# Irisphera Shopify Plugin – Privacy Policy for Brands (Shop Owners)

Last updated: July 2025

#### 1. Introduction

Welcome to Irisphera, operated by IRISPHERA S.R.L. ("Irisphera", "we", "us", or "our"). This Privacy Policy explains how we collect, use, and protect data when you, as a Shopify store owner ("Brand", "you", or "your"), install and use the Irisphera Plugin on your online store. By installing and using the plugin, you agree to the practices described here.

### 2. Data Controller

IRISPHERA S.R.L. is the data controller for your personal data collected through this service. For any data protection questions, you can contact us at **office@irisphera.com**.

#### 3. Information We Collect from Brands and Your Customers

When you install and activate the Irisphera Plugin on your Shopify store, we may collect the following data:

- **Brand Data:** Your Shopify store details (store name, URL, contact info), plugin configuration, and usage data.
- **Customer Data via Plugin:** Body measurements (height, chest, skin tone, silhouette preferences, style choices) submitted by your customers through the plugin.
- **Session Data:** Anonymous session identifiers, device, and browser information to maintain sessions and improve functionality.
- **Aggregate and Anonymized Data:** Non-identifiable data about customer interactions, product catalog, SKU info, and usage trends used for AI improvements and reporting.

We do NOT collect sensitive personal data such as passwords, payment details, names, email addresses, or any directly personally identifiable information through the plugin.

#### 4. How We Use Your Data

We use the collected data to:

- Enable and maintain the plugin's functionality on your Shopify store.
- Generate personalized 3D avatars and clothing recommendations for your customers.
- Provide insights and reports on customer engagement, sizing trends, and product preferences.

- Improve and optimize the plugin performance and AI algorithms in an anonymized way.
- Communicate important updates, support information, and service improvements to you.
- Comply with legal obligations and protect against misuse or fraud.

#### 5. Our Role as Data Processor

When installed by Shopify store owners, Irisphera acts as a **data processor** processing customer data on behalf of you, the Brand (the data controller). We process this data strictly according to your instructions and only to provide the agreed services. We do not use customer data for any other purposes.

## 6. Data Sharing and Confidentiality

We do **not** sell, rent, or share your store or customer data with third parties for marketing or commercial purposes. We may share anonymized, aggregated data internally or with partners solely for development, analytics, and service improvement. All third parties are bound by contracts ensuring GDPR compliance and data confidentiality.

#### 7. Data Transfers to Third Parties

To operate and improve the plugin, we may transfer data to trusted third-party providers such as:

- Cloud hosting and storage services
- AI and analytics providers

We ensure that all such transfers comply with GDPR and that appropriate safeguards (e.g., Standard Contractual Clauses) are in place when data is transferred outside the EU.

#### 8. Data Retention

- We retain session data and measurements only as long as necessary to provide the service and improve the plugin.
- Aggregate and anonymized data used for AI training may be retained longer but cannot identify individuals.
- We do not store any personally identifiable information through the plugin.

## 9. Data Security

We implement appropriate technical and organizational security measures, including encryption and access controls, to protect your data and your customers' anonymized data against unauthorized access, loss, or misuse.

## 10. Marketing and Communications

We may contact Shopify merchants with updates, service information, or marketing communications only with consent. You may unsubscribe at any time.

## 11. Profiling and Automated Decision-Making

Our AI-based recommendations involve automated processing of the data you or your customers provide to personalize clothing suggestions. This does not produce legal or similarly significant effects on individuals.

#### 12. Data Breaches

In the event of a data breach affecting personal data, we will notify affected parties and relevant authorities in accordance with GDPR requirements.

#### 13. International Data Transfers

Data may be processed in the EU or transferred to countries with adequate data protection or appropriate safeguards in place.

## 14. Children's Privacy

Our plugin is not intended for individuals under the age of 18, and we do not knowingly collect personal data from minors.

## 15. Your Rights and Choices

Depending on your jurisdiction, you have rights including:

- Access to, correction, or deletion of your personal data.
- Restriction or objection to data processing.
- Data portability.
- Withdrawal of consent.

To exercise your rights or request information about the data we hold related to your store or customers, please contact us at **office@irisphera.com**.

# 16. Data Subject Rights via Shopify Merchants

As a Shopify merchant, you are responsible for informing your customers and managing their data subject rights requests under applicable laws. We will cooperate with you and forward any requests received directly to us.

## 17. Brand Responsibilities

You are responsible for:

- Informing your customers about how their data will be used through your own Privacy Policy or notices.
- Obtaining necessary consents under applicable laws (e.g., GDPR).
- Ensuring the proper and lawful use of the plugin within your store environment.

## 18. Changes to This Privacy Policy

We may update this Privacy Policy occasionally. Updates will be posted on our website and communicated as necessary.

## 19. Contact Us

For questions or concerns about this Privacy Policy or your data, please contact: IRISPHERA S.R.L.

Email: office@irisphera.com