



Privacy Policy for Bloomy BV

Effective Data: 20 September 2020.

At Bloomy bv (“Bloomy,” “we,” “us,” or “our”), one of our main priorities is the privacy of our users. This Privacy Policy (also “the Policy”) describes how Bloomy collects, stores, and protects your information when you use our website at bloomypro.com (the “Site”), as well as through any other website, mobile applications, pages, features, or content owned and operated by Bloomy that directs to this Privacy Policy (collectively, including the Site and any Apps, the “Services”).

By using our Services, you understand and acknowledge that collection and use of your personal information will be made in accordance with this Privacy Policy and our Terms of Use, available [here](#). If you do not feel comfortable with any part of this Privacy Policy or our Terms of Use, please discontinue use of the Services or engaging with Bloomy immediately.

Topics Addressed in this Policy

1. Updates to this Policy.
2. Data We Collect from You, and How We Collect It.
3. How We Use Your Data.
4. How We Store Your Data.
5. When, Why, and How We Might Need to Share Your Data.
6. Cookies: What They Are, How We Use Them, and Your Choices with Respect to Cookies and Similar Technologies.
7. Data Retention.
8. Communication Preferences.
9. Access, Correction, And Deletion of Your personal information.
10. GDPR rights for Bloomy users in the EEA, the U.K., and Switzerland.
11. CCPA rights for users in California (“Do Not Sell My Data”).
12. Data Security.
13. Integration of Third-Party Platforms and Services.
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1. Updates to this Policy.

We may update this Privacy Policy from time to time as we update or expand our Services. If we make material changes, we will post the updated Privacy Policy on this page with a “Last Updated” effective date of the revisions. We encourage you to look for updates and changes to this Privacy Policy by checking this page when you access our Services. If you have any questions about this Privacy Policy, please reach out to us anytime at info@bloomypro.com.

2. Data We Collect from You, and How We Collect It.

We collect personal information from you when you interact with our Services. Personal information is any information that identifies an individual. The definition of personal information (also called “personal data” or “data” within this Policy) depends on the applicable laws based on your physical location. Only the definition that applies to your physical location will apply to you under this Privacy Policy.

The types of personal information that we may collect about you include, but are not limited to: information you voluntarily provide to us, information collected automatically about your use of our Services, and information from third parties.

a) Information You Voluntarily Provide to Us.

The personal information we collect on or through our Services may include:

- **Account Registration Information:** this includes information required to create an account on our website, such as first and last name, email address, the name of your employer / company, postal address (including country of residence), telephone number, and/or a unique individual password. For student or school-affiliated users with a school license, this may include school login names as well as sub-user information such as fake login names and fake email addresses.
- **Form Submissions:** information that you provide by filling in forms that we make available. This includes information provided when making purchases from our Site or requesting information or assistance;
- **Questionnaire Surveys:** information that registered users may optionally provide, for example information regarding their satisfaction with our products;
- **Technical Support and Customer Service:** information you provide when you report a problem with our Services or otherwise communicate with us by email, our Site, by telephone, in writing or through other means, including records and copies of your correspondence;
- **Promotions and Feedback:** information relating to your participation in a promotion;
- **Payment Information:** payment card, transaction or financial account information, if you make a purchase online or sign up via our order forms;

b) Information Collected Automatically.

As you navigate through and interact with our Site or Apps, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions and patterns, including:

- **Information About Your Use of the Services:** when you browse our Site, our systems automatically collect information such as your web request, Internet Protocol ("IP") address, browser type, browser language, domain names, referring and exit pages and URLs, platform type, pages viewed and the order of these page views, the amount of time spent on particular pages, and the date and time of your request.
- **Device Information:** if you access the Services through a mobile device (e.g., a smart phone or tablet), we may be able to identify the general location of your mobile device, your mobile device's brand, model, operating system, resolution, screen size, system version, mobile network information, and your mobile device's advertising ID.
- **Performance Data:** information about your preferences to make your use of the Services more productive, via the use of Cookies or similar tracking technologies. For more information, please see Section 6, which discusses Cookies.

c) Information from Third Parties.

