# **Privacy Policy**

### 1. Definitions

FOAM Schuhreinigung GmbH (further referred as FOAM): Company operating a shoe care and cleaning business.

Client: Any individual or corporate entity that utilizes services offered by FOAM, including but not limited to cleaning and care services for shoes, or purchases products sold by FOAM.

Service: A solution offered by FOAM to the Client, encompassing a range of cleaning, care, and maintenance services that can be applied to the pair of shoes (also referred to as items) provided by the Client. These services may include, but are not limited to, shoe cleaning, repairs, and maintenance. Every service is priced to provides the customers associated costs.

Product: A purchasable physical item offered by FOAM for its customers. The product range includes, but is not limited so, cleaning brush, cleaning foam, and a branded tote bag.

Order: A single or combined selection of services chosen by the client for FOAM to perform on one or more pairs of shoes provided by the client. An order specifies the type and quantity of services requested.

### 2. Main Clauses

- When establishing a customer-business relationship with FOAM, the Client agrees and is bound by FOAM's Privacy Policy and the company's Terms & Conditions agreement.
- FOAM's Privacy Policy offers a comprehensive explanation of how we intend to utilize the personal information collected through our website and personal information forms.
- In case of disagreeing with one or more parts of Terms & Conditions or the Privacy Policy, the Client should refrain from using FOAM's services and purchasing products offered by FOAM.
- FOAM's Privacy Policy is readily available is provided alongside the Terms & Conditions agreement on FOAM's official website and is prominently displayed at FOAM's physical premises, ensuring that it is easily noticeable and accessible.

### 3. FOAM's Responsibility in Client's Privacy

FOAM is dedicated to safeguarding the privacy of the Client. We understand that personal data is a private and valuable asset, and we take stringent measures to ensure its protection. FOAM is committed to keeping personal information secure and inaccessible to third parties. The company maintains strict controls and security measures to prevent unauthorized access, use, or disclosure of your data.

FOAM collects and uses personal data only in ways that are permitted by law. Client's personal data is considered confidential, and we adhere to the principles outlined in the General Data Protection Regulation (GDPR), the Austrian Data Protection Act (DSG 2018), and other applicable privacy laws and regulations. FOAM cares about the protection the Client data and complies with applicable data protection laws and regulations to ensure their privacy and security. This Privacy Policy serves as a commitment to transparency and safeguarding the personal data provided to FOAM.

# 4. Client's Responsibilities

By choosing to make use of FOAM's services, you acknowledge and accept that you share personal information with us. We expect the Client to:

- Provide truthful and accurate personal information.
- Refrain from using deceptive or fraudulent information.
- Understand that by making an order with FOAM, browsing our website, or interacting
  with FOAM through social media and contact channels, you agree to the details of
  this Privacy Policy.

The Client is responsible for the information they provide, and the accuracy of the data shared. Deceptive practices or misuse of personal information may result in actions taken by FOAM as outlined in this Privacy Policy.

### 5. Data Collection

### 4.1 Order Information

FOAM collects personal data from the Client when the footwear is brough and dropped off at the company's location. The data is used to create a service order to track the execution of the agreed services, store details about what services are to be performed, and save before and after photos of the shoe. The personal data collected includes:

- Name of the person who drops off the shoes
- Name of the person who collects the shoes after cleaning or service application
- New or returning client status.
- How the Client found out about FOAM
- Number of shoe pairs dropped off
- What types of services are agreed to be executed
- Photos of the footwear before the services are performed
- Contact information (email and/or phone number) for sending notifications regarding the readiness of the shoes for collection.

The data collection process comprises FOAM employees asking necessary information from the Client. Every filled in order is marked with an identification number. FOAM retains the personal information and order numbers for order management and

inventory control purposes. The company uses this personal data internally to conduct demographic and trend analyses of its client base. The conclusions of the analyses support FOAM's management in making business development decisions, via which the company aspires to enhance major performance indicators, such as (including but not limited to) customer satisfaction, return ratio, and service lead time.

### 4.2 Website & Social Media

FOAM collects general statistical information about website visitors and social media interactions. This data is collected through various analytical tools, but no personally identifiable information (PII) such as names or dates of birth is exposed. The information collected includes:

- Number of daily / weekly / monthly visitors
- Click-through rates
- Action rates (e.g., how many times button "call us" has been pressed"
- Most-visited pages on FOAM's website
- Social media user age, location, and interactions with FOAM's posts (likes and reactions).

FOAM uses tools available on the web, including but not limited to WordPress addins, Google Analytics, and Instagram Analytics. Data is automatically recorded when the Client performs specific actions, such as liking FOAM's social media posts, visiting website pages, or interacting with the company via contact information.

Client's complete understanding of the Privacy Policy and the Terms & Conditions agreement are of utmost importance for FOAM. Any questions, comments, or concerns regarding data privacy can be addressed to FOAM's employees at the company's premises, publicly shared corporate contact details, or social media profiles.