PRIVACY POLICY

Opulence Bliss Ltd | Version 1.0 | Effective from: 1 October 2026

Peace within your walls.

1. Introduction

1.1 Opulence Bliss Ltd ("Opulence Bliss", "we", "our" or "us") respects your privacy and is committed to protecting your personal information.

1.2 This Privacy Policy explains how we collect, use, share, store and protect personal information when you:

- book or use our cleaning services (a **Customer**);
- apply to work with us or carry out bookings as a self-employed cleaner (a **Cleaner**) or handyman (a **Handyman**);
- apply for a job with us or work for us as a member of our team (a **Job applicant** or **Team member**);
- register as a Partner, or are referred to us by a Partner or another customer (a **Partner** or a **Referred person**);
- contract with us on behalf of a business (a **Business customer**);
- contact us, give feedback, make a complaint or otherwise deal with us.

1.3 For the purposes of UK data protection law, including the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and the Privacy and Electronic Communications Regulations 2003 (PECR), as amended by the Data (Use and Access) Act 2025, Opulence Bliss Ltd is the **controller** of the personal information described in this policy.

1.4 This policy should be read with our Customer Terms and Conditions, our Cleaner Terms and Conditions, our Handyman Terms and Conditions, our Partner Programme Terms and Conditions, our Cookie and Similar Technologies Policy, our DBS and Criminal-Offence Data Policy and our Safeguarding, Lone Working and Incident Policy.

1.5 In this policy, a reference to a Cleaner also applies to a Handyman unless we say otherwise. "Professionals" means Cleaners and Handymen.

2. Who we are and how to contact us

Opulence Bliss Ltd
Company registration number: 15894675 (registered in England and Wales)
Registered office: 128 City Road, London, United Kingdom, EC1V 2NX
ICO registration number: ZC264981
Email: hello@opulencebliss.com
Call, SMS or WhatsApp: +44 7484 717935
Website: www.opulencebliss.com

If you have any questions about this policy or how we handle your personal information, please contact us using these details.

3. The systems we use

3.1 We run an online platform, website and mobile app that connect households and businesses with self-employed cleaners and handymen. We also manage our business using the following services:

- Google Workspace, including Gmail, Google Forms, Google Sheets, Google Calendar and Google Drive
- WhatsApp Business
- Stripe, for payments and payouts
- Supabase, for our back end: customer and cleaner accounts, bookings, chat, photos and reminders
- Resend, for sending booking confirmations, reminders and password reset emails
- Google, if you choose "Sign in with Google"
- Google (Gemini), which powers the chat assistant built into our website and app
- Accounting software
- Gift card and voucher providers, for Partner rewards
- A massage provider, Wellness by Anja, for an optional benefit for Professionals
- Identity, right-to-work and criminal record checking providers

3.2 These services help us manage bookings, communicate with customers, cleaners and Partners, keep business records and make payments.

4. Information we collect

The information we collect depends on how you deal with us. We aim to collect only what is reasonably necessary.

4.1 Customers

- Name, telephone number and email address
- Property address, postcode and type of property, number of bedrooms and bathrooms
- Cleaning requirements, preferred dates and times, and your instructions
- Access arrangements, such as key-safe codes and entry instructions
- Information about pets or anything that affects safety at your home
- For handyman jobs, a description of the job and any photos or videos you send us, the Quote, and the Materials you choose to buy or pay for
- Limited notes about your needs where they affect safety or how we serve you, for example "needs extra time at the door" (see section 4.7)
- Whether you want cleaning products (the Products Add-on)
- Booking history, cancellations, refunds, tips, loyalty rewards, referral rewards and Booking Credit
- Payment information (processed by Stripe)
- Reviews, feedback, complaints, damage reports and photos you send us, and messages you send through the app, including chat
- Our communications with you, including messages you send through the chat assistant

4.2 Cleaners and Handymen

- Name, date of birth, contact details and address
- Identity documents and right-to-work information
- The outcome of a basic Disclosure and Barring Service (DBS) check
- Self-employment and tax information, including your Unique Taxpayer Reference where you give it to us