When you interact with our Services or accounts on a social media platform, we may collect the personal information that you or the platform make available to us on that page or account, including your social media account ID and/or user name associated with that social media service, your profile picture, email address, friends list or information about the people and groups you are connected to and how you interact with them, and any information you have made public in connection with that social media service.

The information we obtain depends on your privacy settings on the applicable social media service; we will comply with the privacy policies of the social media platform and we will only collect and store such personal information that we are permitted to collect by those social media platforms. When you access our Services through social media channels or when you connect our Services to social media services, you are authorizing us to collect, store, and use such information and content in accordance with this Privacy Policy.

3. How We Use Your Data.

- **To Provide Our Services.** We use your data to provide any services or products that you request or purchase in connection with the Services, this includes your initial registration with Bloomy;
- **To Provide You with Service-Related Communications.** We use your data to contact you regarding the administration of any features or functions of the Services you have registered to use, and to notify you about changes to our Services, our policies, terms, or any products or services we offer or provide through our Services;
- **To Provide Customer:** we use your data to provide you with notices about your account and responding to your questions or other requests;
- **To Send You Marketing and Promotional Emails:** we use your data to contact you with marketing or promotional materials and other information that may be of interest to you based on the Services that you already use, and products or services that you have already purchased or inquired about, unless you have opted not to receive such information;
- **For Internal Research and Services Improvement:** we use your data for internal research and development of our products and offerings, as well as accumulating and reporting aggregate, statistical information in connection with the Services user activity, including determining which features and services users like best to help us operate, enhance, and improve our products and Services;
- **To Enforce Compliance with Our Agreements or Policies:** keeping you secure and safe while using our Services is one of our main priorities. This requires us to process your personal information in accordance with this Privacy Policy to combat spam, malware, malicious activities, fraud, or security risks as part of our ongoing maintenance and enforcement of our security measures, and carrying out our obligations and enforcing our rights arising from any contracts entered into between you and us, including for billing and collection;
- **To Maintain Legal and Regulatory Compliance:** we process your personal information to pay our taxes, fulfill our business obligations, for compliance with employment and recruitment laws, or as necessary to manage risk under applicable law;
- **For Customization:** we use your data to allow you to customize your Bloomy account, which includes saving your floral arrangements, registering to use the Service, saving any profile data or other personal information (so you do not have to re-enter it each time you visit our site); tracking your return visits to and use of the services; tailoring your experience on the Services; and/or otherwise customizing what you see when you visit and use the Services;

With Your Consent: we may also use your data for any other purpose disclosed to you prior to you providing us your personal information, or which is reasonably necessary to provide the Services or other related products and/or services requested, with your permission or upon your direction.

4. How We Store Your Data.

Bloomy only retains your personal information for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your personal information to the extent necessary to comply with our legal obligations (for example, if

we are required to retain your data or the information you provided to us to comply with applicable laws), to resolve disputes and enforce our legal agreements and policies.

We will retain your contact information for marketing purposes until you unsubscribe from our marketing communications. We will also retain Services usage data for internal analysis purposes. Usage data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Services, or we are legally obligated to retain this data for longer periods.

5. When, Why, and How We Might Need to Share Your Data.

We may share or disclose your personal information in the following circumstances:

- **Within Our Corporate Organization.** We may share your personal information with any subsidiaries and affiliates to provide you with the Services and take actions based on your request, as well as for the purpose of management and analysis.
- **With Service Providers.** We may employ other companies and individuals to facilitate our Services, provide services on our behalf, perform service-related business activities, or assist us in analyzing how our Services are used. These service providers provide us support services such as credit card processing, payment gateways, subscription processing, website hosting, customer relationship management, email and postal delivery, analytics, surveys, and marketing and advertising services. The service providers have access to your personal information only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.
- **For Corporate Transactions.** We may disclose personal information to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our Services users is among the assets transferred. You agree to and do hereby consent to our assignment or transfer of rights to your personal information.
- **As Required by Law and to Protect Lawful Interests.** We may disclose your information if we believe that the disclosure is required by law, if we believe that the disclosure is necessary to enforce our agreements or policies, in response to valid requests by public authorities (e.g., a court or a government agency), or if we believe that the disclosure will help us protect the rights, property, or safety of Bloomy or our customers.
- **With Your Consent.** We may disclose your personal information for any purpose with your consent.

