

## 1. Introduction

### 1.1. Purpose of This Privacy Policy

This Privacy Policy (“**Policy**”) explains how WashPane Ltd. (“**WashPane**”, “**we**”, “**us**”, or “**our**”) collects, uses, stores, shares, and protects personal data obtained through the WashPane platform, including its website, application, and associated services (collectively, the “**Platform**”). This Policy is intended to ensure transparency and to comply with applicable data protection laws, including the UK General Data Protection Regulation (“**UK GDPR**”), the Data Protection Act 2018, and other relevant privacy legislation.

### 1.2. Scope of This Policy

This Policy applies to all individuals who access or use the Platform, including but not limited to Customers, Contractors, and visitors (“**Users**”). It governs all data provided directly by Users and any personal data that WashPane collects or generates during the provision of the Platform.

### 1.3. Controller Information

For the purposes of applicable data protection laws, WashPane Ltd., a company incorporated in England and Wales with its registered office at [**128 City Road, London, United Kingdom, EC1V 2NX**], is the data controller responsible for processing your personal data.

### 1.4. User Consent and Acknowledgement

By accessing or using the Platform, Users acknowledge that they have read and understood this Policy. Where required by law, Users will be asked to provide explicit consent to specific types of data processing. Users who do not agree with this Policy should refrain from using the Platform.

## 2. Data We Collect

### 2.1. Personal Data Provided by Users

WashPane collects personal data that Users voluntarily provide when registering for an account, submitting a form, posting or responding to a Job, or otherwise interacting with the Platform. This may include, but is not limited to:

2.1.1. Full name;

2.1.2. Email address;

2.1.3. Phone number;

- 2.1.4. Physical address or service location;
- 2.1.5. Profile information (such as biography, company name, photo);
- 2.1.6. Stripe account identifier or related metadata (for payout purposes, if applicable).

**2.2.** WashPane does **not** collect or store full payment card numbers or bank account details. All such sensitive financial information is handled securely by Stripe in accordance with its own privacy and security practices. For more information, Users should refer to [Stripe's Privacy Policy](#).

### **2.3. Data Automatically Collected**

When Users interact with the Platform, WashPane automatically collects certain technical and usage information, including:

- 2.3.1. IP address and general geographic location;
- 2.3.2. Browser type and version;
- 2.3.3. Device information and operating system;
- 2.3.4. Platform usage data (such as page views, clicks, session duration);
- 2.3.5. Log data and error reports; and
- 2.3.6. Cookies and similar tracking technologies (subject to our Cookie Policy).

### **2.4. Data from Third Parties**

WashPane may collect or receive personal data from third parties, including:

- 2.4.1. Payment processors such as Stripe, for transaction status and identifiers;
- 2.4.2. Identity verification services (where used);
- 2.4.3. Referrals from other users;
- 2.4.4. Publicly available sources or social media accounts (if linked or integrated).

### **2.5. Special Categories of Data**

WashPane does not intentionally collect any special categories of personal data (such as health, biometric, or religious information) through the Platform. Users are asked not to submit such data. If such data is provided inadvertently, it will

be handled in accordance with applicable law but may be deleted where appropriate.

## **2.6. Data Relating to Children**

The Platform is not intended for use by individuals under the age of **18**. WashPane does not knowingly collect personal data from children. If we become aware that personal data of a child has been collected, we will take steps to delete it promptly.

## **3. How We Use Your Data**

### **3.1. Purpose of Processing**

WashPane processes personal data only where it has a lawful basis under applicable data protection laws, including the UK General Data Protection Regulation (UK GDPR). The purposes for which we process personal data include, but are not limited to, the following:

- 3.1.1. To create, manage, and maintain User accounts on the Platform;
- 3.1.2. To enable Users to post, view, respond to, and manage Jobs;
- 3.1.3. To facilitate communication between Customers and Contractors;
- 3.1.4. To process payments and manage financial transactions through our third-party payment processor (Stripe);
- 3.1.5. To provide customer support, resolve disputes, and enforce our Terms and Policies;
- 3.1.6. To personalise Platform content and improve User experience;
- 3.1.7. To send service-related notifications and updates, including operational emails such as job confirmations, status changes, security alerts, and transactional communications such as payment receipts. These communications are essential to the provision of our services and cannot be opted out of;
- 3.1.8. To comply with legal obligations or respond to lawful requests by public authorities;
- 3.1.9. To detect, prevent, and respond to fraud, misuse, security incidents, or other harmful activity;
- 3.1.10. To maintain the integrity, safety, and functionality of the Platform.

### **3.2. Lawful Bases for Processing**

We rely on the following lawful bases under the UK General Data Protection Regulation (UK GDPR) to process personal data:

- 3.2.1. **Contractual necessity:** To perform our contract with you, including facilitating bookings, handling payments and payouts, and providing support through the Platform.
- 3.2.2. **Legitimate interests:** To operate, maintain, and improve the Platform, prevent fraud, monitor usage patterns, and protect the safety and integrity of our services — provided such interests are not overridden by your rights and freedoms.
- 3.2.3. **Compliance with legal obligations:** To meet legal requirements that apply to WashPane Ltd. as a business, such as tax compliance, accounting, fraud prevention, or responding to lawful requests from regulatory authorities.
- 3.2.4. **Consent:** Where required by law, we may rely on your explicit consent to process certain data — for example, for sending optional marketing communications. You may withdraw consent at any time.

