



Data protection policy

www.needhelp.com

1. Introduction

This Confidentiality Policy is intended to inform you about the methods of collecting and using your Personal Data by Needhelp, as well as your rights in terms of the protection of personal data under applicable European national legislation and European Regulation 2016/679 of 27 April 2016 regarding the protection of data, called “GDPR”.

The entity processing your data is WE SHARE TRUST SAS (hereinafter “Needhelp”) with a capital of Eur 91,316, registered in the PARIS Trade and Companies Register under number B 799 782 859, VAT FR45799782859, whose registered office is located at 5 Villa Victor Hugo, 75116 PARIS.

The NeedHelp website is hosted by Amazon Web Services LLC (AWS) P.O. Box 81226 Seattle WA 98108-1226 - USA, on servers located in Europe.

Needhelp has designated a data protection officer, a “DPO”. You may contact the latter at the following email address: dpo@needhelp.com

2. Does this confidentiality policy affect you?

Needhelp allows Jobbers registered on the platform to provide services to its Clients. Jobbers use Needhelp’s platform through which they carry out their activities in order to offer these services to Needhelp Clients.

When you submit a job offer and/or select a jobber for a defined job, you may also be asked to register with the services provided by Needhelp, that allow you to transfer funds or make payments via the sites of Needhelp’s . In this case, Needhelp collects and processes your Personal Data in order to provide their services. This Confidentiality Policy applies if you have registered to Needhelp’s services in the capacity of a physical person.

This Confidentiality Policy may also affect you if you are a physical person related to a Partner of Needhelp, or to a legal person having registered to Needhelp’s services. In effect, all Partners as well as all legal persons that register with the services are asked to transmit information regarding physical persons (their legal representative, the physical persons that have the authority to use the services on behalf of the legal person, or the beneficial owners* of the legal person).

Furthermore, if you have made a payment by card on a Partner site using a Needhelp payment page, the Confidentiality Policy applies to the Personal Data processed for the purposes of carrying out the transaction.

* The beneficial owners are physical persons who hold, directly or indirectly, more than 25% of capital or voting rights of the company, or exercise, by any other means, supervisory power over the company.

3. Special notes for Clients

In the following we will describe how we process data when you book household services via our platform and request the service of a cleaner.

3.1. Booking of services

To book services via our website you are required to register with us and create your own NeedHelp account. This profile is necessary to identify potential service providers that offer their services in the area requested and based on additional criteria you put forward.

We collect the following information:

First name, last name, email address, telephone number, street, house number, additional address information, postcode, city, preferred method of payment (hereinafter combined referred to as “user profile data”); type of service requested and additional services as well as the date, time and duration of the requested service; information if service is one-off or recurring (hereinafter combined referred to as “booking data”); time of user profile creation and update;

In addition, you are able to specify the following information on a voluntary basis:

Presence of domestic animals, disposal site for waste, availability of parking spots, specification of special needs (e.g. certain priorities or rooms, which should not be included in the service requested), possible requirements regarding materials & equipment, information on how the

service provider can access your apartment (e.g. keys are with neighbour or you are at home).

NeedHelp transfers the user profile data, booking data and possible additional information provided by you on a voluntary basis for the purpose of arranging services to service providers you selected during the booking process plus potentially other service providers that fit your booking criteria.

If a booking request is accepted and a contract between you and a jobber is confirmed NeedHelp also processes your user profile data for the purpose of booking support, fulfilment, completion, accounting and follow-up assistance of the respective booked services as well as contracts including additional related actions such as invoices, credit, claims, cancellations etc.

On top of that we use user profile data, especially your telephone number, to send out automated messages to notify and remind you of upcoming events and services.

NeedHelp also uses the booking data to the required extent to invoices for the delivered services of the partner and any following necessary assistance (e.g. in case of inadequate service delivery of jobber).