Please note that we may disclose, without restriction, aggregated or anonymized information about the users of our Services. This information that does not identify any specific individual.

6. Cookies: What They Are, How We Use Them, and Your Choices with Respect to Cookies and Similar Technologies.

Bloomy may use cookies, embedded scripts and other similar technologies (collectively, “Tracking Technologies”) to collect additional personal information automatically as you interact with the Services. These Tracking Technologies allow Bloomy to personalize your experience with our site and Services. We also may use these technologies to collect information about your online activities over time and across third party websites or other online services.

a) Cookies

Cookies are small web files that a site or its provider transfers to your device's hard drive through your web browser that enables the site's or provider's system to recognize your browser and remember certain information. We use first-party and third-party cookies for the following purposes:

- to make our Services function properly;
- to improve our Services;
- to make login to our Services easier (such as by remembering your user ID);
- to recognize you when you return to our Services and to remember information you have already provided;
- to track your interaction with the Services;
- to collect information about your activities over time and across third party websites or other online services to deliver content tailored to your interests;
- and to provide a secure browsing experience during your use of our Services.

We may place cookies from third-party service providers who may use information about your visits to other websites to target advertisements for products and services available from us. We do not control the types of information collected and stored by these third-party cookies. You should check the third-party's website for more information on how they use cookies.

b) Your Choices with Cookies and Tracking Technologies.

Your browser may provide you with the option to refuse some or all browser cookies. You may also be able to remove cookies from your browser. You can exercise your preferences in relation to cookies served on our Site by taking the steps outlined below.

- *First-Party Cookies.* You can use the browser with which you are viewing this Site to enable, disable or delete cookies. To do this, follow the instructions provided by your browser (usually located within the "Help", "Tools" or "Edit" settings). Please note, if you set your browser to disable cookies, you may not be able to access secure areas of the Site. Also, if you disable cookies other parts of the Site may not work properly. You can find more information about how to change your browser cookie settings at <http://www.allaboutcookies.org>.
- *Third-Party Cookies.* Many advertising companies that collect information for interest-based advertising are members of the Digital Advertising Alliance (DAA) or the Network Advertising Initiative (NAI), both of which maintain websites where people can opt out of interest-based advertising from their members. To opt-out of website interest-based advertising provided by each organization's respective participating companies, visit the DAA's opt-out portal available at <http://optout.aboutads.info/>, or visit the NAI's opt-out portal available at <http://optout.networkadvertising.org/?c=1>.

Residents of the European Union may opt-out of online behavioral advertising served by the European Interactive Digital Advertising Alliance's participating member organizations by visiting <https://www.youronlinechoices.eu/>.

To opt-out of data collection for interest-based advertising across mobile applications by participating companies, download the DAA's AppChoices mobile application opt-out offering here: <https://youradchoices.com/appchoices>.

While Bloomypro.com does not use third parties advertisements, we we do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. In addition, most web browsers provide help pages relating to setting cookie preferences. More information may be found for the following browsers here:

- [Google Chrome](#)
- [Internet Explorer](#)
- [Mozilla Firefox](#)
- [Safari \(Desktop\)](#)
- [Safari \(Mobile\)](#)
- [Android Browser](#)
- [Opera](#)
- [Opera Mobile](#)

In addition, you can opt out of targeted advertising at any of the links below:

- Facebook - <https://www.facebook.com/settings/?tab=ads>
- Google - <https://www.google.com/settings/ads/anonymous>
- Bing - <https://advertise.bingads.microsoft.com/en-us/resources/policies/personalized-ads>
- Pinterest - <https://help.pinterest.com/en/articles/personalized-ads-pinterest>
- SteelHouse - <https://steelhouse.com/opt-out/>
- Quantcast - <https://www.quantcast.com/opt-out/>

Lastly, you can opt out of direct mail services by visiting the Direct Marketing Association at: <https://dmachoice.thedma.org/>.

c) Analytics.

