

Privacy Policy

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Table of Contents

1. Introduction
 2. Data Collection
 3. Use of Data
 4. Data Protection Measures
 5. User Rights
 6. Data Sharing
 7. Data Retention
 8. Cookies and Tracking Technologies
 9. Compliance with Dutch Law
 10. Contact Information
-

1. Introduction

1.1 About This Policy

This Privacy Policy explains how **ProductResolve** (Dutch Chamber of Commerce Number 94425647), operating the **SpotsBooking platform** at <http://www.spotsbooking.com>, collects, uses, and protects your personal information.

1.2 Age Requirement

SpotsBooking is intended exclusively for users aged 16 and older. By using our platform, you confirm that you are at least 16 years old. If you are under 16, you may not use our services.

This age requirement ensures compliance with the General Data Protection Regulation (GDPR) and Dutch data protection laws, which provide special protections for children under 16.

1.3 Platform Overview

SpotsBooking connects customers with beauty salons, laser clinics, wellness centers, barbershops and physiotherapy providers for last-minute appointments (72 hours or less). Our platform serves:

- **B2B Users:** Service providers (beauty salons, wellness centers, laser clinics, barbershops, spas, physiotherapy clinics)
- **B2C Users:** Individual customers booking services

1.4 Your Privacy Rights

As a user aged 16 or older, you have full control over your personal data under GDPR and Dutch law. This policy explains your rights and how to exercise them in clear, straightforward language.

2. Data Collection

2.1 What Personal Data We Collect

We collect different types of personal data depending on whether you are a service provider or customer:

2.1.1 From Service Providers (B2B Users) - Section 3.A

Business Information:

- Business name and trading details
- Business address and contact information
- Chamber of Commerce registration number
- VAT number (where applicable)
- Business licence and verification documents, if any.
- Other relevant information for the booking

Representative Information:

- Your name as the business owner or authorised representative
- Email address and telephone number
- Identity verification documents (when required for security)

Service Details:

- Services you offer and descriptions
- Pricing information
- Staff availability and schedules
- Booking calendars and available time slots

Financial Information:

- Bank account details for receiving payments
- Payment history and transaction records
- Invoice and billing information

2.1.2 From Customers (B2C Users) - Section 3.B

Personal Information:

- Full name and contact details
- Email address and telephone number
- Date of birth (for age verification only)
- Profile preferences and account settings

Booking Information:

- Your booking history and appointment details
- Service preferences and special requirements
- Cancellation and modification records
- Attendance records

Payment Information:

- Payment method details (processed securely by third parties)
- Transaction history and receipts
- Billing address information

Communication Data:

- Reviews, ratings, and feedback you provide
- Messages with service providers
- Customer service interactions

2.1.3 Technical Data (All Users) - Section 3.B**Device and Usage Information:**

- IP address and device identifiers
- Browser type and version
- Operating system and device information
- Website usage patterns and behaviour

Location Data:

- General location (with your consent)
- Used only to show nearby services

2.2 How We Collect This Data

We collect your personal data through:

- **Registration forms** when you create an account

- **Booking processes** when you make or receive appointments
- **Cookies and tracking technologies** (see Section 8)
- **Direct communication** with our customer service
- **Usage analytics** as you navigate our platform

3. Use of Data

3.1 Legal Basis for Processing

Under GDPR Article 6, we process your data based on these legal grounds:

3.1.1 Contract Performance (Article 6(1)(b)) - Section 4

Purpose	Service Providers	Customers	Data Used
Account creation and management	✓	✓	Contact information, credentials
Facilitating bookings and appointments	✓	✓	Booking data, availability schedules
Processing payments and payouts	✓	✓	Financial information, transaction data
Providing customer support	✓	✓	Communication records, account details

3.1.2 Legitimate Interest (Article 6(1)(f)) - Section 4

Purpose	Service Providers	Customers	Data Used	Why It's Necessary
Platform improvement and analytics	✓	✓	Usage data, technical information	Essential for maintaining service quality and user experience; minimal privacy impact as data is aggregated and anonymised
Fraud prevention and security	✓	✓	All relevant data	Critical for platform security and user safety; proportionate measures
Business communications	✓	✓	Contact information	Legitimate business need for service updates and important notifications; easy opt-out available