- Proof of your public liability insurance
- For Handymen, your trade, qualifications and registrations, including your Gas Safe registration number and ID card details or your competent person scheme registration, where they apply
- Your emergency contact: their name, relationship to you and telephone number. You must tell them that you have given us their details
- When you check in, the time, and the distance between your phone's location and the booking address, so that we can confirm you are at the property (within 500 metres). We keep the time, the distance and the result of the check, not your exact coordinates. If you report a problem getting in, we record the same information. When you check out, we record only the time. We do not track your location at any other time. We also keep any message you send us about running late or being unable to check in
- References, experience, qualifications, availability and the areas you work in
- Bank account and payout information (processed by Stripe)
- Your bookings, hours, pay, tips, ratings and referral rewards
- Information about complaints, incidents or service quality
- Your choices about optional benefits, such as the massage benefit, and any amount taken from your referral rewards balance for it

4.3 Partners

- Name, email address and telephone number, and the details you give on the Partner sign-up form, including your consent
- The description you choose for yourself, for example cleaner, freelancer or stay-at-home parent
- Your personal referral link or code and your referral activity
- Your reward balance and the Gift Cards we send you
- Identity and email verification information

4.4 Referred people

If a Partner or a customer gives us your details, or you contact us through a referral link or code, we receive your name and contact details and the fact that you were referred. We use this to contact you only if you asked us to, and to credit the referral. Partners must have your permission before they pass on your details.

4.5 Business customers

The business name, the name, job title and contact details of the people we deal with, the property address, contract and invoice information, and payment details.

4.6 Information from other sources

We may receive information from Stripe, identity and criminal record checking providers, insurers, referees, official online registers (such as the Gas Safe Register) and the Partner or customer who referred you.

4.7 Safeguarding, incident and safety records

If a concern, accident, threat, theft allegation or other incident arises on a booking, we keep a record. It may include the names and contact details of the people involved, what happened, what was said, messages or photos relating to the incident, any notes about a person's needs that affected safety, and what we did next. It can include information about a child or a vulnerable adult, and sometimes health information, but only what we need to keep people safe. The records are described in our Safeguarding, Lone Working and Incident Policy.

4.8 Job applicants and our team

If you apply for a job with us or work for us as a member of our team, we collect your name, contact details, application and CV, references, right-to-work and identity information, and, once you start, your employment and payment records. We give you a separate notice that explains this in full. Team members may see the information of Customers, Professionals and Partners, but only what they need to do their work.

5. How we use your information and our lawful bases

We must have a lawful basis under UK data protection law to use your personal information. Depending on the circumstances, we rely on the following.

5.1 Contract

Where it is necessary to arrange or carry out a contract with you, or to take steps at your request before a contract. For example, to confirm and manage a booking, take payment, pay a Cleaner, send you a Gift Card, give you Booking Credit or provide customer support.

5.2 Legitimate interests

Where it is reasonably necessary for our legitimate interests and these are not overridden by your rights. For example, to run and improve our services, match Customers with suitable Cleaners, keep records, investigate complaints and incidents, prevent fraud and misuse of referrals and rewards, protect Customers and Professionals (including through check-ins and emergency contacts), deal with safeguarding concerns and incidents, and recover amounts owed. You can object to this use. See section 17.

5.3 Legal obligation

Where we must do something by law. For example, keeping accounting and tax records, carrying out right-to-work checks, and sharing information with HMRC or other authorities.

5.4 Consent

Where the law requires it, we ask for your consent. For example, to send you marketing messages where PECR requires consent, or to share your details with the massage provider for the optional massage benefit. You can withdraw your consent at any time.

5.5 Criminal offence information

The outcome of a basic DBS check is criminal offence information. We use it only to protect Customers and the public, and to prevent unlawful acts, and only where UK data protection law allows. Professionals apply for and pay for their own check and show us the certificate. Only the owner and our authorised onboarding team may see it. We keep a record of the outcome and the date, and we do not keep a copy of the certificate for longer than 6 months. See our DBS and Criminal-Offence Data Policy.

5.6 Special category information

We do not ask for health information or other special category information. Please do not send us this unless it is necessary, for example if you tell us about an allergy that affects the cleaning products we use. If you or someone else gives it to us, we use it only to provide the service safely and, where relevant, to deal with a safeguarding concern or incident (see section 5.7).

