

CHEERS PRIVACY POLICY

In this Privacy Policy (“Policy”), references to “**We**”, “**Us**” or “**Our**” means **Cheers**, whose registered address is **560 S 100 W St, Provo, UT 84601**.

This Privacy Policy shall govern Our use of any Personal Information collected by Us concerning your use of **<https://cheers.reviews>** (“Our Site”). The use of information collected through Our Site shall be limited to the purposes under this Policy.

Cheers understands that your privacy is important to you and that you care about how your personal and non-personal information is used and shared online. We respect and value the privacy of everyone who visits Our Site and will only collect and use information in ways that are useful to you and in a manner consistent with your rights and Our obligations under the law.

Please read this Privacy Policy carefully and ensure that you understand it. If you have any questions regarding this Privacy Policy, the practices of this website or your dealings with this website, you may contact Us at “**info@cheers.reviews**”.

1. Introduction

This Policy applies to Our Processing of your Personal Information when you access and/or use Our Site. This Policy would apply to you as a **visitor, end-user, representative, end-customer**, as applicable.

This Privacy Policy applies only to your use of Our Site and does not extend to any websites that are linked to from Our Site (whether We provide those links or whether they are shared by other users). We have no control over how your data is collected, stored or used by other websites and We advise you to check the privacy policies of any such websites before providing any information to them.

2. Definition and Interpretation

In this Policy the following terms shall have the following meanings:

“Account”	means an account required to access and/or use certain areas and features of Our Site;
“Cookie”	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in section 12, below;
“Our Site”	means this website, https://cheers.reviews
“Personal Information”	means any information relating to an identified or identifiable natural person

“Process”	means any operation or set of operations which is performed on Personal Information or sets of Personal Information, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
“Services”	means the services provided by Cheers including NFC Tags, Reviews, AI Insights, Dashboard, Automatic Review Responses, and all other services provided by our representatives or https://cheers.reviews
“UK and EU Cookie Law”	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended in 2004, 2011 and 2015; and 2017
“We/Us/Our”	means Cheers , whose registered address is 560 S 100 W St, Provo, UT 84601

3. Personal Identification Information We Collect

We may collect personal identification information from Users in a variety of ways, including, but not limited to, when Users visit our site, subscribe to the newsletter, fill out a form, and in connection with other activities, services, features or resources we make available on our Site. Users may be asked for, as appropriate, name, email address, mailing address, phone number. Users may, however, visit our Site anonymously.

We will collect personal identification information from Users only if they voluntarily submit such information to us. Users can always refuse to supply personal identification information, except that it may prevent them from engaging in certain Site related activities.

4. Non-personal Identification Information We Collect

We may collect non-personal identification information about Users whenever they interact with our Site. Non-personal identification information may include the browser name, the type of computer, and technical information about Users' means of connection to our Site, such as the operating system and the Internet service providers utilized and other similar information.

5. How We May Use Collected Information

We will use your Personal Information only as described in this Privacy Policy and shall Process your Personal Information only if We have a legal basis to. We may use your Personal Information in the following ways:

1. To respond to communications from you,
2. To carry out market research,

3. To analyze your use of Our site,
4. To gather feedback to enable Us to continually improve Our site and your user experience,
5. To adapt your preferences to your experience on Our site,

In addition to this, with your permission and/or where permitted by law, We may also use your Personal Information for marketing purposes which may include contacting you by email AND/OR telephone AND/OR text message AND/OR post AND/OR web push notifications with information, news and offers on Our Services.

We will not, however, send you any spam and will take all reasonable steps to ensure that we comply with the applicable law in this regard. **Cheers** may also do lead generation activities by adding a call to action buttons/banner/popups for companies with a profile page on the website.

Furthermore, advertisers whose content appears on Our Site may engage in what is known as “behavioral advertising” i.e. advertising which is tailored to your preferences, based on your activity. Your activity is monitored using Cookies, as detailed below in section 12. You can control and limit your information used in this way by adjusting your web browser’s privacy settings. Please note that We do not control the activities of such advertisers, nor the information they collect and use. Limiting the use of your Personal Information in this way will not remove the advertising, but it will make it less relevant to your interests and activities on Our Site.

6. Data Retention Period

Cheers retains the Personal Information collected where an ongoing legitimate business requires retention of such Personal Information such as for litigation/defense purposes, as necessary to comply with our legal obligations, maintain accurate financial and other records, resolve disputes, and enforce our agreements. In the absence of a need to retain your Personal Information as specified herein, We will either delete or aggregate your Personal Information or, if this is not possible then We will securely store your Personal Information and isolate it from any further Processing until deletion is possible.

7. Data Security

- Your Personal Information is extremely important to us. We use appropriate technical and organizational measures to protect the Personal Information that We collect and Process. The measures We use are designed to provide a level of security appropriate to the risk of Processing your Personal Information. If you have questions about the security of your Personal Information, please contact Us immediately as described in this Policy.
- Notwithstanding the security measures that We take, it is important to remember that the transmission of data via the internet may not be completely secure and that you are advised to take suitable precautions when transmitting to Us data via the internet.