We may use third-party service providers to monitor and analyze the use of our Site. Presently, we use Google Analytics. Google Analytics is a web analytics service offered by Google LLC (“Google”) that tracks and reports Site traffic. For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>. Google Analytics Opt-out Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics, available at: <https://tools.google.com/dlpage/gaoptout>.

d) Other Tracking Technologies.

To see how our Site is performing we sometimes use conversion beacons, tags, scripts and pixels, which fire a short line of code to tell us when you have clicked on a particular button or reached a particular page. We also use these tracking technologies to analyze usage patterns of our Services. The use of these technologies allows us to record that a particular device, browser, or application has visited a particular webpage.

e) Do Not Track.

Some Internet browsers, such as Internet Explorer, Firefox, and Safari, include the ability to transmit “Do Not Track” or “DNT” signals. Since uniform standards for “DNT” signals have not been adopted, our Site does not currently process or respond to “DNT” signals.

7. Data Retention.

Bloomy will retain your personal information only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your personal information to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data or the information you provided to us to comply with applicable laws), resolve disputes and enforce our legal agreements and policies.

We will retain your marketing contact information until you unsubscribe from our marketing communications. We will also retain Services usage data for internal

analysis purposes. Usage data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Services, or we are legally obligated to retain this data for longer periods.

8. Communications Preferences.

In order to provide service to you, we may send you communications related to your transactions, security, or the administration of this website. From time to time, we may also send you other messages or updates about Bloomy, our website, and our other products and offerings. If you do not wish to receive non-transaction or security-related communications from us, you may opt-out by clicking the “unsubscribe” link in the communication or by contacting us as specified in the “Contact Us” section below.

Please note that if you opt out of receiving communications from us, we may still send you service communications such as emails about your account.

Please note as well that "opt-out" and "unsubscribe" requests may not take effect immediately and may take a reasonable amount of time to receive, process and apply, during which time your information shall remain subject to the prior privacy settings.

9. Access, Correction, And Deletion of Your personal information.

You have the right to access, correct, and delete your personal information that you shared with us on our Site or Services or through other written or oral means. We are committed to allowing you to ensure that your personal information is kept accurate and up to date. However, it is up to you to update it with any changes. In most cases, you can review and submit changes to your personal information by logging into the Site and visiting your account profile page.

You may also notify us via the information in the “Contact Us” section below to request access to, or to correct any personal information that you have provided to us. We may not accommodate a request to delete or change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

If you no longer wish to have your personal information processed, you may request to delete your account (username and password), subject to certain limitations, by contacting us as described below.

10. GDPR rights for Bloomy users in the EEA, the U.K., and Switzerland.

This section provides general information about how Bloomy collects, stores, uses, transfers and otherwise processes personal data in or from certain countries in the European Economic Area, the United Kingdom, and Switzerland (together, for purposes of this section of the Privacy Policy, the “EEA”), in accordance with the General Data Protection Regulation (“GDPR”) and its local implementations.

a) Lawful Bases of Processing.

Where Bloomy is acting as a data controller that determines the purposes and means of processing your personal data, such as when we collect, use, and share personal data as described above, we must have a lawful processing basis for doing so.

Our lawful bases for processing personal data include:

- to conclude or perform a contract with you, for example:
 - to provide you with the usage options that you select within your account, or allow you to save floral arrangements on your online profile;
- to communicate with you about purchases, your accounts, and other Bloomy services;

- for our legitimate business purposes, including to:
 - respond to your customer service inquiries and requests for information;
 - maintain, improve, and analyze our Services, advertisements, and the products and services we offer;
 - detect, prevent, or investigate security breaches or fraud; and
 - facilitate the functionality of our Services;
- to comply with our legal obligations, for example:
 - to maintain appropriate records for internal administrative purposes and as required by applicable law; and
- on the basis of your consent, for example to send you via email and other electronic means personalized promotions and special offers or informing you about our products, offerings, events, or other promotional purposes.