In addition we transfer, depending on the chosen method of payment, your credit card data (card number, expiry date, security code) or your bank account details (hereinafter also referred to as “payment data”), that NeedHelp collects in connection to the booking, to the licensed payment provider MANGOPAY S.A. MANGOPAY SA a société anonyme [joint-stock company] governed by Luxembourg law, with capital of 12,700,000 euros, the registered office of which is located at 2 Avenue Amélie, L-1125 Luxembourg and registered in the Luxembourg Business and Companies Registry under number B173459, cooperating with us for the purpose of handling of payments (hereinafter referred to as “payment

provider”). The payment provider is collecting, processing and using the payment data for the purpose of handling payments respectively collecting the receivables from your bank account. There is no additional storage of your payment data.

As part of our fulfilment, we store the services you booked and that were delivered by a jobber including created invoices in your user profile, so that we are able to provide access to this information at a later point in time.

The legal basis for the described data processing is Article 6, paragraph 1, (b), GDPR.

3.2. Reviews

If you are leaving a review about a delivered household service, NeedHelp will process the data provided by you for the purpose of displaying the review on our platform. Legal basis of this data processing is Article 6, paragraph 1, (b), GDPR.

3.3. Advertising consent for your user profile data

If you have consented to receiving promotional offers from us, we process and use your user profile data, booking data and additional data as well as your access time of your user profile to understand your usage habits better and to contact you with informative information on additional services that might be of interest for you. You can withdraw your consent for promotional purposes (e.g. Newsletter) at any time using the unsubscribe link available in every email as well or by sending an email to contact@needhelp.com. Legal basis for this processing is Article 6, paragraph 1, (a), GDPR.

3.4. Update/Deletion of profile data

You are able to update your additional information and user data at any

time in your user profile. If you want to delete your user profile NeedHelp will block your data first and then delete afterwards.

4. Special notes for jobbers and service providers

4.1. Registration and mediation

If you are registering as a jobber on our platform NeedHelp processes the following data for the purpose of being able to initiate and potentially close a contract with you regarding the arrangement of household services:

First name, last name, email address, street, house number, postcode, city, nationality, date of birth and telephone number (hereinafter combined referred to as “partner profile data”), information on whether you are allowed to work as self-employed, your previous cleaning experience, information on your access to means of transportation, your bank details, your language skills, information on the work area and the potential timeframe of your availability and your access to different means of communication (mobile phone, smartphone, internet access) (hereinafter combined referred to as “data jobber”). In addition, you are able to provide / upload a picture of yourself as well as short description of yourself.

NeedHelp stores your profile data and such information that is created as part of the accounting of arranged jobs in a profile for jobbers, which can be accessed by you. Some of the stored profile data will also be published on our website, especially your first name, picture and short description.

Cleaner profile data is used by NeedHelp for the purpose of fulfilment, completion and accounting of booked services as well as contracts

including additional related actions such as invoices, credit, claims, cancellations etc and is stored in the respective profile.

In addition, NeedHelp uses jobber profile data, especially your telephone number, to send out automatic messages to notify and remind of upcoming events & jobs.

Legal basis for this data processing is Article 6, paragraph 1, (b), GDPR.

4.2. Reviews

If a user leaves a review on our platform, NeedHelp will process this data for the purpose of displaying the review on the platform. Reviews are an integral part of our platform to ensure the utmost transparency for users.

Legal basis for this data processing is Article 6, paragraph 1, (b), GDPR.

4.3. Deletion

In case you want to delete your NeedHelp profile, NeedHelp will block your data first and then delete afterwards.

5. Communication via our platform

We offer users and service providers the opportunity to communicate directly with each other via our platform. In order to be able to offer this service, it is necessary for us to store and process the communication contents. The service is part of the platform provided by us. The legal basis for this type of data processing is Article 6, paragraph 1, (b), GDPR. The use of this service is voluntary.