5.7 Safeguarding and incident records

We use these records under our legal duties and our legitimate interests in keeping people safe. Where they include special category information or criminal offence information, we rely on the conditions in Schedule 1 of the Data Protection Act 2018 for safeguarding children and individuals at

risk, and for preventing or detecting unlawful acts. We share them only where this is necessary to keep someone safe, or where the law requires or allows it.

6. Who we share your information with

6.1 Cleaners and Handymen. When a booking or job is accepted, we give the assigned Professional the information they need to do the job safely, such as your name, address, booking date and time, cleaning or job requirements, any job photos and access instructions.

6.2 Customers. We give Customers their Cleaner's or Handyman's first name, photograph and rating, so that they know who is coming. For handyman jobs, they also see the Quote.

6.3 Stripe. We use Stripe to take payments and pay Cleaners. Stripe may act as an independent controller for some purposes, such as verifying identity and preventing fraud, and its own privacy policy applies to that. We do not ask you for your online banking passwords or PINs, and you should never send them to us.

6.4 Gift Card providers. To send a Partner their Gift Card, we share their first name, email address and the Gift Card value with the gift card provider, who may be a reseller of cards from retailers such as Amazon, Tesco, Asda and Marks & Spencer. We delete Gift Card codes once they have been sent. The retailers are not connected with us, and their own gift card terms apply.

6.5 Identity, right-to-work and DBS check providers. To check Cleaners and Handymen. We check Gas Safe and other registrations on the official online registers.

6.6 Emergency contacts. If a Professional does not check in and we cannot reach them, we may contact their emergency contact, and, in a real emergency, the emergency services.

6.7 Insurers and brokers. If a claim or incident involves you.

6.8 The massage provider. If you are a Cleaner or Handyman and choose the optional massage benefit, we share your name, contact details, member reference and booking date with Wellness by Anja, an independent provider and a separate controller, with your consent. We pay the provider for each treatment from your referral rewards balance, with your agreement, and we keep a record of this. We do not collect or share health information about you. The provider is responsible for any information you give it directly, such as its intake form, and has its own privacy policy.

6.9 Our advisers and service providers. Accountants, solicitors, other professional advisers, and technical and IT service providers, including Google, WhatsApp, Supabase and Resend. They act on our instructions or under their own legal obligations.

6.10 Authorities. HMRC, the police, regulators and courts where the law requires, or where it is necessary to prevent or detect crime. UK rules on reporting by digital platforms may also require us to share information about Cleaners and their earnings with HMRC.

6.11 Our team. Members of our team, including those who handle emails and carry out onboarding checks, see the information they need for their role. They work under written confidentiality and data protection terms, use only equipment and accounts we provide, and only the owner and authorised onboarding team may see DBS information.

6.12 Business transfers. If we sell or reorganise our business, we may share information with the people involved, who must keep it protected.

6.13 We **do not sell** your personal information.

6.14 Our main providers and their roles. A controller decides why and how personal information is used. A processor uses it only on our instructions. The role depends on the service, as shown below. Each provider's own terms and privacy notice also apply.

Provider	What it does for us	Role
Supabase	Back end: customer and cleaner accounts, bookings, chat, photos and reminders	Processor. It uses the information only on our instructions
Resend	Sends booking confirmations, reminders and password reset emails	Processor. It uses the information only on our instructions
Stripe	Payments and payouts	Processor when it takes and processes payments on our instructions. Independent controller for its own purposes, such as verifying identity, preventing fraud and meeting its legal and regulatory duties, under its own privacy policy
Google Gemini (chat assistant)	Chat messages and, for booking questions, relevant booking details and postcode	Processor. It uses the information to answer the question on our instructions. It may keep it for a short time to detect abuse
Google Workspace	Email, forms, spreadsheets, calendar and documents	Processor for the information we store and process in Google Workspace. Controller for the limited purposes set out in its own terms
Sign in with Google	An optional way to sign in	Independent controller of your Google account information. We receive only what you allow Google to share
WhatsApp	Messages about bookings and support	Independent controller of its own technical and account information. We are the controller of the content of messages we send and receive
Gift Card providers	Supply gift cards for Partner rewards	Set out in our written agreement with the provider

7. Google Workspace and WhatsApp

7.1 We use Google Workspace to collect, store and organise information, including booking forms, spreadsheets, calendars and email. Access is restricted to authorised people who need it. Google's own terms and data processing arrangements apply to its processing.