8. Disclosure of Information to Third Parties/Partners

- We may share your Personal Information with other companies in Our group. This includes Our subsidiaries AND/OR Our holding company and its subsidiaries.
- We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymized and will not

include any personally identifying information. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers.

- In certain circumstances, We may be legally required to share certain data held by Us, which may include your Personal Information, for example, where We are involved in legal proceedings or where We are complying with the requirements of legislation, a court order, or a governmental authority. We do not require any further consent from you in order to share your data in such circumstances and will comply as required with any legally binding request that is made of Us.
- As a visitor, end-user, representative, end-customer, using **Cheers'** Services as defined herein, any data you provide in the process may be shared with vendors who may reach out to you in connection with the Services and/or to send you relevant marketing collateral with your permission and/or as permitted under law.
- We may contract with third parties to supply products and services to you on Our behalf. These may include payment processing, delivery of goods, search engine facilities amongst other functions we undertake to cater our Services to you. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law.
- We may also share your Personal Information if we merge with or are acquired by another company. In such a case, your information will likely be one of the assets that is transferred.

9. Children's Privacy

We recognize the importance of children's safety and privacy. We do not request, or knowingly collect, any personally identifiable information from children under the age of 16. If a parent or guardian becomes aware that his or her child has provided Us with Personal Information, he or she should write to Us at the email address set forth in this Policy.

10. International Transfer of Personal Information

Your Personal Information and files including their backups are stored on our servers and the servers of companies we hire to provide services to Us. Your Personal Information may be transferred across national borders because We have servers located in the **United States**, and the companies we hire to help Us run our business may be located in different countries around the world.

- **International Transfer**

The information that we collect from you may be transferred to and stored in a country outside the European Economic Area (EEA). It may also be Processed by staff operating outside the EEA who work for Us or our partners. If you are a resident of the European Economic Area and when your Personal Information is Processed outside EEA, We will ensure that the recipient of your Personal Information offers an adequate level of protection, for instance by entering into standard contractual clauses for the transfer of Personal Information as approved by the European Commission (Article 46 General Data Privacy Regulation, 2016), or We will ask you for your prior consent to such international data transfers.

11. Summary of Your Rights Under GDPR

A. European Privacy Rights

If you are a resident of the European Economic Area, you have the following rights -

- **Right to be informed:** You are entitled to know whether we hold your Personal Information and the purpose your Personal Information is processed for.
- **Right of access:** You are entitled to obtain a copy of your Personal Information, together with an explanation of the categories of Personal Information being Processed, the purposes of such Processing, and the details of third parties to whom the Personal Information may have been disclosed to.
- **Right to rectification:** You are entitled to correct / update your Personal Information available with us.
- **Right to erasure:** You are entitled to get your Personal Information erased from Our customer relationship management (CRM) databases. Please note that we need to retain certain Personal Information about you for legal and internal business reasons, such as fraud prevention. We will retain your Personal Information for as long as necessary to provide you with the websites and apps you are eligible to use and as needed to comply with our legal obligations and enforce our agreements.
- **Right to data portability:** You are entitled to obtain and reuse your Personal Information. You can either obtain the Personal Information from Us or, in turn, provide it to a third party (if you so wish), or ask Us to transfer your Personal Information directly to a third party.
- **Right to object/restrict Processing or both:** You have a right to object / restrict the Processing of your Personal Information in some circumstances, including where the Personal Information is inaccurate (for the period during which we are verifying the Personal Information), the Personal Information is no longer required in light of the purpose of Processing, or in connection with direct marketing (you can prevent / discontinue marketing communications to you by checking certain boxes on the forms we use to collect your Personal Information), or by utilizing opt-out mechanisms in the emails we send you. You shall also have the right not to be subject to a decision based solely on automated Processing, including profiling, which produces legal effects concerning and similarly significantly affecting you.

In the above cases, we will retain minimum Personal Information to note that you opted out from being contacted again. For the exercise of any of the above-mentioned rights, please write to Us at "info@cheers.reviews".

B. California Privacy Rights

If you are a resident of California, this section provides additional details about the personal information we collect about you, and your rights under the California Consumer Privacy Act, or "CCPA."

Subject to certain limitations, the CCPA provides you the right to request:

- That we provide you access to details on the categories or specific pieces of personal information we collect and/or sell (including how we use and disclose this information, to whom we may sell it);
- That we delete any of your personal information;
- To opt out of any “sale” of your personal information that may occur; and
- To not be discriminated against for exercising any of the above rights.

If you would like to request that we exercise your California privacy rights under the CCPA, please send us an email. We will verify your request using information associated with your account, including your email address. Further identification may be required. You may also designate an authorized representative to act on your behalf.

Cheers will not sell your personal information without your prior consent. If you want to opt out of the sale of your personal information, please send us an email.