We treat this communication data confidentially. As a matter of principle, we do not take note of the contents. However, we reserve the right to manually check the communication content in individual cases if there are grounds to suspect that the service is being used to circumvent our

platform or otherwise to engage in fraudulent conduct or that the use otherwise violates our Terms of Use or legal regulations. In this case, the processing of data by us is based on the legal basis of Article 6, paragraph 1, (f), GDPR and serves our legitimate interest in preventing misuse of our platform.

The communication contents are stored until the profile used on the platform is deleted.

6. Processing Server Log Files

When using our website for informational purposes only, general data is initially stored automatically (i.e. not via registration) and transmitted to our server by your browser. By default, these include: the browser type/version, the operating system used, the page accessed, the page previously visited (referrer URL), the IP address, the date and time of the server request and the HTTP status code.

The processing is carried out for the purposes of our legitimate interests, the legal basis of which is Article 6, paragraph 1, (f), GDPR. This processing is used for technical administration and website security. Stored data will be deleted after seven days unless there are concrete reference points for potential unlawful use that require further examination and processing of this data.

7. Blog

We offer a blog on our website in which we publish articles on various topics. Our blog includes a commenting functionality, which requires the entry of personal data if used. In case you are leaving a comment, this comment will be published with the user name you provided in the

respective article. We thus recommend that you use a pseudonym instead of using your full name as your user name. To use the commenting function, it is mandatory to provide an email address and user name. All other data provided is made on a voluntary basis. Legal basis for this data processing is Article 6, paragraph 1, (b), GDPR.

When you are posting a comment we also store your IP address in addition to the aforementioned data. Legal basis for the storage of your email address and your IP address is Article 6, paragraph 1, (f), GDPR. We will only use your email address in case a third party notifies us about unlawful content and we will need to examine the incident. Your IP address is stored for the purpose of being able to defend ourselves against third party rights in case you posted unlawful content. Your email address is stored for as long your comment is publicly visible. Your IP address is deleted one week after your comment was published.

In general, we do not check posted comments before publishing. We do nevertheless reserve the right to delete your comments, if third parties claim that the comment is unlawful. You are able to object to the storage of the mentioned data at any time. In this case we need to delete your comment from our website.

8. Job Applications

You can apply for an open position with us through our website. To this end, we collect personal contact data from you, which specifically includes your name, your CV, your cover letter and other content provided by you.

We use “Welcometothejungle.com”, provided by CORUSCANT, SAS, France, as a software partner for application processing. They are strictly bound by our instructions based on statutory requirements for order data

processing. Please also refer to additional data protection guidelines on the career section of our website.

Your personal application data will only be collected, stored, processed and used for purposes in connection with your interest in current or future employment with us and the actual processing of your application. Your online application will only be processed and handled by the relevant contact people in our company. All employees entrusted with data processing are obliged to maintain the confidentiality of your data.

If we store your application data for longer than six months and you have specifically agreed to this, we inform you that this consent can be withdrawn at any time based on Article 7, paragraph 3 GDPR. Withdrawal of the consent does not affect the legality of processing done until you declared your withdrawal.

In case we are unable to offer you any employment, we will keep the data provided by you for up to six months after the end of the application process for the purpose of answering questions in relation to your application and rejection. This is not applicable in case there are statutory obligations preventing a deletion, the continued storage is needed for the purpose of evidence documentation or you have specifically agreed to a longer period of storage.

9. Messages to us

If you send us a message via one of the mentioned means of communication, we will process the data provided by you only to handle your request. Legal basis for this data processing is Article 6, paragraph 1, (b), GDPR.

10. Newsletter

10.1. Subscription and Cancellation

We offer the option to subscribe to our newsletter on our website. To receive our newsletter, you will need a valid email address and your name. To verify your email address, you will first receive a subscription email, which you need to confirm (double opt-in).

We are sending you our newsletter on the basis of your confirmation (Article 6, paragraph 1, (a), GDPR). You can stop receiving our newsletter at any time in the future. You can do so easily by using the unsubscribe link available in any email or contact us via one of our mentioned communications channels (e.g. at contact@needhelp.com)

By registering for the newsletter, we will save your IP address and date and time of registration. The processing of this data is necessary to provide evidence of the registration process in accordance with statutory requirements.

