

# Full Privacy Policy

## **RADARME LLC Privacy Policy**

This Privacy Policy was last modified on August, 2022.

### **WELCOME**

RADARME, LLC ("**RADARME**", "**we**", "**our**", or "**us**") is committed to protecting and respecting your privacy.

RADARME operates a service that allows you to speak to and share your location with other users in your family or friendship group (each group, a "**Circle**"), which we make available through our apps and our website <https://www.radarsmart.eu> (the "**Service**").

This Privacy Policy explains our practices regarding the collection, use, disclosure, transfer, storage, and protection of personal information that is collected through our Service, as well as your choices regarding the collection and use of information.

Our Service is available in many countries, which may have different standards and requirements in respect of the information we provide in the Privacy Policy and how we use personal information.

This Privacy Policy sets out information applicable to users in the European Economic Area, Switzerland or the UK.

Before accessing or using our Service, please ensure that you have read and understood how we collect, store, use and disclose your personal information as described in the part of this Privacy Policy that is relevant to you.

### **Privacy Policy for EEA and Swiss users**

This Privacy Policy sets out how we collect, store, process, transfer, share and use data that identifies or is associated with you ("**personal information**") when you access our Service from the European Economic Area, Switzerland or the UK.

This Privacy Policy was last modified on August, 2022.

RADARME, LLC is the data controller of the personal information we hold about you.

## 1. PERSONAL INFORMATION WE COLLECT ABOUT YOU

1.1 We collect personal information that you voluntarily submit directly to us when you use our Service. This can include information you provide to us when you register for an account and user profile, create or edit your user profile on the Service, update your preferences, check-in at a particular location, correspond with us by phone, SMS, e-mail or otherwise, or use some other feature of our Service.

1.2 We will indicate to you where the provision of certain personal information is required in order for us to provide you certain features of the Service. If you choose not to provide such personal information, we may not be able to provide the Service to you or respond to your other requests.

1.3 The table at **Annex 1** sets out the categories of personal information we collect about you and how we use that information, as well as the legal basis which we rely on to process the personal information.

1.4 We also automatically collect personal information indirectly about how you access and use the Service and information about the device you use to access the Service.

1.5 The table at **Annex 2** sets out the categories of personal information we collect about you automatically and how we use that information. The table also lists the legal basis which we rely on to process the personal information.

1.6 We may link or combine the personal information we collect about you and the information we collect automatically. This allows us to provide you with a personalised experience regardless of how you interact with us.

1.7 We may de-identify any of the personal information we collect (so that it does not directly identify you) and use it for purposes that include testing our IT systems, research, data analysis, improving our Service and developing new products and features.

1.8 We will store the personal information we collect about you for no longer than necessary for the purposes set out in **Annex 1** and **Annex 2** and in accordance with our legal obligations and legitimate business interests.

## 2. RECIPIENTS OF PERSONAL INFORMATION

We may share your personal information with the following:

(a) **Others in your RadarSmart Circle:** we may share your personal information, including your name, location, with other users of our Service at your request and in accordance with your settings and preferences.

(b) **Service providers, business partners and advisors:** we may share your personal information with third party vendors and other service providers that perform services for us or on our behalf, which may include providing payment, email or chat services, fraud prevention, bot detection, web hosting, or providing analytic services.

(c) **Purchasers and third parties in connection with a business transaction:** your personal information may be disclosed to third parties in connection with a transaction, such as a merger, sale of assets or shares, reorganisation, financing, change of control or acquisition of all or a portion of our business.

(d) **Law enforcement, regulators and other parties for legal reasons:** we may share your personal information with third parties as required by law or if we reasonably believe that such action is necessary to (i) comply with the law and the reasonable requests of law enforcement; (ii) detect and investigate illegal activities and breaches of agreements, including our Terms of Service; and/or (iii) exercise or protect the rights, property, or personal safety of RADARME, its users or others.

### **3. YOUR LOCATION**

3.1 We collect information about your location in order to provide you certain functionalities of the Service.

3.2 We will collect your location where it is necessary for the purposes of providing you with the location-based services features of the app as well as for the legitimate interests of RADARME.

