



ROAM B.V.

# PRIVACY POLICY

(US-based End Users)

***Last Updated: May 2025***

## **PREAMBLE**

Welcome to Roam B.V.'s Privacy Policy.

This Privacy Policy will inform you as to how we look after your personal data when:

- You visit our website <https://www.roam.ai> (regardless of where you visit it from);
- We sell your personal data which we have obtained from third parties (subject to you not opting- out from reselling of your personal information);
- You download a mobile application belonging to one of our partners who may share some of your personal data with Roam, whether:
  - o by using a Server-to Server integration, or
  - o by integrating our Software Development Kit ("**SDK**") into their mobile application,thereafter together referred to as our "**Partner(s) App**".

For the purposes of this Privacy Policy, we refer to those individuals browsing our website or using a mobile application integrating our Product as "**End User(s)**" or "**you**".

This Privacy Policy also provides you with details about the personal information we collect from or about you, how we use your personal information and your rights to control personal information we hold about you (such as your right to opt-out from selling of your personal data).

## **1. ACCEPTANCE**

**Please read this Privacy Policy carefully – by accessing or browsing our website or using a Partner App, you confirm that you have read, understood and agree to this Privacy Policy in its entirety. If you do not agree to this Privacy Policy in its entirety, you must not use this website or any relevant Partner App.**

## **2. WHO ARE WE?**

Roam B.V. is a company registered in Amsterdam, Netherlands, under registration number 741627, and whose registered office is at **Van Baerlestraat 126 1, 1071 BD Amsterdam, Netherlands**

Roam respects your privacy and is committed to protecting your personal data in accordance with the EU General Data Protection Regulation 2016/679 ("**GDPR**" - when collecting data from citizens of the European Union), as well as the provisions of the California Consumer Privacy Act 2018 ("**CCPA**" – when collecting data from consumers residing within the State of California, United States).

To this effect, we have appointed a data protection officer ("**DPO**") who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about how we collect, store and use your personal information, or if you have any other privacy-related questions, please contact our DPO by any of the following means:

- By e-mail at [legal@roam.ai](mailto:legal@roam.ai)
- By post at our registered office's address mentioned above.

## **3. WHAT DO WE DO?**

Roam B.V. is a company based in the Netherlands, specializing in collecting and refining mobile data. We analyze data, some of which may be deemed personal data, derived from publishers or developers' mobile applications:

- Which share data with us on a Server-to-Server basis; or
- Which have integrated our SDK.

This allows us to provide our clients or business partners with statistics and insights with respect to their audience.

Alternatively, we may also share your data with selected third parties so that you can see adverts for products and services which are targeted, based on how you use your Partner App.

We may either collect such data directly via our SDK, or we may also receive such data directly from our trusted partners for the purpose of reselling it to third party companies, unless you have opted-out to such.

A list of such third parties is provided at **Appendix 1** for your information.

#### **4. PERSONAL DATA WE COLLECT ABOUT YOU**

**“Personal data”**, or personal information, means any information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household”.

Data which has been anonymized or aggregated is not personal data.

In the course of providing its services, Roam may collect personal data about you. Such information can be grouped together as follows:

##### **Information related to website users and Roam’s clients:**

- **Automated technologies or interactions.** As you interact with our website, we will automatically collect technical data about your equipment, browsing actions and patterns. This helps us to provide you with a good experience when you browse our website and also allows us to improve it. We collect this personal data by using cookies, server logs and other similar technologies.
- **Information you share with us when you sign up to a client account on our website.** If you register as a new client by creating an account on our website, which is a prerequisite to subscribe to our services, you will be asked to provide your name, surname, company name, professional e-mail address and professional phone number. We collect this information to be able to verify your account and contact you if needs be, as well as sending you information in relation to our Services.

##### **Information related to End Users of Partners Apps:**

If you use a Partner App, we are likely to collect the information listed below about your device. Alternatively, we may also receive such information directly via our trusted partners, unless you have opted-out to such.

- **Data Identifiers:** includes End Users’ hashed MD5 email (if in-app sign-in available in the mobile application), iOS® Identifier for Advertising (on iOS only) or Android™ Advertiser ID (on Android only).
- **Technical Data:** includes the type of mobile you use (including manufacturer and model), your time zone and language settings and location, operating system and platform, and other technology on the devices you use to access our Partners Apps.
- **Usage data:** includes what Partner App you have opened (including the nature and category of those applications) and your usage level of such Partner App.