10.2. Analysis

We analyse the reading habits and open rates of our newsletters. We therefore collect and process pseudonymized usage data, which we will not compare to your email or IP address. Legal basis for the analysis of our newsletters is Article 6, paragraph 1, (f), GDPR and serves our legitimate interest to optimize our newsletters. You can withdraw your consent at any time by contacting us via one of the mentioned contact channels.

10.3. Newsletter service

We use the newsletter service SendinBlue, a service provided by SENDINBLUE – 55 rue d'Amsterdam, 75008 Paris, France, hereinafter referred to as "Sendinblue". Sendinblue works with us as a data

processor, is strictly bound by instructions and contractually committed to ensure adequate technical and organizational data protection measures.

We use the newsletter service Mailjet, a service provided by Mailgun Technologies, Inc., a Delaware corporation (“Mailgun”) on its own behalf and on behalf of its Affiliates (collectively “Mailgun Group”). Mailgun Group works with us as a data processor, is strictly bound by instructions and contractually committed to ensure adequate technical and organizational data protection measures.

11. Cookies

We use cookies on our website. Cookies are small text files that are stored by your browser when you visit a website. This identifies the browser used and can be recognized by our web server. Insofar as this use of cookies results in the processing of personal data, the legal basis for this is Article 6, Paragraph 1, Point (f), GDPR. This manner of processing serves our legitimate interest in making our website more user-friendly, effective and secure.

Most of the cookies we use are known as “session cookies”. They are deleted after the end of your visit. Other cookies (“persistent cookies”) are automatically deleted after a specified period, which may vary depending on the cookie. You can delete cookies at any time in the security settings of your browser. You can object to the use of cookies in principle or in specific cases through your browser settings.

12. Analysis of our website

12.1. Google Analytics

Our website uses Google Analytics, a web analysis service from Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043 USA, hereinafter referred to as “Google“. Google Analytics employs cookies. The information generated by these cookies about your usage of our

website is usually transmitted to a Google server in the USA and stored there. Google will use this information on our behalf to evaluate user usage of our site, to compile reports on website activity for us, and to provide other services related to website and internet usage. It is possible to create pseudonymous user profiles using this information.

We use Google Analytics only with an active IP anonymization feature on our website. In doing so, Google abbreviates and thereby anonymizes your IP address within member states of the European Union or signatory states to the Agreement on the European Economic Area. Only in exceptional cases, the full IP address is transferred to a Google server in the USA and is abbreviated there. The IP address transmitted by your browser within the context of Google Analytics will not be combined with any other data held by Google.

The legal basis for the use of this service is Article 6 (1) (f) GDPR and serves our legitimate interest to ensure a needs and demand-driven layout of our website and services.

You may prevent or stop the data processing at any time. To do this you can download and install a browser plugin that blocks tracking services or can adjust the settings on your browser software accordingly to prevent cookies from being installed.

Google is certified under the Privacy Shield Agreement and thus guarantees compliance with European data protection legislation. See more here.

13. Tracking & Retargeting

13.1. Facebook (visitor action pixels)

Our website uses “visitor action pixels” from Facebook Ireland Ltd., 4

Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland, hereinafter referred to as “Facebook”.

The visitor action pixel allows user behavior to be tracked after they have been redirected to the provider’s website by clicking on a Facebook ad. This enables us to measure the effectiveness of Facebook ads for statistical and market research purposes. The data collected in this way is anonymous to us, i.e. we do not see the personal data of individual users. However, this data is stored and processed by Facebook, which is why we are informing you, based on our knowledge of the situation. Facebook may link this information to your Facebook account and also use it for its own promotional purposes, in accordance with Facebook’s Data Usage Policy. See more [here](#).