3.3 You can turn off location sharing in one or more of your Circles – if you do so, we will continue to collect your location information in order to provide you the Service.

3.4 You can also stop sharing your location with us at any time by updating the settings on your mobile device to limit the app's access to your location information. Please note, however, that we may not be able to provide all of the functionalities of our Services to you if you disable access to location data.

3.5 If you no longer want to continue using the Service, uninstalling the RadarSmart app or logging out from the Service will also stop us from collecting your location.

### **4. MARKETING MESSAGES AND NOTIFICATIONS**

4.1 From time to time, we may contact you with information about our products and services. Most of the marketing messages we send will be by email or through push notifications on your device.

4.2 We will only send you marketing messages if you have given us your consent to do so. We will ask you if you would like to receive these messages when we first collect your contact details.

4.3 You can change your preferences at a later date by clicking on the unsubscribe link at the bottom of our marketing newsletters.

4.4 Please note that if you do opt-out of or do not grant consent to receiving marketing related messages from us, we may still send you non-marketing messages, such as communications relating to the provision of our Service.

### **5. TARGETED ADVERTISING**

We may share information about your use of our Services over time, including location information, with third party ad networks, social media companies and other third parties so that they may play or display ads that may be relevant to your interests on our Service as well as on other websites, apps or services, or on other devices you may use. We may also display targeted

advertising to you through social media platforms, such as Facebook, Twitter, Google+ and others. These third party ad partners collect and use information such as click stream information, timestamp, hashed email address, device ID or AdID, and information about your use of third party applications, and may combine this information with information they collect directly through tracking technologies or that they receive from other partners, both online and offline, so that they may recognise you across various devices you use, including computers, mobile devices and Smart TVs.

## **6. STORING AND TRANSFERRING YOUR PERSONAL INFORMATION**

**6.1 Security.** We implement appropriate, commercially reasonable technical and organisational measures to protect your personal information against accidental or unlawful destruction, loss, change or damage. However, no security system is impenetrable and we cannot guarantee the security of our systems 100%. We will never send you unsolicited emails or contact you by phone requesting your account ID, password, credit or debit card information or national identification numbers.

**6.2 Onward Transfer.** Where we transfer personal information to a third party, will take reasonable and appropriate steps to ensure the third-party processes personal information for limited and specified purposes. Where the transfer is to a third-party agent acting on our behalf, we may be liable if such third parties fail to meet those obligations, and we are responsible for the event giving rise to the damage. In certain situations, we may be also required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

## **7. USERS' RIGHTS IN RESPECT OF THEIR PERSONAL INFORMATION**

**7.1** In accordance with applicable privacy law, you have the following rights in respect of your personal information that we hold:

(a) **Right of access.** You have the right to obtain:

- (i) confirmation of whether, and where, we are processing your personal information;
- (ii) information about the categories of personal information we are processing, the purposes for which we process your personal information and information as to how we determine applicable retention periods;
- (iii) information about the categories of recipients with whom we may share your personal information; and
- (iv) a copy of the personal information we hold about you.

(b) **Right of portability.** You have the right, in certain circumstances, to receive a copy of the personal information you have provided to us in a structured, commonly used, machine-readable format that supports re-use, or to request the transfer of your personal data to another person.

(c) **Right to rectification.** You have the right to obtain rectification of any inaccurate or incomplete personal information we hold about you without undue delay.

(d) **Right to erasure.** You have the right, in some circumstances, to require us to erase your personal information without undue delay if the continued processing of that personal information is not justified.

(e) **Right to restriction.** You have the right, in some circumstances, to require us to limit the purposes for which we process your personal information if the continued processing of the personal information in this way is not justified, such as where the accuracy of the personal information is contested by you.

*(f) **Right to object.** You have a right to object to any processing based on our legitimate interests where there are grounds relating to your particular situation. There may be compelling reasons for continuing to process your personal information, and we will assess and inform you if that is the case. You can object to marketing activities for any reason.*

7.2 You may review and edit your contact and profile information by logging into your account on the app, and opt out of certain processing activities. Please note that we may not be able to provide some functionalities of our Services to you if you opt-out of the collection and/or sharing event data.