3.1.3 Consent (Article 6(1)(a)) - Section 4

Purpose	Service Providers	Customers	Data Used
Marketing communications	✓	✓	Contact information
Location-based services	X	✓	Location data
Non-essential cookies	✓	✓	Tracking data

3.1.4 Legal Obligation (Article 6(1)(c)) - Section 4

Purpose	Service Providers	Customers	Data Used
Tax and accounting compliance	✓	✓	Financial records
Identity verification (AML/KYC)	✓	X	Identity documents

3.2 Specific Uses of Your Data

For Account Management:

- Creating and maintaining your user profile
- Authenticating your identity when you log in
- Personalising your experience on the platform

For Service Delivery:

- Matching customers with available service providers
- Processing booking requests and confirmations
- Facilitating communication between users
- Managing appointment schedules and availability

For Payments:

- Processing payments securely through third-party processors
- Managing refunds and cancellations
- Maintaining transaction records for accounting

For Communication:

- Sending booking confirmations and reminders
- Providing customer support
- Sending important platform updates
- Marketing communications (only with your consent)

For Platform Improvement:

- Analysing usage patterns to improve our services
- Identifying and fixing technical issues
- Developing new features based on user needs

3.3 Automated Decision-Making and Profiling

We use certain automated systems to improve your experience on our platform. These systems help us deliver efficient services but do not make significant decisions about you without human oversight:

- **Matching Algorithm:** Our platform uses location data and availability information to suggest suitable service providers to customers. This system considers proximity, availability windows, and service categories to create efficient matches.
- **Fraud Detection:** We employ automated algorithms to identify potentially fraudulent activities on the platform. These systems flag unusual patterns for human review and help maintain platform security and trust.
- **Personalized Recommendations:** Based on your past bookings and preferences, our system may suggest services or providers that might interest you. These recommendations aim to enhance your experience but do not limit your choices.

Your Rights Regarding Automated Processing:

- Request human review of any automated decision that affects you
- Express your point of view and contest any decision made by automated systems
- Opt out of personalized recommendations by adjusting your account settings We do not currently make decisions based solely on automated processing that produce legal effects or similarly significant effects on you. Should we implement such systems in the future, we will only do so with your explicit consent or where authorized by applicable law, and we will provide clear information about the logic involved and the significance and consequences of such processing for you.

To exercise any of these rights or if you have questions about our automated processing, please contact us using the contact details provided in Section 9 of this policy.

4. Data Protection Measures

4.1 Technical Security Measures - Section 7

We implement robust technical safeguards to protect your personal data:

Encryption:

- All data transmitted between your device and our servers uses TLS 1.3 encryption
- Data stored on our servers is encrypted using AES-256 encryption
- Payment information is encrypted and processed by certified payment processors

Network Security:

- Advanced firewalls protecting our servers
- Intrusion detection systems monitoring for threats
- Regular security scans and vulnerability assessments

System Maintenance:

- Automatic security updates applied promptly
- Regular backups stored securely and encrypted

4.2 Organisational Security Measures - Section 7

Staff Training:

- Comprehensive data protection training for all employees and team members of the Company.
- Regular updates on privacy laws and best practices
- Clear policies on handling personal data

Incident Response:

- 24/7 monitoring for security incidents
- Documented breach response procedures
- Immediate notification protocols for serious breaches

4.3 Data Breach Procedures - Section 7

If a personal data breach occurs, we will:

11. **Assess the breach** within 24 hours of discovery
12. **Notify the Dutch Data Protection Authority** within 72 hours if required by law
13. **Inform affected users** without undue delay if there's high risk to your rights

14. **Document all breaches** and remedial actions taken
15. **Review and improve** our security measures to prevent future incidents

5. User Rights

5.1 Your Rights Under GDPR - Section 9

As a user aged 16 or older, you have comprehensive rights over your personal data:

5.1.1 Right of Access (Article 15)

What it means: You can request confirmation of whether we process your personal data and obtain a copy of that data.