The visitor action pixel is triggered by Facebook when visiting our website and may store a cookie on your device. If you log into Facebook after this or visit our website when logged into Facebook, the visit to our website will be linked to your account. The personal data collected still remains anonymous to us and does not allow us to make any assumptions about the identity of users. This data is nevertheless stored and processed by Facebook, so that it might be possible to link this to respective user accounts and can be used for market research or other promotional purposes by Facebook.

The legal basis for the use of this service is Article 6 (1) (f) GDPR and serves our legitimate commercial interests.

You can object to the collection of your data by Facebook pixel, or to the use of your data for the purpose of displaying Facebook ads [here](#)

Facebook is certified under the Privacy Shield Agreement and thus guarantees compliance with European data protection legislation. See more [here](#).

13.2. Facebook Custom Audiences

Our website uses "Custom Audiences", provided by Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland, hereinafter referred to as "Facebook". A remarketing pixel is integrated on our website through which Facebook can capture users of our website and use their data as basis for ads (Facebook Ads). Through this pixel, general information on your browser session will be sent to Facebook as well as an irreversible checksum (hash value) – not specific to the individual - which is generated from your Facebook ID. Further information on Facebook's use of data and your rights and settings options to protect your personal data are available [here](#).

The legal basis for the use of this service is Article 6 (1) (f) GDPR and serves our legitimate commercial interests.

Should you wish to disable Facebook Website Custom Audiences in the future you can opt out [here](#).

Facebook is certified under the Privacy Shield Agreement and thus guarantees compliance with European data protection legislation. See more [here](#).

13.3. Google Marketing Services

Our website uses marketing and remarketing services of Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA, hereinafter referred to as "Google". These services allow us to display advertisements in a more targeted manner in order to present advertisements of interest to users. Through remarketing, ads and

products are displayed to users relating to an interest established by activity on other websites within the Google network. For these purposes, a code is used by Google when our website is accessed and what are referred to as (re)marketing tags are incorporated into the website. With their help, an individual cookie, i.e. a small file, is stored on the user's device (comparable technologies may also be used instead of cookies). Cookies can be set by various domains, including google.com, doubleclick.net, invitemediam.com, admeld.com, googlesyndication.com or googleadservices.com. This file records which apps users have visited, which content they are interested in and which offers have been used. In addition, technical information about the browser and operating system, referring websites, the length of the visit as well as any additional data about the use of the online products and services are stored. The IP address of users is also recorded, although we would like inform you that within the framework of Google Analytics, IP addresses within member states of the European Union or in other contracting states to the Agreement on the European Economic Area are truncated.

All user data will only be processed as pseudonymous data. Google does not store any names or email addresses. All displayed ads are therefore not displayed specifically for a person, but for the owner of the cookie. This information is collected by Google and transmitted to and stored by servers in the USA.

One of the Google marketing services we use is the online advertising program Google AdWords. In the case of Google AdWords, each AdWords customer receives a different conversion cookie. Cookies can therefore not be tracked through the websites of AdWords customers. The information collected by the cookie is used to generate conversion statistics for AdWords customers who have opted for conversion tracking. AdWords customers see the total number of users who clicked on their ad and were redirected to a page with a conversion tracking tag. However, they will not receive any information that personally identifies users.

We may include third-party advertisements based on the Google Marketing Service called DoubleClick. DoubleClick uses cookies to enable Google and its partner websites to place ads based on users' visits to this website or other websites on the Internet.

More information about Google's use of data regarding sites that use Google Services can be found [here](#). General information on the use of data for marketing purposes is available [here](#).

The legal basis for the use of this service is Article 6 (1) (f) GDPR and serves our legitimate commercial interests.

If you wish to object to interest-based advertising by Google marketing services, you can do so using the settings and opt-out options provided by Google [here](#).

Google is certified under the Privacy Shield Agreement and thus guarantees its compliance with European data protection legislation. See more [here](#).