7.4 You also have the right to lodge a complaint to your national data protection authority. Further information about how to contact your local data protection authority is available at [http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm).

## **8. CONSENT**

8.1 We are not required to obtain your consent for most of the processing activities that we undertake in respect of your personal information.

8.2 We may, however, need your consent for certain processing activities. If we need your consent, we will notify you of the personal information we intend to use and how we intend to use it.

8.3 If you have provided consent for certain processing of your personal information, you have the right to withdraw your consent. If you withdraw your consent, this will not affect the lawfulness of our processing of your personal information before your withdrawal.

## **9. COOKIES AND SIMILAR TECHNOLOGIES**

9.1 Our websites use cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website or access any of our other websites and also allows us to improve our websites.

9.2 Please see our for more information about the cookies we use on our website, and how to manage cookies.

9.3 Deleting or blocking cookies may not be effective for all types of tracking technologies, such as Local Storage Objects (LSOs) like HTML5.

## **10. CONTACT RADARME AND RECOURSE**

10.1 European Union or Swiss individuals with inquiries or complaints regarding this privacy policy should contact us at [help@radarsmart.eu](mailto:help@radarsmart.eu).

10.2 In the event that you are concerned about how personal information you have provided to RADARME has been used, please address your inquiry or complaint first to us at the address listed above. RADARME takes all concerns about privacy and use of personal information very seriously, and shall endeavour to reply to you within 45 days of receiving a complaint.

## **11. LINKS TO THIRD PARTY SITES**

Our Service may, from time to time, contain links to and from third party websites, including those of other users, our partner networks, advertisers, partner merchants, news publications, retailers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for their policies. Please check the individual policies before you submit any information to those websites.

## **12. OUR POLICY TOWARDS CHILDREN**

12.1 The Service may only be used by children with the consent of a parent or person with parental responsibility over the child.

12.2 The age at which children need parental consent varies between EEA Countries. Please refer to **Annex 3** to verify the minimum age at which children no longer need consent to use our Service (the "**Minimum Age**").

12.3 We will use the personal information of users under the relevant Minimum Age as set out in this privacy policy. We do not, however, use or share personal information collected from accounts of children under the Minimum Age for marketing or advertising purposes, nor permit our third party partners to collect and use such information for advertising purposes. We also do not contact, or permit third parties to contact any children under the Minimum Age who access or use our Service. However, other users with whom the child has added to his or her Circles will be able to contact the child.

12.5 If you become aware that your child has provided us with personal information without your consent, please contact us using the details below so that we can take steps to remove such information and terminate any account your child has created with us.

12.6 If you would like to review or delete any personal information we have collected from the child, or to withdraw permission for us to collect any information from the child, please contact us at [help@radarsmart.eu](mailto:help@radarsmart.eu).

## **13. CHANGES TO THIS POLICY**

We may update this privacy policy from time to time and so you should review this page periodically. When we change this privacy policy in a material way, we will update the "last modified" date at the end of this privacy policy. Changes to this privacy policy are effective when they are posted on this page.

## **14. NOTICE TO YOU**

If we need to provide you with information about something, whether for legal, marketing or other business related purposes, we will select what we believe is the best way to get in contact with you. We will usually do this through email or by placing a notice on our Service. The fact that we may send notices to you will not stop you from being able to opt out of certain types of contact as described in this privacy policy.

## **15. CONTACTING US**

Please contact [help@radarsmart.eu](mailto:help@radarsmart.eu) if you have any questions, comments and requests regarding this Privacy Policy.