##### **Aggregated Data**

We also collect, use, or sell **Aggregated Data** such as statistical data to create statistics about the general use of mobile applications, which helps Roam to improve existing services or develop new services.

Aggregated Data (also known as “deidentified” information) could be derived from your personal data but is not considered personal data in law as this data cannot reasonably identify or be linked, directly or indirectly, to a particular End User. For example, we may aggregate your Usage Data to calculate th

percentage of End Users accessing a specific App feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

### **A quick word about children**

We will never knowingly collect or sell information from any unsupervised child under the age of 16. If you are under the age of 16, you may not use our Partner App and Roam declines any liability for unsupervised children doing so.

### **Personal Data collected in the last 12 months**

The categories of Personal Data which may have been collected by Roam within the last 12 months are identical to those mentioned above.

## **5. HOW WE MAY USE YOUR INFORMATION**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so.

### **Information related to website users and Roam's clients:**

<b>Purpose/Activity</b>	<b>Type of data</b>
To register you as a new customer/ provide our services	(a) Identity (b) Contact
To process and deliver our services, including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications
To manage our relationship with you which will include notifying you about changes to our terms or Privacy Policy	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications

<p>To comply with laws or to allow us to enforce the terms of these Principles.</p> <p>To respond to lawful requests and legal processes.</p> <p>To protect the rights and property of Roam, our agents, customers, and others.</p> <p>To protect the safety of our employees and agents, our Partners or any other person.</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Financial</p> <p>(d) Transaction</p> <p>(e) Marketing and Communications</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p> <p>(f) Technical</p>

#### **Information related to End Users of Partners Apps:**

<b>Purpose/Activity</b>	<b>Type of data</b>
To provide our services to publishers, advertisers or other selected third parties to help them get an understanding of how End Users are using Partners Apps.	<p>(a) Profile</p> <p>(b) Technical</p> <p>(c) Marketing and Communications</p>
To allow selected third parties to provide you with tailored services and the display of customized content and targeted advertising, both on the Partner App and on other third-party apps.	<p>(a) Profile</p> <p>(b) Technical</p> <p>(c) Marketing and Communications</p>

## **6. OPT-OUT RIGHT FOR PERSONAL INFORMATION SALES**

You have the right to **opt-out from Roam** selling your personal data to third parties directly by clicking on the “**Do not sell my Personal Information**” link available on the Homepage of our website or at the following URL: <http://roam.ai/optout>, or by clicking on such similar link provided to you on the Partner Apps.

**Please contact the Partner App directly in case you are unable to find the mechanism for opting out.**

We require that our business partners send us up to date data. Therefore, if you have opted out from selling your personal data to or by our partners at any time, we will be informed of such within a reasonable time.

Subject to the reception of an opt-out request on your part, Roam undertakes not to not request reauthorization to sell your personal information for at least 12 months after your opt-out request.

Opting out will not stop advertising from the Partner App integrating our SDK being sent to you by third parties, but Roam will no longer be able to collect data from your mobile.

## **7. DISCLOSURE OF YOUR PERSONAL DATA**

We may share your personal data with third parties as set out in **Appendix 1** for the purposes set out in the table at **section 5** above.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law.

## **8. DATA SECURITY**

We have put in place appropriate security measures (such as **data transfer encryption over HTTPS, account authentication and data rest encryption for our computer and databases storing Personal Information**) to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

Unfortunately, no data transmission or storage system over the internet can ever be guaranteed 100 % secure. If you have any reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of your account has been compromised), please contact us immediately by e-mail to the following address: [legal@roam.ai](mailto:legal@roam.ai)

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 9. DATA RETENTION

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Details of retention periods for different aspects of your personal data are set out below:

- By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for **five years** after they cease being customers for tax and accounting purposes.
- Any other information left on your customer account will be deleted within **30 days** of the date of closure.
- Data Identifiers, Technical Data and Usage Data are kept on our servers for a period of **12 months** for the necessary purpose of providing Roam's clients with relevant analytics data. Thereafter such data is **anonymized** and used for research or statistical purposes only, either by Roam or by its clients.

In some circumstances **you can ask us to delete your data**: please see **clause 10 "Your legal rights"** below for further information.

**In other circumstances, when we have anonymised your personal data (so that it can no longer be associated with you) for research or statistical purposes, we may use this information indefinitely without further notice to you.**

## 10. YOUR LEGAL RIGHTS

You have the following rights under data protection laws in relation to your personal data:

- **Right to be informed**: you have the right to be informed of the categories and purposes for which your Personal Data is collected, as well as your Opt-Out rights. This is why we make this Privacy Policy available to you at the point of collection of your Personal Data.
- **Right of access**: you have the right to ask us to provide you with copies of personal information that we have collected about you in the last 12 months period prior to your request. This includes the right for you to request the transfer of your personal data to you or

to a third party.