What you'll receive:

- Confirmation of what data we hold about you
- A copy of your personal data in a readable format
- Information about how we use your data
- Details of who we share your data with

How to exercise: Email legal@spotsbooking.com with "Data Access Request" in the subject line. Include proof of identity (copy of ID or passport).

Response time: Within 1 month (may be extended by 2 months for complex requests)

5.1.2 Right to Rectification (Article 16)

What it means: You can request correction of inaccurate or incomplete personal data.

Examples:

- Updating your contact information
- Correcting spelling errors in your name
- Adding missing information to your profile

How to exercise:

- Update information directly in your account settings, or
- Contact legal@spotsbooking.com with details of corrections needed

Response time: Within 1 month

5.1.3 Right to Erasure (Article 17)

What it means: You can request deletion of your personal data in certain circumstances.

When this applies:

- You withdraw consent and there's no other legal basis for processing

- Your data is no longer necessary for the original purpose
- You object to processing and there are no overriding legitimate grounds
- Your data has been unlawfully processed

Limitations: We may retain data where required by law or for legitimate interests (e.g., fraud prevention, legal claims)

How to exercise: Submit a deletion request to legal@spotsbooking.com

5.1.4 Right to Restrict Processing (Article 18)

What it means: You can request that we limit how we use your data in specific circumstances.

When this applies:

- You contest the accuracy of your data
- Processing is unlawful but you don't want erasure
- We no longer need the data but you need it for legal claims
- You've objected to processing pending verification of legitimate grounds

How to exercise: Contact legal@spotsbooking.com with details of your request

5.1.5 Right to Data Portability (Article 20)

What it means: You can receive your personal data in a structured, machine-readable format and transfer it to another service.

What's included:

- Data you provided to us
- Data generated by your use of our services
- Data in commonly used formats (JSON, CSV)

How to exercise:

- Request data export through your account settings, or
- Email legal@spotsbooking.com

5.1.6 Right to Object (Article 21)

What it means: You can object to processing based on legitimate interests or for direct marketing.

Marketing objections:

- Use unsubscribe links in emails
- Update preferences in your account settings

- Contact legal@spotsbooking.com

Other processing objections:

- Email legal@spotsbooking.com with specific objections
- We'll stop processing unless we have compelling legitimate grounds

5.1.7 Right to Withdraw Consent

What it means: Where processing is based on consent, you can withdraw it at any time.

How to exercise:

- Account settings for marketing preferences
- Cookie settings for tracking preferences
- Email legal@spotsbooking.com for other consent-based processing

Important: Withdrawing consent doesn't affect the lawfulness of processing before withdrawal.

5.2 How to Exercise Your Rights

Contact Methods:

- **Email:** legal@spotsbooking.com (preferred method)
- **Phone:** +31 (0) 620218831
- **Post:** ProductResolve
Spaces Rotterdam (Hofplein)
Hofplein 20 Rotterdam
3032 AC Netherlands, Nederland, Netherlands

What to Include:

- Clear description of your request
- Proof of identity (copy of ID or passport)
- Account information to help us locate your data
- Specific details about what you want us to do

Response Times:

- Most requests: Within 1 month
- Complex requests: Up to 3 months (we'll explain any delays)
- Urgent requests: We'll prioritise where possible

5.3 Right to Lodge a Complaint

If you're not satisfied with how we handle your personal data, you can complain to the Dutch Data Protection Authority:

Autoriteit Persoonsgegevens (AP)

- **Website:** autoriteitpersoonsgegevens.nl
- **Phone:** +31 (0)70 888 8500
- **Address:** Bezuidenhoutseweg 30, 2594 AV Den Haag, Netherlands
- **Email:** info@autoriteitpersoonsgegevens.nl

6. Data Sharing

6.1 Sharing Between Platform Users - Section 5

6.1.1 What Service Providers See About Customers

When you book an appointment, service providers can see:

- Your name and contact details
- Appointment date and time
- Service requested
- Any special requirements you've noted
- Your booking and attendance history with that provider only

6.1.2 What Customers See About Service Providers

When browsing services, you can see:

- Business name and location
- Services offered and pricing
- Available appointment slots
- Reviews and ratings from other customers
- Contact information for booking confirmations

6.2 Third-Party Service Providers - Section 5

We share personal data with trusted third-party processors under strict data processing agreements:

6.2.1 Payment Processors

Stripe and PayPal

- **Purpose:** Processing payments and refunds securely
- **Data shared:** Payment information, transaction details
- **Location:** Ireland (EU), United States
- **Safeguards:** PCI DSS compliance, Standard Contractual Clauses
- **Privacy policies:** stripe.com/privacy, paypal.com/privacy

6.2.2 Technology Providers

Cloud Hosting (CloudFlare, Vercel,)

- **Purpose:** Secure data storage and platform operation
- **Data shared:** All platform data (encrypted)
- **Location:** EU regions (Frankfurt, Ireland)
- **Safeguards:** Data Processing Addendum, EU data residency

Email Services (Mailgun)

- **Purpose:** Sending booking confirmations and marketing emails
- **Data shared:** Email addresses, names, preferences
- **Location:** United States
- **Safeguards:** Standard Contractual Clauses

6.2.3 Analytics Providers

Google Analytics

- **Purpose:** Website usage analytics and improvement
- **Data shared:** Anonymised usage data, IP addresses
- **Location:** Ireland (EU), United States
- **Safeguards:** Google Analytics Data Processing Amendment

6.3 Legal Disclosures - Section 5

We may disclose personal data when legally required:

- **Legal obligations:** Court orders, regulatory requests
- **Law enforcement:** Criminal investigations, fraud prevention

- **Rights protection:** Defending our legal rights or those of users
- **Terms enforcement:** Preventing misuse of our platform

Important: We never sell your personal data to third parties.

6.4 International Data Transfers - Section 6

When transferring data outside the European Economic Area (EEA), we ensure appropriate safeguards:

Transfer Mechanisms:

- **Standard Contractual Clauses (SCCs):** For transfers to processors in third countries
- **Adequacy Decisions:** For transfers to countries with adequate protection
- **Binding Corporate Rules:** For multinational service providers

Specific Countries:

- **United States:** Some services use US-based processors with SCCs and appropriate technical measures
- **Other Third Countries:** Any transfers use appropriate safeguards as required by GDPR Article 46

7. Data Retention

7.1 How Long We Keep Your Data - Section 8

We retain personal data only as long as necessary for the purposes outlined in this policy:

7.1.1 Service Providers (B2B Users)

Data Type	Retention Period	Legal Basis
Account information	Duration of business relationship + 7 years	Tax and accounting obligations
Financial records	7 years after last transaction	Legal obligation (Dutch tax law)
Communication records	3 years after last interaction	Legitimate interest (dispute resolution)
Marketing data	Until consent withdrawn	Consent
Service listings	Duration of account + 1 year	Contract performance

7.1.2 Customers (B2C Users)

Data Type	Retention Period	Legal Basis
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Account information	Duration of account + 3 years	Contract performance, legitimate interest
Booking history	3 years after last booking	Legitimate interest (service improvement)
Payment records	7 years after transaction	Legal obligation (financial records)
Reviews and ratings	5 years (anonymised after 2 years)	Platform integrity and service quality
Marketing data	Until consent withdrawn	Consent
Communication records	2 years after last interaction	Legitimate interest (customer service)

7.1.3 Technical Data

Data Type	Retention Period	Purpose
Server logs	12 months	Security monitoring and troubleshooting
Analytics data	26 months	Service improvement and user experience
Cookie data	As specified in cookie policy	Various (see Section 8)
Security incident logs	5 years	Legal compliance and security improvement

7.2 Deletion Procedures - Section 8

Automated Deletion:

- Our systems automatically delete data when retention periods expire
- Regular automated reviews ensure compliance with schedules
- Secure deletion methods prevent data recovery

Manual Review:

- Quarterly audits of data retention compliance
- Annual review of retention periods and legal requirements
- Immediate deletion upon valid erasure requests

Secure Disposal:

- Data permanently deleted using industry-standard methods
- Multiple overwriting passes for sensitive data
- Certified destruction for physical storage media

7.3 Exceptions to Deletion

We may retain data longer when:

- **Legal proceedings:** Data relevant to ongoing legal matters
- **Regulatory requirements:** Extended retention required by law
- **Fraud prevention:** Data necessary for security and fraud detection
- **Anonymised data:** Data that no longer identifies individuals

8. Cookies and Tracking Technologies

8.1 What Are Cookies - Section 10

Cookies are small text files stored on your device when you visit our website. We also use similar technologies like web beacons and pixels to enhance your experience and understand how you use our platform.