## Annex 1 – PERSONAL INFORMATION WE COLLECT

Category of personal information	How we may use it	Legal basis for the processing
<b>Contact information</b> such as your phone number and e-mail address.	We may use this information for account authentication.	The processing is necessary for the performance of a contract and to take steps prior to entering into a contract.
	We may use this information to deal with enquiries and complaints made by or about you relating to the Service.	The processing is necessary for our legitimate interests, namely administering the Service, and for communicating with you effectively to respond to your queries or complaints.
	We may use this information to communicate with you, including sending service-related communications.	The processing is necessary for the performance of a contract and to take steps prior to entering into a contract.
	We may use this information to send you unsolicited marketing communications in accordance with your preferences.	We will only use your personal information in this way to the extent you have given us consent to do so.
<b>Profile information</b> , such as your username, profile picture, date of birth, gender and other users in your Family or Circle.	We may use this information to operate, maintain and provide to you the features and functionality of the Service.	The processing is necessary for the performance of a contract and to take steps prior to entering into a contract.
	We may use this information to personalise your profile so that you can interact with and be recognised by users in your Family or Circle.	The processing is necessary for the performance of a contract and to take steps prior to entering into a contract.
<b>Information about your precise location.</b> In order to use certain functionalities of the Service, we will ask you to provide your precise location, altitude, heading and speed.	We may use this information to provide you the functionalities of the Service.	The processing is necessary for the performance of a contract and to take steps prior to entering into a contract.
	<p>We may share this information with third party advertising partners and market researchers.</p> <p>These parties may use your personal information to:</p> <ul style="list-style-type: none"> <li>• create a profile about you based on places you have visited;</li> <li>• serve targeted advertisements to you based on the places you have visited;</li> <li>• <del>analyse</del> the effectiveness of advertising campaigns and promotions.</li> </ul>	We will only process your personal information in this way to the extent you have given us your consent to do so.



<b>Chat, comments and opinions.</b> When you contact us directly, e.g. by email, phone, or when you participate in a chat on our Service, we will record your comments and opinions.	We may use this information to operate, maintain and provide to you the features and functionality of the Service.	The processing is necessary for the performance of a contract and to take steps prior to <a href="#">entering into a contract</a> .
	We may use this information to address your questions, issues and concerns.	The processing is necessary for our legitimate interests, namely communicating with users and responding to queries, complaints and concerns.
	We may use this information to develop new products and features available through our Service or otherwise improve our Service.	The processing is necessary for our legitimate interests, namely developing and improving our Service.
<b>Information about your subscription to our Service</b> , such as your subscription level (i.e. whether you are using a free or premium version of our Service), the date and time that you activated your account, the duration of your subscription, the date you unsubscribe, and any in-app purchases.	We use this information to operate, maintain and provide to you the features and functionality of the Service.	The processing is necessary for the performance of a contract and to take steps prior to <a href="#">entering into a contract</a> .
	We use this information to develop new products and features available through our Service or otherwise improve our Service.	The processing is necessary for our legitimate interests, namely developing and improving our Service or certain features of our Service.
	We use this information to determine products and services that may be of interest to you.	The processing is necessary for our legitimate interests, namely informing our direct marketing.
<b>Payment and transaction information</b> , such as your credit card, payment authentication code, billing address, and other information such as date and time of your transaction.	We use this information to process your purchases through our Service.	The processing is necessary for the performance of a contract and to take steps prior to <a href="#">entering into a contract</a> .
	We may use this information to detect and prevent fraud.	The processing is necessary for our legitimate interests, namely the detection and prevention of fraud.
<b>Information received from third parties, such as social networks.</b> If you interact with our Service through a social network, we may receive	We may use this information to promote our Service, such as tagging you in comments on our social media pages.	The processing is necessary for our legitimate interests, namely promoting our Service.
information from the social network such as your name, profile information, and any other information you permit the social network to share with third parties. The data we receive is dependent on your privacy settings with the social network.	We may use this information to determine products and services that may be of interest to you.	The processing is necessary for our legitimate interests, namely informing our direct marketing.
<b>Your preferences</b> , such as preferences set for notifications, marketing communications, how our Service is displayed and the active functionalities on our Service.	We use this information to provide notifications, send news, alerts and marketing communications and provide our Services in accordance with your choices.	The processing is necessary for our legitimate interest, namely ensuring the user receives the correct marketing and other communications.
	We use this information to ensure that we comply with our legal obligation to send only those marketing communications to which you have consented.	The processing is necessary for compliance with a legal obligation to which we are subject.
<b>All personal information set out above.</b>	We will use all the personal information we collect to operate, maintain and provide to you the features and functionality of the Service, to communicate with you, to monitor and improve our Service and business, and to help us develop new products and services.	The processing is necessary for our legitimate interests, <a href="#">namely</a> to administer and improve the Service.

