



SPOTLIO Apps Privacy Policy

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We are committed to protecting your personal data and your right to privacy. Please read our Privacy Policy carefully as it will help you make informed decisions about sharing your personal data with us. If you have any questions or concerns about our policy, or our practices with regards to your personal data, [please contact us](#).

PLEASE READ THE SPOTLIO APPS PRIVACY POLICY AND ALL REFERENCED OR LINKED MATERIALS CAREFULLY BEFORE USING NATIVE AND/OR WEB APPS PROVIDED BY SPOTLIO AS A DATA CONTROLLER OR AS DATA PROCESSOR ON BEHALF OF THE DATA CONTROLLER WHO OWNS THE APPS. IF YOU GIVE SPOTLIO OR THE APP OWNER CONSENT FOR ONE OR MORE SPECIFIC PURPOSE TO PROCESS YOUR PERSONAL DATA, WE PROCESS YOUR DATA UNDER THE RULES SET IN THIS PRIVACY POLICY AND THE UNDERLYING NATIONAL AND INTERNATIONAL LAWS.

1. General; Contact Information

This Apps Privacy Policy of SPOTLIO complies with Swiss and EU laws as well as with the U.S. E.U. Safe Harbor framework and the U.S. - Swiss Safe Harbor framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of data from the European Union and Switzerland respectively. Information regarding the both the E.U. and Swiss Safe Harbor Frameworks can be found at: <http://export.gov/safeharbor>.

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Data Protection Officer: Urs Grimm, CFO Spotlio AG

[Contact us by clicking here](#).

2. Information We Collect

As a User, you can browse our Native and Web Apps without being required to provide us with any personal data.

We collect your personal data when:

- You're giving us consent by registering or signing in as an app user ("App User") or as a business or service provider ("Participant"). Both of them referred as "Users";

- The data processing is necessary for the performance of a contract in which the User is a participant or necessary in order to take steps (requested by the user) prior to entering the contract;
- The processing is necessary for fulfilling a legal obligation to which the Data Controller is subject;
- The processing is necessary for protecting the vital interests of the Users or of another person;
- The processing is necessary for performing a task carried out in the interest of the public or as contained under the official authority given to the Data Controller;
- The processing is necessary for the legitimate interests of the Data Controller or third party, except where overridden by the interests, rights and freedoms of the Users, in particular where the user is a child.

Generally, you control the amount and type of information you provide to us when using our Services. The personal data that we collect depends on the context of your interaction with our Services and SPOTLIO, the choices you make and the products and features you use. The personal data we collect can include the following:

- Name, Email Address and Contact Data
- Payment Information. If you choose to buy something through our Services, we collect payment information through our payment processor. All payment information is securely stored by our payment processor and we do not have access to your sensitive information, such as credit card number or security code.
- Business Information. If you choose to use our Services as a Participant, we may ask specific information related to your business in order to create communications and promotions.

3. Automatically Collected Information

When you use our apps or related websites (“Services”), we automatically collect certain computer information by the interaction of your mobile phone or web browser with our mobile applications. Such information is typically considered non-personal data. We also collect the following:

Cookies

Our Services use “Cookies” to identify the areas of our Services that you have visited. A Cookie is a small piece of data stored on your computer or mobile device by your web browser. We use Cookies to personalize the content that you see on our Services. Most web browsers can be set to disable the use of Cookies.

However, if you disable Cookies, you may not be able to access functionality on our Service correctly or at all. We never place personally identifiable information in Cookies.

Third Party Tracking Tools

We also use third party tracking tools to improve the performance and features of our Services. These third party tracking tools are designed to collect only non-personal data about your use of our Services. However, you understand that such tools are created and managed by parties outside our control. As such, we are not responsible for what information is actually captured by such third parties or how such third parties use and protect that information.

Log Information

We automatically receive information from your web browser or mobile device. This information includes the name of the website from which you entered our Services, if any, as well as the name of the website to which you're headed when you leave our Services. This information also includes the IP address of your computer/proxy server that you use to access the internet, your internet website provider name, web browser type, type of mobile device, and computer operating system. We use all of this information to analyze trends among our Users to help improve our Services.