7.2 We may use WhatsApp Business to talk to Customers, Cleaners and Partners about bookings, confirmations, changes, cancellations and support. Messages can include names, addresses and appointment details. WhatsApp is run by a third party and its own privacy terms apply. Please avoid sending sensitive information through WhatsApp unless necessary. Never send us identity documents, DBS certificates or health information by WhatsApp or personal email. Use the secure method we give you.

7.3 Our website and app include a chat assistant. It does not use cookies. The assistant uses Google's Gemini service, so Google processes the messages you send to it, on our behalf. We do not store the chat history on our website. When you ask about a booking, the relevant booking details and postcode may be shared with the assistant so that it can answer you. Google may process this information outside the UK, including in the United States, and may keep it for a short time to detect abuse. We use a paid service, and Google does not use your messages to train its models. Messages you send to the assistant are personal information,

so please do not put sensitive information, such as health details or bank details, into the chat.

7.4 Calendars and spreadsheets should contain only what we reasonably need to manage the booking.

8. Partner and referral information

8.1 We use your referral link or code to record referrals and decide who is owed a reward.

8.2 If you are a Partner, you must not give us another person's details unless they have agreed that you can. If you promote us, you must follow the law on marketing messages. If a Partner contacts you in breach of these rules, please let us know.

8.3 We check referrals to prevent fraud, such as people referring themselves or creating fake accounts.

9. Marketing

9.1 We send you service messages about bookings, payments and your account because they are part of providing the service.

9.2 We send you marketing by email or text only if you have agreed, or, where PECR allows, where you are an existing customer and we are offering similar services and you were given a clear chance to opt out. You can opt out at any time by using the unsubscribe link or emailing hello@opulencebliss.com.

9.3 We may send marketing to businesses at their corporate email addresses where PECR allows, and we will always include an easy way to opt out.

10. Website, cookies and similar technologies

10.1 Our website and platform use essential cookies and similar technologies that are needed to run the service, such as keeping you signed in and keeping your booking secure. We do not need your consent for these.

10.2 We use analytics, advertising or other non-essential cookies only where you have given your consent, unless the law allows an exemption. We will give you a clear choice and a way to change it at any time.

10.3 Our Cookie and Similar Technologies Policy lists every cookie and similar technology we use, why we use it and how long it lasts. At the date of this policy we use only strictly necessary cookies and similar technologies, and we do not use analytics or advertising tools.

11. Automated decisions

We do not make decisions that have legal or similarly significant effects on you based solely on automated processing. We may use automated checks to spot possible fraud or misuse of rewards, and a person reviews the result before we take action.

12. International transfers

12.1 We use third-party service providers to support our business operations, including payment processing, communications, email, data storage and business administration. Our main providers are Google, WhatsApp, Stripe, Supabase and Resend. Depending on the services used, these providers may process personal information outside the United Kingdom,

including in the United States or other countries. Resend sends our emails from the European Economic Area (Ireland), which is covered by UK adequacy regulations.

12.2 Where UK data protection law requires, we make sure that transfers of personal information to separate organisations outside the UK are covered by UK adequacy regulations, appropriate safeguards or a valid legal exception. Appropriate safeguards may include the UK International Data Transfer Agreement (IDTA) or the UK International Data Transfer Addendum to the EU Standard Contractual Clauses, together with any required assessment of the risks of the transfer.

12.3 Where we rely on the UK-US Data Bridge, we check that the receiving US organisation has an active certification and that the transfer falls within its scope.

12.4 Some members of our team may work from outside the UK, including in Nigeria, and may need remote access to personal information to do their jobs. We restrict access according to job responsibilities and business need, and use appropriate technical and organisational security measures. Team members use only the equipment and accounts we provide. We limit access to sensitive records, including criminal record information obtained for Disclosure and Barring Service (DBS) purposes, to specifically authorised personnel who need it for their role.

12.5 We review our international data access and transfer arrangements as necessary to make sure personal information continues to receive appropriate protection under UK data protection law.

13. How long we keep your information

We keep personal information only as long as we need it for the reasons we collected it, and for the periods below.