## Annex 2 – PERSONAL INFORMATION COLLECTED AUTOMATICALLY

Category of personal information	How we may use it	Legal basis for the processing
<b>Information about how you access and use the Service.</b> For example, the website from which you came and the website to which you are going when you leave our website, how frequently you access the Service, the time you access our Service and how long you use it for, clicks or mouse movements made by the user the approximate location that you access the Service from, whether you access the Service from multiple devices, and other actions you take on the Service.	We may use information about how you use and connect to our Service to present our Service to you on your device.	The processing is necessary for our legitimate interests, <u>namely</u> to tailor our Service to the user.
	We may use this information to determine products and services that may be of interest to you for marketing purposes	The processing is necessary for our legitimate interests, <u>namely</u> to inform our direct marketing.
	We may use this information to monitor and improve our Service and business, resolve issues and to inform the development of new products and services.	The processing is necessary for our legitimate interests, <u>namely</u> to monitor and resolve issues with our Service and to improve our Service generally.
<b>Log files and information about your device.</b> We also collect information about the computer, tablet, smartphone or other electronic device you use to connect to our Service. This information can include details about the type of device, unique device identifying numbers (such as Android AdIDs and	We may use information about how you use and connect to our Service to present our Service to you on your device.	The processing is necessary for our legitimate interests, <u>namely</u> to tailor our Service to the user.
	We may use this information to determine products and services that	The processing is necessary for our legitimate interests, <u>namely</u> to inform our direct marketing.
Apple Identifier for Advertisers), battery charge, operating systems, browsers and applications connected to our Service through the device, your Internet service provider or mobile network, your IP address, and your device's telephone number (if it has one)	We may use this information to monitor and improve our Service and business, resolve issues and to inform the development of new products and services.	The processing is necessary for our legitimate interests, <u>namely</u> to monitor and resolve issues with our Service and to improve our Service generally.
	We may share your device identifiers and other information about your device with third party advertising partners and market researchers.  These parties may use your personal information to: <ul style="list-style-type: none"> <li>• create a profile about you based on the type of device you use;</li> <li>• match the information linked to your device identifiers with information collected from other sources;</li> <li>• serve advertisements to you based on the profile created about you;</li> <li>• analyse the effectiveness of advertising campaigns and promotions.</li> </ul>	
<b>Information about your current device state,</b> such as the remaining battery charge on your device and whether it is connected to <u>wifi</u> .	We may use this information to provide you with certain functionalities of the Service.	The processing is necessary for the performance of a contract or to take steps prior to entering into a contract.
<b>Approximate location information.</b> Other than information you choose to provide to us, we do not collect information about your precise location.	We may use an approximate location to inform and plan our marketing strategy.	The processing is necessary for our legitimate interest, <u>namely</u> informing our direct marketing strategy.

<b>Approximate location information.</b> Other than information you choose to provide to us, we do not collect information about your precise location. Your device's IP address may help us determine an approximate location.	We may use an approximate location to inform and plan our marketing strategy.	The processing is necessary for our legitimate interest, namely informing our direct marketing strategy.
<b>Information about how you react to emails,</b> such as whether you have opened an email from us, or clicked on a link in an email we send to you.	We may use this information to analyse the effectiveness of our email campaigns.	The processing is necessary for our legitimate interest, namely informing our direct marketing strategy.

### Annex 3 – MINIMAL AGES

Country	Minimum Age
Austria	14
Belgium	13
Bulgaria	14
Croatia	16
Cyprus	14
Czech Republic	15
Denmark	13
Estonia	13
Finland	13
France	15
Germany	16

Country	Minimum Age
Greece	15
Hungary	16
Iceland	13
Ireland	16
Italy	14
Latvia	13
Liechtenstein	16
Lithuania	16
Luxembourg	16
Malta	16

Country	Minimum Age
Norway	13
Poland	13
Portugal	13
Romania	16
Slovakia	16
Slovenia	15
Spain	13
Sweden	13
Switzerland	16
The Netherlands	16
United Kingdom	13