

PRIVACY POLICY FOR THE PROCESSING OF CUSTOMER INFORMATION FOR NAVIBLIND APS

1. GENERAL INFORMATION

- 1.1 NaviBlind, hereafter "**the App**", is an electronic navigation aid that connects to a GPS device and assists blind and partially sighted people in finding their way.
- 1.2 This document relates to NaviBlind ApS ("**we**" or "**us**") and contains NaviBlind ApS's privacy policy regarding the collection and processing of Personal Data (this "**Privacy Policy**").

2. DEFINITION

- 2.1 "**Applicable Data Protection Legislation**" refers to the General Data Protection Regulation (Regulation 2016/679), as supplemented and implemented by Act No 502 of 23 May 2018 (Data Protection Act) and related national legislation, as well as Directive 2002/58/EC of the European Parliament and of the Council of 12 July 2002 concerning the processing of personal data and the protection of privacy in the electronic communications sector (E-Privacy Directive) and national implementations thereof.
- 2.2 "**Personal data**" means any information relating to a natural person who can be identified, directly or indirectly, by an identifier such as name, address, location data or IP addresses.
- 2.3 "**Processing**" means any activity to which personal data are subjected as for example, collection, organisation, storage, deletion or disclosure.
- 2.4 "**Controller**" refers to us in this case, as we determine for what purposes and with what means by which Personal Data may be processed.

3. PROCESSING OF PERSONAL DATA

- 3.1 We Process the following Personal Data when you create a user account with us:
 - a) full name;
 - b) address
 - c) e-mail address; and
 - d) phone number.
- 3.2 We are unable to create you as a user unless you provide us with the above Personal Information.
- 3.3 We may Process the following Personal Information that you provide when you are logged into the App:
 - a) location information (to show you relevant routes in your local area);

- 3.4 When you request a new private route, we Process the following Personal Data:
- a) start address from where you want to start your route.
 - b) final address where you want to go to
- 3.5 When you report defects or improvements, we Process the following Personal Data:
- a) technical data, including information about your device (model, screen size, processor and operating system);
 - b) location information; and
 - c) name and e-mail address.
- 3.6 If you have subscribed to our newsletter:
full name, email address
- 3.7 We may also process information about your unique user ID.

4. THE PURPOSE OF THE TREATMENT

- 4.1 We Process the above Personal Data for the following purposes:
- a) to manage your user account;
 - b) to provide the requested Services, such as new routes;
 - c) to deliver newsletters and marketing from us and our partners;
 - d) to inform you of service announcements and communicate with you;
 - e) to improve and develop the App, and to analyse your use of our service; and
 - f) to ensure the technical functioning of the Service and to prevent use of the Service contrary to the Terms of Use.

5. AUTOMATED INDIVIDUAL DECISIONS, INCLUDING PROFILING

- 5.1 Your Personal Data is not subject to automatic processing.

6. LEGAL BASIS

- 6.1 Below you can see for each processing purpose on what basis we process your Personal Data:

Personal data	Purpose	Treatment basis
- full name; - address - e-mail address; and - phone number.	To manage your user account Point above: 4.1 a). To deliver newsletters and marketing from us and our partners.	The processing is necessary for the performance of a contract with you or for carrying out pre-contractual measures.

	<p>That you have given your consent to receive news emails from us on our website. Point above: 4.1 c).</p> <p>To inform you of service messages communicating with you. For example, you will receive information about when your route has been completed. You can also get information about when the exact start address has been shared with the user. Point above: 4.1 d).</p>	<p>You have consented to the Processing of the Personal Data.</p>
<ul style="list-style-type: none"> - the starting address from where you want to start your route; and - final address where you want to go to. 	<p>To provide the requested Services, such as new routes. Point above: 4.1 b)</p>	<p>The processing is necessary to pursue our legitimate interests in the App's Service, namely to assist blind and visually impaired for navigation.</p>
<ul style="list-style-type: none"> - technical data, including information about your device (model, screen size, processor and operating system); - location information; - name and e-mail address; and - information about your unique user ID. 	<p>To improve and develop the Service, and to analyse your use of the Service. Point above: 4.1 e).</p> <p>To ensure the technical functioning of the Service and to prevent use of the Service contrary to the Terms of Use. Point above: 4.1(f).</p>	<p>The processing is necessary for the performance of a contract with you or for carrying out pre-contractual measures. The processing may also be necessary to pursue our legitimate interests in communicating with you.</p>

