenstein and Iceland) to that third country without any further safeguard being necessary.

The European Commission has so far recognized **Andorra, Argentina, Canada (commercial organizations), Faroe Islands, Guernsey, Israel, Isle of Man, Jersey, New Zealand, Switzerland, Uruguay and the US (limited to the Privacy Shield framework)** as providing adequate protection.

Privacy Shield

If it required to transfer personal data from the EU to an organisation in the United States it should check that the organisation the personal data are transferred to, is signed up with the Privacy Shield framework at the U.S. Department of Commerce. The obligation applying to companies under the Privacy Shield are contained in the “Privacy Principles”. The US DOC is responsible for managing and administering the Privacy Shield and ensuring that companies live up to their commitments. In order to be able to certify, companies must have a privacy policy in line with the Privacy Principles e.g. use, store and further transfer the personal data according to a strong set of data protection rules and safeguards. The protection given to the personal data applies regardless of whether the personal data is related to an EU resident or not. Organizations must renew their “membership” to the Privacy Shield on an annual basis. If they do not, they can no longer receive and use personal data from the EU under that framework.

The personal data of Mystery Shoppers/Users

The Company may transfer the Mystery Shoppers’ personal data to its processors, specified hereabove and which are registered European Union, it must be understood that the Company transfers the personal data based on GDPR and adequacy decision if needed.

The personal data are being transferred for the purposes defined herein and on the other conditions of processing stipulated by this Policy and specified in other Documents in particular in the Personal Data Transfer Policy, which can be found at the next link: www.4service-group.com

ADDRESSING COMPLIANCE TO THE GDPR

The following actions are undertaken to ensure that the Company complies at all times with the accountability principle of the GDPR:

- The legal basis for processing personal data is clear and unambiguous;
- All staff involved in handling personal data understand their responsibilities for following good data protection practice;
- Training in data protection has been provided to all staff;
- Rules regarding consent are followed;
- Routes are available to data subjects wishing to exercise their rights regarding personal data and such enquiries are handled effectively;
- Regular reviews of procedures involving personal data are carried out;
- Privacy by design is adopted for all new or changed systems and processes;

These actions are reviewed on a regular basis as part of the management process concerned with data protection.

The Company has developed all internal documents to define roles among staff concerning the personal data processing within the Company.

ADDITIONAL CONDITIONS

A current version of this Policy is available to all subjects concerned on the Website at the following link: <https://en.scheduling-europe.com/privacy-policy-2018.pdf>

The Company may revise this Policy from time to time. If the Company makes material changes to this Policy, we will notify you by email or by posting a notice on the website prior to the effective date of the changes. By continuing to access or use the website after those changes become effective, you agree to the revised Policy.

This Policy was approved by the Managing Director on 20th of May 2018 and is issued on a version-controlled basis under the signature of the Managing Director.