### **3.3. Optional Communications**

Users may opt in to receive marketing updates, promotions, and service announcements. Where required by law, WashPane will obtain User consent prior to sending such communications. Users may withdraw consent at any time by adjusting their notification preferences or contacting support.

## **4. Sharing and Disclosure of Information**

We treat your personal information with care and only share it when necessary to provide and support our services, comply with legal obligations, or operate our business effectively. Specifically, we may share your information with:

### **4.1. Service Providers and Partners**

We may disclose personal data to trusted third-party service providers who assist in operating the Platform and delivering our services. This includes payment processors (such as Stripe), cloud hosting providers, analytics services, communication platforms, and customer support tools. These providers are contractually obligated to protect your data and only process it on our instructions.

### **4.2. Other Users of the Platform**

Certain information may be shared between Users when required for the operation of a Job. For example:

- 4.2.1. When a Customer posts a Job, high-level location details (e.g. town or partial postcode) may be visible to eligible Contractors to enable browsing and quoting.
- 4.2.2. Full address details (including street address and postcode) are **not** disclosed to Contractors until the Job has been confirmed through mutual acceptance of a Quote.
- 4.2.3. Contact information and any notes added during the quote submission process may be shared between the Customer and Contractor once a Job is confirmed, solely to facilitate performance of the agreed services.

WashPane does not currently provide an in-app messaging system. All communications outside of the platform are at the discretion and risk of the Users.

#### **4.3. Legal and Regulatory Disclosure**

We may disclose personal data if required to do so by law, regulation, legal process, or governmental request. This may include disclosures for tax, fraud prevention, dispute resolution, or law enforcement purposes. Where possible and legally permitted, we will notify you of such disclosures.

#### **4.4. Business Transfers**

In the event of a merger, acquisition, reorganisation, sale of assets, or insolvency, personal data may be transferred as part of that transaction. In such cases, we will take steps to ensure your rights are protected and that the new entity upholds the commitments of this Privacy Policy.

#### **4.5. With Your Consent**

In situations not otherwise covered by this Policy, we may share your personal data with third parties when you have explicitly given us permission to do so.

### **5. Data Retention**

#### **5.1. Retention Periods**

WashPane retains personal data only for as long as necessary to fulfil the purposes for which it was collected, including for the purposes of providing the Platform, complying with legal, regulatory, tax, accounting, or reporting requirements, and resolving disputes.

#### **5.2. Determining Retention Length**

To determine the appropriate retention period for personal data, we consider:

- 5.2.1. The nature and sensitivity of the data;
- 5.2.2. The potential risk of harm from unauthorised use or disclosure;
- 5.2.3. The purposes for which the data is processed;
- 5.2.4. Whether those purposes can be achieved through other means;
- 5.2.5. Applicable legal obligations.

### **5.3. User-Requested Deletion**

Where a User requests deletion of their Account, WashPane will delete or anonymise the personal data associated with that Account unless retention is required by law or is necessary for legitimate business purposes (e.g. fraud prevention, fee recovery, or record-keeping).

### **5.4. Stripe and Third-Party Data**

Where personal data is shared with third parties such as Stripe, retention of such data is governed by the third party's own policies. WashPane is not responsible for data retained independently by payment processors or other service providers.

### **5.5. Anonymised Data**

In some cases, we may retain anonymised or aggregated data for statistical, research, or business analysis purposes. This data is not considered personal data under applicable law.

## **6. Your Rights**

### **6.1. Overview of Rights**

Subject to applicable data protection laws, Users have the following rights regarding their personal data:

- 6.1.1. **Right of Access** – To request a copy of the personal data we hold about you.
- 6.1.2. **Right to Rectification** – To request correction of inaccurate or incomplete personal data.
- 6.1.3. **Right to Erasure** – To request deletion of your personal data where there is no valid reason for us to continue processing it.
- 6.1.4. **Right to Restriction** – To request that we restrict the processing of your personal data in certain circumstances.

6.1.5. **Right to Data Portability** – To request that we transfer your personal data to another party in a structured, commonly used, and machine-readable format.

6.1.6. **Right to Object** – To object to our processing of your personal data based on legitimate interests or for direct marketing purposes.

6.1.7. **Right to Withdraw Consent** – Where processing is based on your consent, to withdraw that consent at any time. This does not affect the lawfulness of processing carried out before the withdrawal.

## **6.2. Exercising Your Rights**

To exercise any of your rights, you may contact WashPane using the contact details provided in Section 11. We may request verification of your identity before fulfilling your request, and we aim to respond within one month, or as otherwise required by applicable law.