6.2 You have the unconditional right to object to the Processing of your Personal Data for direct marketing purposes. You also have the right to withdraw your prior consent. The withdrawal of your consent does not affect the lawful Processing of the Personal Data prior to the withdrawal, nor may we continue to Process your Personal Data on any other lawful basis other than for direct marketing.

6.3 If you object to the Processing of your Personal Data which is processed on the basis of our legitimate interests, we will immediately stop processing your data for those purposes.

7. RECIPIENTS OF PERSONAL DATA

- 7.1 We may share and disclose your Personal Information to relevant recipients such as providers of hosting services for our website.
- 7.2 When you visit our website, you may be directed to other websites where the Processing of your Personal Data is not under our control. The privacy policies of those other websites govern the Processing of your Personal Data on that website.

8. RESPONDING TO LEGAL ENQUIRIES AND PREVENTING HARM

We may access, retain and share your Personal Information to respond to a legal request (for example, search warrants, court orders, subpoenas or the like), or if necessary to detect, prevent or prosecute fraud or other illegal activity, protect ourselves, you or other users, including as part of an investigation.

9. COOKIES, PIXELS AND OTHER SYSTEM TECHNOLOGIES

We do not collect information using technology such as cookies, pixels and local storage (on your browser or device).

10. STORAGE OF PERSONAL DATA

- 10.1 We will keep your Personal Information until you choose to delete your profile. If we have obtained consent for marketing, we will keep the consent for as long as we use it and until two years after it was last used.

NaviBlind ApS keeps statistics of the number of completed routes, number of route requests and other use of the App.

11. CHILDREN

We do not collect Personal Data from persons under the age of 15 with knowledge. Please contact NaviBlind ApS if you become aware that a child of whom you are a parent or guardian has given us access to Personal Data without your consent, to exercise your right to access, rectify, erase, restrict or object to the Processing of the Personal Data.

12. YOUR RIGHTS

- 12.1 You are entitled to request access to and further information about the Processing of your Personal Data, or to request that we correct, rectify, complete, erase or restrict the Processing of your Personal Data. You are entitled to request two (2) times per year

a free copy of your Personal Data that we process. We are entitled to charge a reasonable fee based on our administrative costs if you request additional copies.

- 12.2 You are entitled to restrict the Processing of your Personal Data if;
- i. you have challenged the accuracy of the Personal Data,
 - ii. the processing is unlawful and you have requested its restriction,
 - iii. we no longer need your Personal Data for the original purpose, but we require it to establish, exercise or defend rights; or
 - iv. an assessment of the overriding consideration in a request for erasure is ongoing.

- 12.3 Where our Processing is automatic and based on consent or performance of a contract, you have the right to data portability. Data portability means that you can receive the Personal Data to which you have given us access in a structured, commonly used and machine-readable format and that you have the right to transfer the Personal Data to another controller.

13. CONTACT INFORMATION

- 13.1 If you wish to exercise your rights or have any questions regarding our Processing of your Personal Data, please contact us at jonathan@navibind.com. If you wish to unsubscribe as a user, you can do so by writing an email to jonathan@navibind.com. In your e-mail, please provide your full name and the e-mail address used for registration if you wish to exercise your rights as described above.

- 13.2 If you wish to complain about our Processing of your Personal Data, you have the possibility to submit your complaint to the competent local supervisory authority. You can read more about the local supervisory authorities at the following link:
http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

14. NOTICE OF CHANGE TO THIS PRIVACY POLICY

If we make changes to this Privacy Policy, we will notify you here on our website and by email. If the changes require your consent, we will provide you with additional, separate notice and request your consent in accordance with Applicable Personal Data Law.