C. Nevada Privacy Rights

Nevada law requires us to share with certain Nevada residents the option to opt out of the "sale" of "personally identifiable information," as defined by Nevada law. We do not engage in such activity; however, if you are a Nevada resident who has purchased goods or services from us, you may submit a request under Nevada law to opt out of any potential future sales by emailing “info@cheers.reviews”.

12. Web-browser Cookies & Similar Technologies

- Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve Our Services. For more details, please refer to section 5, above and to the section below, We have carefully chosen these Cookies and have taken steps to ensure that your privacy is protected and respected at all times.
- By using Our Site you may also receive certain third party Cookies on your computer or device. Third party Cookies are those placed by websites, Services, and/or parties other than Us. We use third party Cookies on Our Site for multiple reasons. For more details, please refer to section 5, above, and to section below. These Cookies are not integral to the functioning of Our Site.
- All Cookies used by and on Our Site are used in accordance with current English and EU Cookie Law.
- Before any Cookies are placed on your computer or device, you will be shown a prompt e.g. pop-up, message bar etc. requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling Us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended.
- Certain features of Our Site depend on Cookies to function. UK and EU Cookie Law deems these Cookies to be “strictly necessary”. These Cookies are shown below. Your consent will not be sought to place these Cookies. You may still block these Cookies by changing your internet browser’s settings, but please be aware that Our Site may not work as intended if

you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

- The following Third party Cookies may be placed on your computer or device:

A. Cookie List

A cookie is a small piece of data (text file) that a website – when visited by a user – asks your browser to store on your device in order to remember information about you, such as your language preference or login information. Those cookies are set by us and called first-party cookies. We also use third-party cookies – which are cookies from a domain different from the domain of the website you are visiting – for our advertising and marketing efforts. More specifically, we use cookies and other tracking technologies for the following purposes:

B. Strictly Necessary Cookies

These cookies are necessary for the website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you that amount to a request for services, such as setting your privacy preferences, logging in, or filling in forms. You can set your browser to block or alert you about these cookies, but some parts of the site will not then work. These cookies do not store any personally identifiable information.

C. Performance Cookies

These cookies allow us to count visits and traffic sources so we can measure and improve the performance of our site. They help us to know which pages are the most and least popular and see how visitors move around the site. All information these cookies collect is aggregated and therefore anonymous. If you do not allow these cookies we will not know when you have visited our site, and will not be able to monitor its performance.

D. Functional Cookies

These cookies enable the website to provide enhanced functionality and personalization. They may be set by us or by third party providers whose services we have added to our pages. If you do not allow these cookies then some or all of these services may not function properly.

E. Targeting Cookies

These cookies may be set through our site by our advertising partners. They may be used by those companies to build a profile of your interests and show you relevant adverts on other sites. They do not store direct personal information, but are based on uniquely identifying your browser and internet device. If you do not allow these cookies, you will experience less targeted advertising.

- Our Site uses analytics services provided by Google and Facebook Website analytics refers to a set of tools used to collect and analyze usage statistics, enabling Us to better understand how people use Our Site. This, in turn, enables Us to improve Our Site and the services offered through it. You do not have to allow Us to use these Cookies, as detailed below, however whilst Our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable Us to continually improve Our Site, making it a better and more useful experience for you.

- The analytics service(s) used by Our Site use(s) Cookies to gather the required information. Certain of these Cookies may be placed immediately when you first visit Our Site and it may not be possible for Us to obtain your prior consent.
- The analytics service(s) used by Our Site use(s) the following Cookies: Given above
- You can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third party cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.
- You can choose to delete Cookies at any time however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalization settings.
- It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

12. Links

Our Site and Services may contain links to third-party websites. For example, occasionally, we may include or offer third-party products or services on our Site at our discretion. These third-party platforms have separate and independent privacy policies. We, therefore, have no responsibility or liability for the content and activities of those linked sites, including their information practices.

13. Changes To This Policy

We may change this Privacy Policy as we may deem necessary from time to time, or as may be required by law. Your continued use of our Services after any changes or revisions to this Privacy Policy indicates your agreement to the terms of the revised Privacy Policy. We recommend that you check this page regularly to keep up-to-date.

14. Your Acceptance of These Terms

Acceptance of Terms Through the use of this website, you are hereby accepting the terms and conditions stipulated within the aforementioned Privacy Policy Agreement. If you are not in agreement with our terms and conditions, then you should refrain from further use of our sites. In addition, your continued use of our website following the posting of any updates or changes to our terms and conditions shall mean that you are in agreement and acceptance of such changes.

15. Contact Us

If you have any questions about Our Site or this Privacy Policy, please contact Us by email at “info@cheers.reviews”, by post at **560 S 100 W St, Provo, UT 84601**. Please ensure that your query is clear, particularly if it is a request for information about the data we hold about you.

Policy Effective From: **09/10/23**

Policy Last Updated: **10/18/23**