## **6.3. Restrictions and Limitations**

Please note that certain rights may not apply in all cases. For example, we may decline a request for deletion where we are required to retain data for legal compliance or where it is necessary for dispute resolution or fraud prevention.

## **6.4. Complaints**

If you believe your data protection rights have been violated, you have the right to lodge a complaint with the Information Commissioner's Office (ICO) in the UK or with your local data protection authority.

## **7. Data Security**

### **7.1. Safeguards**

WashPane implements appropriate technical and organisational measures to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, or access. These include encryption, access controls, secure storage, and regular system monitoring.

### **7.2. User Responsibility**

Users are responsible for maintaining the confidentiality of their account credentials and for any activity that occurs under their account. We strongly recommend using unique and secure passwords and updating them regularly.

### **7.3. Limitations**

While we take reasonable steps to secure your data, no system is completely secure. We cannot guarantee the absolute security of personal data transmitted via the internet, and any transmission is at your own risk.

### **7.4. Security Incidents**

In the event of a data breach that affects your personal data and presents a significant risk to your rights or freedoms, we will notify you and any applicable authorities in accordance with applicable data protection laws.

## **8. International Data Transfers**

### **8.1. Transfers Outside the UK**

WashPane is based in the United Kingdom, but certain third-party service providers we use (including Stripe and cloud hosting providers) may process or store personal data in countries outside the UK or the European Economic Area (EEA). Where such transfers occur, we ensure that appropriate safeguards are in place to protect your data.

### **8.2. Safeguards**

These safeguards may include:

- 8.2.1. The use of standard contractual clauses approved by the UK Information Commissioner's Office or the European Commission;
- 8.2.2. Transfers to countries that are recognised as providing an adequate level of data protection under UK or EU law;
- 8.2.3. Binding corporate rules, where applicable.

### **8.3. Your Consent**

By using the Platform, you acknowledge and agree that your personal data may be transferred, stored, or processed outside your jurisdiction, subject to the protections described above.

## **9. Cookies and Tracking Technologies**

### **9.1. Use of Cookies**

The Platform uses cookies and similar tracking technologies (such as web beacons and pixels) to:

- 9.1.1. Enable essential site functionality;

- 9.1.2. Analyse site usage and performance;
- 9.1.3. Improve user experience and platform functionality;
- 9.1.4. Deliver targeted advertising and marketing (if applicable).

## **9.2. Types of Cookies Used**

We may use:

- 9.2.1. **Essential Cookies** – Required for the operation of the Platform (e.g., authentication, security);
- 9.2.2. **Analytics Cookies** – To understand how users interact with the Platform and improve services;
- 9.2.3. **Functionality Cookies** – To remember preferences and enhance user experience;
- 9.2.4. **Marketing Cookies** – To deliver relevant ads or promotions, where applicable.

## **9.3. Managing Cookies**

You may manage or disable cookies through your browser settings. Please note that disabling certain cookies may affect the functionality or performance of the Platform.

## **9.4. Third-Party Tools**

We may also allow third-party tools (such as Google Analytics or Stripe) to set cookies or use similar technologies for analytics and performance purposes. These third parties may collect information about your use of the Platform in accordance with their own privacy policies.

## **10. Changes to This Policy**

### **10.1. Right to Update**

WashPane reserves the right to modify or update this Privacy Policy at any time, to reflect changes in our practices, legal obligations, or the functionality of the Platform.

### **10.2. Notice of Material Changes**

Where material changes are made, we will notify Users by reasonable means, which may include:

- 10.2.1. Posting a notice on the Platform;

10.2.2. Sending an email notification to registered Users;

10.2.3. Highlighting the changes at the top of the revised policy.

### **10.3. Continued Use as Acceptance**

Your continued use of the Platform following any changes to this Privacy Policy constitutes your acceptance of the revised policy. If you do not agree to the updated terms, you should cease use of the Platform and request account deletion if applicable.

### **10.4. Email Communications**

We use your email address to send you important service-related messages, including account verification, password resets, job notifications, cancellations, receipts, and confirmations. These operational emails are necessary for the proper functioning of the Platform and are not considered marketing.

**10.5.** If we wish to send you marketing communications (such as promotions or service updates not directly related to your use of the Platform), we will first obtain your explicit consent, and you may withdraw that consent at any time by following the unsubscribe instructions included in such emails.

## **11. Contact Information**

### **11.1. Data Controller**

The data controller responsible for your personal data is:

#### **WashPane Ltd**

Registered in England and Wales

Company Number: [Insert Company Number]

Registered Address: [Insert Business Address]

Email: [Support@washpane.com](mailto:Support@washpane.com)

### **11.2. Data Protection Queries**

If you have questions or concerns regarding this Privacy Policy, your personal data, or your rights under applicable data protection laws, please contact us at **Support@washpane.com**. We will respond in accordance with applicable legal timeframes.

### **11.3. Complaints to the Regulator**

If you believe that your data protection rights have been violated, you may lodge

a complaint with the UK's supervisory authority:

**Information Commissioner's Office (ICO)**

Website: <https://ico.org.uk>

Phone: **0303 123 1113**