4. How and Why We Use Your Personal Data

We use the information we receive from you as follows:

- **To allow you to create a profile as an End User or as a Participant.**
We use your information to create your profile and grant secure access.
- **To customizing our Services for your experience.**
We may use the information you provide to us along with any digital information we receive to customize our Services.
- **For data aggregation purposes**
We retain the right to collect and use any non-personal data collected from your use of our Services and aggregate such data for internal analytics that improve our Services as well as for use or resale to others. At no time is your personally identifiable data included in such data aggregations.

5. Transfer Of Your Personal Data

Your information, including personal data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your personal data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

6. Disclosure Of Your Personal Data

If we are involved in a merger, acquisition or asset sale, your personal data may be transferred. We will provide notice before your personal data is transferred and becomes subject to a different Privacy Policy.

Under certain circumstances, we may be required to disclose your personal data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

7. Retention of Your personal data

We will retain your personal data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

8. Information Regarding Your Data Protection Rights Under General Data Protection Regulation (GDPR)

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. In certain circumstances, you have the following data protection rights:

- The right to access, update or to delete the personal data we have on you
- The right of rectification

- The right to object
- The right of restriction
- The right to data portability
- The right to withdraw consent

If you wish to exercise any of these rights, [please contact SPOTLIO by clicking here.](#)

Please note that we may ask you to verify your identity before responding to such requests.

You have the right to complain to a Data Protection Authority about our collection and use of your personal data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

9. Service Providers

We employ third party companies and individuals to facilitate our Services ("Service Providers"), to provide our Services on our behalf, to perform Services-related services or to assist us in analyzing how our Services are used. These third-parties have access to your personal data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

Analytics

Google, Apple and Facebook Analytics are analytics services offered by the respective company that track and report traffic with our Services. These analytic services uses the data collected to track and monitor the use of our Services. The collected not personal data is shared with other services. The Analytics providers may use the collected data to contextualize and personalize the ads of its own advertising networks.

You can opt-out of having made your activity on the Service available to the Analytics Providers by installing the Analytics opt-out add-ons in your browser if available. These add-ons prevent the Analytics Providers from sharing information about visits activities.

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <http://www.google.com/intl/en/policies/privacy/>

For more information on the privacy practices of Apple, please visit the Apple Privacy & Terms web page: <https://www.apple.com/legal/privacy/en-ww/>

For more information on the privacy practices of Facebook, please visit the Facebook Privacy & Terms web page:

https://www.facebook.com/full_data_use_policy

Payments processors

If SPOTLIO provides paid products through our Services, we use third-party services for payment processing (e.g. payment processors).

We will not store or collect your payment card details. That information is provided directly to our third-party payment processors whose use of your personal data is governed by their Privacy Policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council.

10. Protecting Your Child's Privacy

Our Services are not designed for use by anyone under the age of 13 ("Child"), though we realize we may have a Child attempt to make purchases through our Services. We do not verify the age of our Users nor do we have any liability for verifying a User's age. If you are a Child, please seek the permission of a parent or guardian before using our Services. If you are a parent or guardian and believe your Child is using our Services, please contact us to remove your Child's account; we reserve the right to ask you for verification of your relationship to the Child before we honor such a request. If we discover that a Child has created an account on our Services, we will immediately delete the account as soon as we discover it, we will not use the information for any purpose, and we will not disclose the information to third parties. However, as parent of such a Child, you understand that you are legally liable for any transactions created by the Child.

11. Links to Third-Party Services

Our Services may contain links to or call other services that are not under our direct control. These services may have their own policies regarding privacy. We have no control of or responsibility for linked services and provide these links solely for the convenience and information of our users. You access such linked services at your own risk. These services are not subject to this Privacy Policy. You should check the privacy policies, if any, of those individual services to see how the operators of those third-party services will utilize your personal data in case there is such data.

12. Our Email Policy

Our affiliates and we fully comply with national and international laws regarding SPAM. You can always opt out of receipt of further optional email correspondence from us and/or our affiliates. We agree that we will not sell, rent, or trade your email address to any unaffiliated third-party without your permission.

13. Updates to the Apps Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this policy, we may notify you on our Services, by a pop-up window, by a blog post, by email, or by any method we determine. The method we chose is at our sole discretion. We will also change the "Last Updated" date at the beginning of this Privacy Policy. Any changes we make to our Apps Privacy Policy are effective as of this Last Updated date and replace any prior Privacy Policies.