Privacy Policy

Effective Date: 27 April 2025

Introduction

Fresca Vida ("we," "our," or "us") is committed to protecting and respecting your privacy. This Privacy Policy explains how we collect, use, disclose, and safeguard your personal data when you visit our website https://frescavida.co.uk/ (the "Site") and use our cleaning services.

Data Controller

The Site is owned and operated by James Sturmay. James Sturmay is the data controller and can be contacted at:

• Email: admin@frescavida.co.uk

• Mailing Address: 124 City Road, London, England, EC1V 2NX

Purpose of This Privacy Policy

The purpose of this Privacy Policy is to inform users of our Site of the following:

- 1. The personal data we collect;
- 2. How we use collected data;
- 3. Who has access to the data collected:
- 4. The rights of Site users.

This Privacy Policy applies in addition to the terms and conditions of our Site.

GDPR Compliance

For users in the European Union, we adhere to Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, known as the General Data Protection Regulation (the "GDPR"). For users in the United Kingdom, we adhere to the GDPR as enshrined in the Data Protection Act 2018.

We have not appointed a Data Protection Officer as we do not fall within the categories of controllers and processors required to appoint a Data Protection Officer under Article 37 of the GDPR.

Consent

By using our Site, users agree that they consent to the conditions set out in this Privacy Policy. When the legal basis for us processing your personal data is that you have provided your consent to that processing, you may withdraw your consent at any time. If you withdraw your consent, it will not make processing which we completed before you withdrew your consent unlawful. You can withdraw your consent by contacting us at admin@frescavida.co.uk.

Legal Basis for Processing

We collect and process personal data about users in the EU only when we have a legal basis for doing so under Article 6 of the GDPR. We rely on the following legal bases to collect and process the personal data of users in the EU:

- 1. Users have provided their consent to the processing of their data for one or more specific purposes;
- 2. Processing of user personal data is necessary for us or a third party to pursue a legitimate interest. Our legitimate interest is not overridden by the interests or fundamental rights and freedoms of users;
- 3. Processing of user personal data is necessary for us to take, at the request of a user, steps before entering into a contract or for the performance of a contract to which a user is a party;
- 4. Processing of user personal data is necessary for us to comply with a legal obligation;
- 5. Processing of user personal data is necessary to protect the life of the user or another natural person;
- 6. Processing of user personal data is necessary for a task carried out in the public interest or in the exercise of our official authority.

How We Use Personal Data

Data collected on our Site will only be used for the purposes specified in this Privacy Policy or indicated on the relevant pages of our Site. We will not use your data beyond what we disclose in this Privacy Policy.

Who We Share Personal Data With

We may disclose user data to any member of our organisation and/or independent contractor performing services on behalf of FrascaVida who reasonably needs access to user data to achieve the purposes set out in this Privacy Policy.

We will not sell or share your data with other third parties, except in the following cases:

- 1. If the law requires it;
- 2. If it is required for any legal proceeding;
- 3. To prove or protect our legal rights;
- 4. To buyers or potential buyers of this company in the event that we seek to sell the company.

If you follow hyperlinks from our Site to another Site, please note that we are not responsible for and have no control over their privacy policies and practices.

How Long We Store Personal Data

User data will be stored for 6 years. You will be notified if your data is kept for longer than this period.

How We Protect Your Personal Data

In order to protect your security, we use the strongest available browser encryption and store all of our data on servers in secure facilities. All data is only accessible to our Independent

Contractors strictly on a need-to-know basis for the purposes of performing cleaning services and carrying out regular business activities. Independent Contractors are only provided with the personal data necessary to complete their assigned tasks and do not have access to the full set of personal data collected and managed by FrescaVida Home Solutions Ltd., such as the company's customer relationship management (CRM) system or broader client records. Access to data is limited to ensure the protection of client information and compliance with data protection obligations. Our Independent Contractors are bound by strict confidentiality agreements, and a breach of this agreement would result in the independent contractor's termination.

While we take all reasonable precautions to ensure that user data is secure and that users are protected, there always remains the risk of harm. The Internet as a whole can be insecure at times, and therefore we are unable to guarantee the security of user data beyond what is reasonably practical.

Your Rights as a User

Under the UK General Data Protection Regulation (UK GDPR), you have the following rights concerning your personal data:

1. Right to be Informed

You have the right to be informed about the collection and use of your personal data. This means we must provide you with clear and transparent information about how and why we process your data. This information is typically provided at the time your data is collected and is detailed in this Privacy Policy.

2. Right of Access

You have the right to access your personal data. This is commonly referred to as a Subject Access Request (SAR). Upon request, we must provide you with confirmation as to whether we are processing your personal data, a copy of the data, and other supplementary information. We aim to respond to such requests within one month of receiving them.

3. Right to Rectification

You have the right to have inaccurate personal data rectified or completed if it is incomplete. If you believe that any information, we hold about you is incorrect or incomplete, you can request that we correct or update it.

4. Right to Erasure

You have the right to request the deletion of your personal data in certain circumstances. This includes situations where the data is no longer necessary for the purposes for which it was collected, you withdraw your consent (where consent is the basis for processing), or the data has been unlawfully processed.

5. Right to Restrict Processing

You have the right to request the restriction or suppression of your personal data. This means we can store your data but not use it. This right applies in specific situations, such as when you contest the accuracy of the data or object to its processing.

6. Right to Data Portability

You have the right to obtain and reuse your personal data for your own purposes across different services. This right allows you to move, copy, or transfer personal data easily from one IT environment to another in a safe and secure way, without hindrance to usability. It

applies when the processing is based on consent or a contract and is carried out by automated means.

7. Right to Object

You have the right to object to the processing of your personal data in certain circumstances. This includes processing based on our legitimate interests or where the processing is necessary for the performance of services in the regular course of business.

8. Rights Related to Automated Decision Making and Profiling

You have the right not to be subject to decisions based solely on automated processing, including profiling, which produce legal effects concerning you or similarly significantly affect you. This right ensures that individuals are not subject to decisions based solely on automated processing unless certain conditions are met.

Modifications

This Privacy Policy may be amended from time to time in order to maintain compliance with the law and to reflect any changes to our data collection process. When we amend this Privacy Policy, we will update the "Effective Date" at the top of this Privacy Policy. We recommend that our users periodically review our Privacy Policy to ensure that they are notified of any updates. If necessary, we may notify users by email of changes to this Privacy Policy.

Complaints

If you have any complaints about how we process your personal data, please contact us through the contact methods listed in the Contact Information section so that we can, where possible, resolve the issue. If you feel we have not addressed your concern in a satisfactory manner you may contact a supervisory authority. You also have the right to directly make a complaint to a supervisory authority. You can lodge a complaint with a supervisory authority by contacting the UK Information Commissioner's Office at Information Commissioner's Office