8.2 Why We Use Cookies

Essential Functions:

- Keeping you logged in during your session
- Remembering items in your booking cart
- Protecting against security threats
- Ensuring the website works properly

Enhanced Experience:

- Remembering your preferences and settings
- Showing you relevant content
- Improving website performance
- Providing customer support

8.3 Types of Cookies We Use - Section 10

8.3.1 Essential Cookies (No Consent Required)

Cookie Name	Purpose	Duration	Provider
session_id	Maintain your login session	Session only	SpotsBooking
csrf_token	Protect against security attacks	Session only	SpotsBooking

cookie_consent	Remember your cookie preferences	1 year	SpotsBooking
load_balancer	Ensure optimal website performance	Session only	SpotsBooking

8.3.2 Functional Cookies (Consent Required)

Cookie Name	Purpose	Duration	Provider
user_preferences	Remember your account settings	1 year	SpotsBooking
language_pref	Remember your language choice	1 year	SpotsBooking
location_pref	Remember your location preferences	6 months	SpotsBooking

8.3.3 Analytics Cookies (Consent Required)

Cookie Name	Purpose	Duration	Provider
_ga	Track website usage patterns	2 years	Google Analytics
_gid	Track daily website sessions	24 hours	Google Analytics
_gat	Limit data collection rate	1 minute	Google Analytics
ga[ID]	Enhanced analytics tracking	2 years	Google Analytics

8.3.4 Marketing Cookies (Consent Required)

Cookie Name	Purpose	Duration	Provider
_fbp	Facebook advertising pixel	3 months	Facebook
ads_preferences	Remember advertising preferences	1 year	SpotsBooking
marketing_source	Track how you found our website	30 days	SpotsBooking

8.4 Managing Your Cookie Preferences - Section 10

8.4.1 Cookie Banner

When you first visit our website, you'll see a cookie banner with these options:

- **Accept All:** Consent to all cookies
- **Reject Non-Essential:** Only essential cookies will be used
- **Cookie Settings:** Choose specific cookie categories
- **Consent Requirements:** Non-essential cookies (including analytics, advertising, and functionality cookies) are only set after you provide explicit consent. Essential cookies are set automatically as they are necessary for basic website functionality and cannot be disabled

8.4.2 Changing Your Preferences

Through Our Website:

- Click "Cookie Settings" in the website footer
- Visit your account settings and select "Privacy Preferences"
- Use the cookie banner that appears on your first visit

Through Your Browser:

- Chrome: Settings > Privacy and Security > Cookies
- Firefox: Settings > Privacy & Security > Cookies and Site Data
- Safari: Preferences > Privacy > Manage Website Data
- Edge: Settings > Cookies and Site Permissions

Important: Disabling essential cookies may affect website functionality.

8.4.3 Third-Party Cookie Controls

Google Analytics:

- Opt out at: tools.google.com/dlpage/gaoptout
- Use Google's privacy controls in your Google account

Facebook Pixel:

- Manage ad preferences at: facebook.com/ads/preferences
- Opt out of interest-based ads

8.5 Legal Basis for Cookies - Section 10

Our cookie usage complies with:

- **Dutch Telecommunications Act (Telecomwet)**

- **ePrivacy Directive Article 5(3)**
- **General Data Protection Regulation (GDPR)**

Essential cookies: Used based on legitimate interest for website functionality

All other cookies: Require your explicit consent before placement

9. Compliance with Dutch Law

9.1 Applicable Laws and Regulations

This Privacy Policy ensures compliance with:

European Union:

- General Data Protection Regulation (GDPR) 2016/679
- ePrivacy Directive 2002/58/EC

Netherlands:

- Dutch Implementation Act of the GDPR (Uitvoeringswet Algemene Verordening Gegevensbescherming)
- Dutch Telecommunications Act (Telecomwet)
- Dutch Civil Code provisions on privacy

9.2 Data Protection Authority Compliance

We comply with guidelines and decisions from the **Autoriteit Persoonsgegevens (AP)**, including:

- Transparency requirements for privacy notices
- Cookie consent mechanisms
- Data breach notification procedures
- Individual rights implementation
- Cross-border data transfer safeguards

9.3 Specific Dutch Requirements

9.3.1 Age Verification

Under Dutch implementation of GDPR:

- Users must be 16 or older to consent to data processing
- We verify age during account registration
- Special protections apply to users under 18 for marketing

9.3.2 Consent Requirements

Marketing Communications:

- Explicit opt-in required for email marketing
- Clear unsubscribe options in all communications
- Separate consent for different marketing channels

Cookies:

- Explicit consent required for non-essential cookies
- Granular consent options for different cookie types
- Easy withdrawal of consent mechanisms

9.3.3 Data Processing Agreements

All third-party processors have signed agreements ensuring:

- GDPR compliance requirements
- Data security obligations
- Incident notification procedures
- Data subject rights implementation
- Audit and inspection rights

9.4 Legal Disclaimers**Limitation of Liability:**

While we implement appropriate security measures, no system is completely secure. We cannot guarantee absolute security of personal data transmitted over the internet.

Third-Party Services:

We are not responsible for the privacy practices of third-party websites or services linked from our platform. Please review their privacy policies separately.

Legal Changes:

This policy may be updated to reflect changes in applicable laws and regulations. We will notify users of significant changes as required by law.

9.5 Dispute Resolution**Internal Complaints:**

- Contact our privacy team at legal@spotsbooking.com
- We aim to resolve complaints within 30 days
- Escalation procedures available for unresolved issues

External Complaints:

- Dutch Data Protection Authority (Autoriteit Persoonsgegevens)

- European Data Protection Board for cross-border issues
- Dutch courts for legal disputes

10. Contact Information

10.1 Data Protection Enquiries - Section 13

Primary Contact for Privacy Matters:

- **Email:** legal@spotsbooking.com
- **Phone:** +31(0) 620218831
- **Response time:** Within 5 business days for initial response
- **Languages:** Dutch, English

Postal Address:

ProductResolve
Rotterdam, Spaces Rotterdam (Hofplein)
Hofplein 20 Rotterdam
3032 AC Netherlands

10.2 General Customer Support

For Booking and Account Issues:

- **Email:** info@spotsbooking.com
- **Phone:** +31 (0) 620218831
- **Response time:** Within 24 hours

10.3 Data Protection Officer

Current Status: We are assessing whether a Data Protection Officer appointment is required based on our processing activities. If appointed, contact details will be updated in this section.

When Required: Under GDPR Article 37, if our processing activities require regular monitoring of individuals or involve special categories of data at scale.

10.4 Business Information

Company Details:

- **Legal Name:** ProductResolve
- **Registration:** Chamber of Commerce Number 94425647
- **Website:** <http://www.spotsbooking.com>
- **Jurisdiction:** Netherlands

- **Industry:** Online booking platform for last minute spots for beauty and wellness services

10.5 Regulatory Contacts

Dutch Data Protection Authority:

- **Name:** Autoriteit Persoonsgegevens (AP)
- **Website:** autoriteitpersoonsgegevens.nl
- **Phone:** +31 (0)70 888 8500
- **Email:** info@autoriteitpersoonsgegevens.nl
- **Address:** Bezuidenhoutseweg 30, 2594 AV Den Haag, Netherlands

10.6 Emergency Contact

For Urgent Privacy Matters:

- **Email:** legal@spotsbooking.com
- **Phone:** +31 (0) 620218831 (24/7 for security incidents)

What Constitutes Urgent:

- Suspected data breaches
- Unauthorised access to accounts
- Identity theft concerns
- Legal enforcement requests