**Right to deletion:** you have the right to ask us to delete any personal information that we hold about you.

- **Right to Opt-Out for personal information sales:** please refer to clause 6 above for more detailed information about your right to opt-out for personal information sales.
- **Right not to be subject to discrimination for the exercise of rights:** You have the right not to be discriminated against because of the exercise of any of the above-mentioned rights.

If you wish to exercise your rights, please contact Roam by any of the following means:

- By e-mail at **legal@roam.ai** (also provided on this Privacy Policy available on our website at <https://www.roam.ai/privacy-us>)
- By post at **Roam B.V.** Van Baerlestraat 126 1, 1071 BD Amsterdam, Netherlands

## **Fee**

**You will not have to pay a fee to access your personal data** (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is **clearly unfounded, repetitive or excessive**. Alternatively, we could refuse to comply with your request in these circumstances.

## **What we may need from you**

We may need to request **specific information from you** to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## **Time limit to respond**

We will use our best endeavour to respond to all legitimate requests within **one month** from their reception. Occasionally, this timeframe may be extended **for an additional 30 days** if your request is particularly complex or you have made a number of requests. **In this case, we will notify you and keep you updated.**



## **APPENDIX 1: THIRD PARTIES**

In the course of providing our Services, we may share your personal data or Aggregated Data with the following selected third parties:

### **INTERNAL THIRD PARTIES OR PUBLIC BODIES**

- **SERVICE PROVIDERS** acting as processors based in France or the United States who provide IT hosting, system administration services or other business activities related to our services:
  - **Online.net - ONLINE SAS:** group Iliad, registered under the laws of France under number 433 115 904 with the Paris Trade & Companies Register - <https://www.online.net/fr/document-legal/mentions-legales>
  - **Amazon Web Services, USA:** Amazon Web Services is a hosting service provided by Amazon.com Inc. - Privacy Policy - Certified under the EU-US Privacy Shield
  - **Mailjet:** Mailjet is an email address management and message sending service provided by Mailjet SAS, a company registered under the laws of France under number 524 536 992 with the Paris Trade & Companies Register, and having its registered office at 13-13 bis, rue de l'Aubrac 75012 Paris, France. <https://www.mailjet.com/privacy-policy/>
  - **Strikingly:** Strikingly is a website building services provider provided by Strikingly, a Delaware company based in the USA. <https://support.strikingly.com/hc/en-us/articles/214364818-Strikingly-s-Privacy-Policy>
- **PROFESSIONAL ADVISERS** acting as processors including lawyers, bankers, auditors and insurers based in the Netherlands or in the EU who provide consultancy, banking, legal, insurance and/or accounting services.
- **GOVERNMENTAL BODIES OR LAW ENFORCEMENT AGENCIES** if required to do so by applicable law.

### **SELECTED EXTERNAL THIRD PARTIES**

- **PUBLISHERS AND DEVELOPERS:** Unless you have opted-out of such, we may share End User data with publishers or developers to aid them in their understanding of how End Users are using Partner Apps or other third-party mobile applications you have authorized us to collect relevant data from.
- **THIRD PARTY COMPANIES AND NETWORKS that require the data to select and serve relevant targeted adverts to you and others, or use the data for analysis and measurement purposes:** Unless you have opted-out of such, we may sell End User data to trusted third party companies and networks so that they can in turn perform studies and send you targeted mobile advertising based on the way you use your Partner App or other third-party mobile applications you have authorized us or our partners to collect relevant data from.

We do not disclose information about identifiable individuals to our partners, but we provide them with **Aggregated Data** about End Users (for example, we may inform them that 500 mobile devices visited a specific retail location after being exposed to an advertisement on any given day). We may also use such Aggregated Data to help advertisers reach specific audiences (for example, mobile devices in a given geographical location). **We may use the personal data we have collected from your mobile device to provide our partners with the data they need to perform their activity (analysis, measurement and advertising use-cases).** This may involve our partners sending you behavioral and location-based advertising.

- **DATA MANAGEMENT PLATFORMS:** We may share End Users Data with data management platforms that are being used by advertising companies for data sourcing purposes. The End

User data we may share may include any or all data outlined in this Privacy Policy, including some data which may be deemed personal data.

- **THIRD PARTIES** to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Policy.