13.4. Microsoft Bing Ads

We use the conversion and tracking tool Bing Ads from Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, hereinafter referred to as "Microsoft" on our website. Microsoft stores a cookie on the user's computer to enable an analysis of the use of our online services. The prerequisite for this is that the user has accessed our website through an ad from Microsoft Bing Ads. This enables Microsoft and us to know that someone has clicked on an ad, has been redirected to our online services and has reached a predetermined target page. We only see the total number of users who clicked on a Bing ad and were then forwarded to the target page (conversions). No IP addresses are stored.

No other personal information about the identity of the user will be disclosed.

The legal basis for the use of this service is Article 6 (1) (f) GDPR and serves our legitimate commercial interests.

If you do not wish to participate in the Bing Ads tracking process, you can communicate your objection to Microsoft [here](#). Users can find further information on data protection and the cookies used at Microsoft Bing ads in Microsoft's data protection declaration [here](#).

Microsoft is certified under the Privacy Shield Agreement and thus guarantees compliance with European data protection legislation: [here](#).

14. Social Plug-Ins

We use Social Plugins on our website, hereinafter referred to as "Plugins". These plugins allow you to share content from our website on different social networks. To integrate a plugin on our website the plugin's program-code is directly transferred from the servers of the respective provider of the plugin when accessing our website. It is therefore a technical necessity to submit the used IP address. This submission happens independently of your interaction with the plugin (e.g. if you clicked on the Facebook "Like" button). If you are logged into your user account with the respective social network while visiting our website, or interact with the plugin, further data may be transferred. Additional information is available via the third-party companies providing these plugins (see below):

The data processing serves our legitimate commercial interest to increase the reach of our website. The legal basis for this is Article 6 (1) (f) GDPR.

We have integrated the following third-party plugins on our website:

The plugin of the social network facebook.com , operated by Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland, hereinafter referred to as "Facebook". Facebook is certified under the Privacy Shield Agreement and thus guarantees compliance with European data protection legislation. Learn more [here](#). Data Protection Guidelines of Facebook as well as information on setting options to protect your privacy at Facebook are available [here](#).

15. Integrated services and third-party content

We use services and content provided by third parties on our website. For this kind of integration, it is technically necessary to process your IP address so that the content can be sent to your browser. Your IP address will therefore be transmitted to the respective third-party provider.

In each case, this data processing is carried out to safeguard our legitimate interests in the optimization and the commercial operations of our website.

The Java programming language is regularly used to integrate content. Therefore, you can object to data processing by deactivating Java operations in your browser. Please note that this might restrict the usage of our website.

For displaying maps we use "Google Maps", which is provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA, hereinafter referred to as "Google". Google is certified under the Privacy

Shield Agreement and thus guarantees compliance with European data protection legislation. Learn more [here](#).

For displaying videos we are using “YouTube”, provided by YouTube LLC, 901 Cherry Ave., San Bruno, CA 94066, USA, hereinafter referred to as “YouTube“. YouTube is a daughter company of Google and thus included in their Privacy Shield certification.

16. Withdrawal of consent

You are entitled to withdraw your consent to data processing in accordance with Article 7, Paragraph 3 GDPR. Withdrawal of consent does not affect the legality of processing done before you declared your withdrawal.

17. Your rights

As the person concerned, you are entitled to exercise your rights against us. In particular, you have the following rights:

In accordance with Article 15 GDPR, you have the right to request information as to whether or not, and to what extent, we process personal data about you.

You have the right to have us correct your data in accordance with Article 16 GDPR.

You have the right to have us delete your personal data in accordance with Article 17 GDPR.

You have the right to have the processing of your personal data restricted in accordance with Article 18 GDPR.

You have the right, in accordance with Article 20 GDPR, to receive the personal data concerning you that you have provided to us, in a structured, commonly used and machine-readable format and to transmit this data to another controller.

18. Right to object

In accordance with Article 21 GDPR, you have the right to object to any processing operations executed that use Article 6, Paragraph 1, Points (e) and (f) GDPR as their legal basis. If personal data was used by us for the purpose of direct mail you may also object to this processing in accordance with Article 3, Paragraph 2 and 3 GDPR.