- **Customer booking and payment records:** 6 years after the end of the financial year to which they relate, for accounting and tax.
- **Customer account information:** until you close your account, then up to 12 months, unless we need it for a complaint, claim or legal reason.
- **Cleaner and Partner records:** while you work with us and for 6 years afterwards for accounting, tax, claims and reward records.
- **Identity and right-to-work documents:** while you work with us and for 2 years afterwards.
- **Handyman qualifications, registrations and insurance documents:** while you work with us and for 2 years afterwards.
- **Emergency contact details:** while you work with us and for 6 months afterwards.
- **Check-in and check-out records:** 2 years from the booking, or longer if linked to a complaint, incident or claim.
- **Photos and videos of jobs:** 12 months from the job, or longer if linked to a complaint or claim.
- **Safeguarding and incident records:** 6 years from the date they are closed, or longer where the law, a court or an authority requires. Records about a child are kept for longer where official guidance says they should be.
- **Massage benefit records:** 6 years, with our payment records.
- **Unsuccessful job applicants:** 6 months from our decision.
- **DBS check:** we keep the outcome and the date of the check while you work with us and for 6 months after your account closes, and we do not keep a copy of the certificate for longer than 6 months. See our DBS and criminal-offence data policy.
- **Records involved in an unresolved dispute or incident:** until it is resolved, even where the period above has ended.
- **Complaints and damage claims:** 6 years from the date they are closed.

- **Booking messages (email, WhatsApp, text):** 2 years from the last message, or longer if linked to a complaint or claim.
- **Marketing:** until you unsubscribe or withdraw consent, and then we keep a short record so that we do not contact you again.
- **Referral and reward records:** 6 years, to deal with disputes and accounting.

When we no longer need information, we securely delete or anonymise it, unless the law requires us to keep it.

14. Security

14.1 We take reasonable technical and organisational measures to protect personal information against unauthorised access, accidental loss, disclosure, destruction, misuse and alteration. Examples include password protection, restricted access to booking information, secure Google Workspace accounts, appropriate device security and keeping business information within authorised systems.

14.2 Keys, key-safe codes and entry instructions are treated as confidential. Cleaners and Handymen must keep Customer information secure and must not sell it, share it unnecessarily, publish it online or use it for unrelated marketing.

14.3 No electronic system can be guaranteed to be completely secure.

15. Personal data breaches

If we become aware of a personal data breach, we will assess it and act in line with data protection law. Where the law requires, we will tell the Information Commissioner's Office within 72 hours of becoming aware of it, and we will tell the people affected without undue delay if there is a high risk to them.

16. Children

Our services are for adults. We do not knowingly collect personal information from anyone under 18. If you think we have, please contact us. If a safeguarding concern involves a child, we may need to record limited information about the child (see section 4.7).

17. Your rights

Under UK data protection law, you have the right to:

- **be told** how we use your information (this policy);
- **access** a copy of your personal information;
- have inaccurate information **corrected**;
- have your information **deleted** in some circumstances;
- **restrict** how we use it in some circumstances;
- **object** to our use of it, including for direct marketing, which we will always stop;
- **receive** certain information in a portable format;
- **withdraw consent** at any time, where we rely on it; and
- not be subject to decisions based solely on automated processing that significantly affect you.

These rights are subject to conditions and exemptions in the law.

18. How to use your rights

18.1 To use a right, email hello@opulencebliss.com or contact us using the details in section 2. We may need to verify your identity, and we may ask you to clarify your request so that we can find your information.

18.2 We will respond within one month. If your request is complex, we may extend this by up to two further months, and we will tell you why. We do not normally charge a fee.

19. Complaints

19.1 If you have a concern about how we handle your personal information, please contact us first at hello@opulencebliss.com. We will acknowledge your complaint within 3 working days, investigate it and reply without undue delay, and within 30 days in any case.

19.2 You can also complain to the Information Commissioner's Office (ICO), the UK's data protection regulator, at ico.org.uk or on 0303 123 1113. You do not have to contact us first.

20. Changes to this policy

We may update this policy when our business, systems, services or the law change, for example if we add new software, a new payment method or new features. We will show the latest version and the date it was last updated. If a change significantly affects how we use your information, we will tell you directly.

21. Our privacy commitment

Customers trust us with information about their homes, bookings and personal circumstances. Our Cleaners and Partners trust us with their personal and business information. We handle it with the same care, fairness and respect that we expect everyone on our platform to show one another.

Happy Cleaners. Happier Homes.
Your information. Your trust. Our responsibility.