You can withdraw your consent at any time by contacting us as described in the “Contact Us” section below and stating your desire to withdraw your consent.

Please note that we do not collect any special categories of personal information about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). We also do not collect any information about criminal convictions and offences.

b) Your EEA Data Subject Rights.

Under certain circumstances, by law you have the right to:

- Request access to your personal information (this is commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you.
- Request correction of the personal information that we hold about you.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it.
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party), or where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you.
- Request the transfer of your personal information to another party, when possible.
- Not be subject to automated decision-making producing legal or significant effects on an individual. Note that we do not engage in automated decision-making of this kind.

To exercise any of these rights, please contact us as set forth in the “Contact Us” section below and specify which GDPR privacy right(s) you wish to exercise. We must verify your identity to honor your request, which we will respond to within 30 days of receipt.

c) International Transfers.

When Bloomy transfers your personal information internationally, we do so subject to the appropriate protections required under the applicable law. For transfers to a business not located in the EU, we use Standard Contractual Clauses.

We only transfer your data outside of the EEA when necessary for the performance of our contract with you, or the performance of a contract between us and another party that we entered into for your interest, or for important reasons of public interest.

Under certain circumstances we may transfer personal information to recipients in countries outside the EEA, or after we receive such information we may engage in an

onward transfer of such data. To the extent personal information from the EEA is transferred in this way, we require the recipients to apply the EU rely on Standard Contractual Clauses.

d) Retention.

As described in the “Retention” section above, as a general rule, we keep your data for only as long as it is needed to complete the purpose for which it was collected or as required by law. We may need to keep your data for longer than our specified retention periods to honor your requests, including to continue keeping you opted out of marketing emails, or to comply with legal, regulatory, accounting or other obligations.

e) Complaints.

If you have any issues with our compliance, you have the right to lodge a complaint with an EEA supervisory authority [here](#). We would, however, appreciate the opportunity to first address your concerns and would welcome you directing an inquiry first to us per the “Contact Us” section below.

11. Data Security

We have implemented reasonable measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. For example, we encrypt all passwords. Additionally, any payment transactions will be encrypted using SSL or other encryption technology, or will use our third party payment processors, who will use appropriate security procedures.

The ultimate safety and security of your information, however, also depends on you. Where you have chosen a password for access to certain parts of our Services, you are responsible for keeping this password confidential. You should not share your password with anyone.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we strive to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Services. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Services. If you believe that any of your personal information held by Bloomy has possibly been compromised, please contact us immediately as described in the “Contact Us” section below.

12. CCPA Rights for Users in California (“Do Not Sell My Data”).

Under the CCPA, among other rights, California consumers have the rights to:

- Request that a business that collects a consumer’s personal data disclose the categories and specific pieces of personal data that a business has collected about consumers;
- Request that a business delete any personal data about the consumer that a business has collected;
- Request that a business that sells a consumer’s personal data, not sell the consumer’s personal data.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us at info@bloomypro.com

We do not sell your personal data to third parties.

13. Integration of Third-Party Platforms and Services.

The Services may be linked to, rely on and be integrated with websites, applications, interfaces, services and platforms operated by other companies, including third-party services. For example, payments for our Services may be directed through our payment provider Adyen. We are not responsible for the privacy practices of such websites, applications, interfaces, services and platforms operated by third parties that are linked to, rely on and/or integrated with the Services or for the privacy practices of third party advertising companies. Once you leave our Services via a link, access a third-party service or click on an advertisement, you should check the applicable privacy policies to determine, among other things, how related companies process personal information they may collect about you.

This Privacy Policy applies solely to information collected by Bloomy.

14. Children's Information.

Another part of our priority is adding protection for children while using the Internet. We encourage parents and guardians to observe, participate in, and/or monitor and guide their online activity.

Bloomypro.com does not knowingly collect any personal information from children under the age of 13. If you think that your child provided this kind of information on our website, we strongly encourage you to contact us immediately and we will do our best efforts to promptly remove such information from our records.

15. Contact Us.

If you have additional questions or require more information about our Privacy Policy, do not hesitate to contact us at info@bloomypro.com.