

Privacy Policy

This privacy notice for Tmi Ottoro ("I," "me," or "my"), describes how and why I might collect, store, use, and/or share ("process") your information when you use my services ("Services"), such as when you:

- Download and use my mobile application (Aurora Compass), or any other application that links to this privacy notice
- Engage with me in other related ways, including any sales, marketing, or events

Questions or concerns? Reading this privacy notice will help you understand your privacy rights and choices. If you do not agree with my policies and practices, please do not use my Services. If you still have any questions or concerns, please contact me at contact@auroracompass.com.

Personal information you disclose to me

I collect personal information that you voluntarily provide to me when you express an interest in obtaining information about me or my products and Services, when you participate in activities on the Services, or otherwise when you contact me.

Sensitive Information. I do not process sensitive information.

Application Data. If you use my application(s), I may collect the following information if you choose to provide me with access or permission:

- *Geolocation Information.* I may request the user to provide a geolocation or access/permission to automatically track location-based information from your mobile device, either in the background or while you are using my mobile application(s), to provide certain location-based services. If you wish to change access or permissions, you may do so in your device's settings.
- *Push Notifications.* I may request to send you push notifications regarding certain features of the application(s). If you wish to opt out from receiving these types of communications, you may turn them off in your device's settings.

This information is primarily needed to maintain the operation and security of my application(s), for troubleshooting, and for internal analytics and reporting purposes.

Information automatically collected

In Short: Some information — such as your Internet Protocol (IP) address and/or browser and device characteristics — is collected automatically when you visit my Services.

I automatically collect certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, app settings, push notification and session identifiers, operating system,

language preferences, referring URLs, device name, location, information about how and when you use my Services, and other technical information.

This information is primarily needed to maintain the operation and security of my Services, and also for internal analytics and reporting purposes. I may also use this data to form aggregated statistical information to the public.

The information I collect includes:

- **Log and Usage Data.** Log and usage data is service-related, diagnostic, usage, and performance information my servers automatically collect when you access or use my Services and which I record in server log files. Depending on how you interact, this log data may include your IP address, device information, session identifiers, browser type, and settings and information about your activity in the Services (such as the date/time stamps associated with your usage, pages and files viewed, searches, and other actions you take such as which features you use).
- **Location Data.** I collect location data such as information about your device's location, which can be either precise or imprecise. How much information I collect depends on the type and settings of the device you use to access the Services. You can opt out either by refusing access to the information or by disabling Location permission on your device. However, if you choose to opt out, you may not be able to use certain aspects of the Services.

How do I process your information?

In Short: I process your information to provide, improve, and administer my Services, communicate with you, for security and fraud prevention, and to comply with law. I may also process your information for other purposes with your consent.

I process your personal information for a variety of reasons, depending on how you interact with my Services, including:

- To deliver and facilitate delivery of services to the user. I may process your information to provide you with the requested service.
- To protect my Services. I may process your information to keep my Services safe and secure, including fraud monitoring and prevention.
- To identify usage trends. I may process information about how you use my Services to better understand how they are being used so I can improve them.
- To save or protect an individual's vital interest. I may process your information when necessary to save or protect an individual's vital interest, such as to prevent harm.

What legal bases do I rely on to process your information?

In Short: I only process your personal information when I believe it is necessary and I have a valid legal reason (i.e., legal basis) to do so under applicable law, like with your consent, to comply with laws, to provide you with services to enter into or fulfill contractual obligations, to protect your rights, or to fulfill legitimate business interests.

If you are located in the EU or UK, this section applies to you.

The General Data Protection Regulation (GDPR) and UK GDPR require me to explain the valid legal bases I rely on in order to process your personal information. As such, I may rely on the following legal bases to process your personal information:

- Consent. I may process your information if you have given me permission (i.e., consent) to use your personal information for a specific purpose. You can withdraw your consent at any time.
- Performance of a Contract. I may process your personal information when I believe it is necessary to fulfill my contractual obligations to you, including providing my Services or at your request prior to entering into a contract with you.
- Legitimate Interests. I may process your information when I believe it is reasonably necessary to achieve legitimate business interests and those interests do not outweigh your interests and fundamental rights and freedoms. For example, I may process your personal information for some of the purposes described in order to:
 - Analyze how my Services are used so I can improve them to engage and retain users
 - Diagnose problems and/or prevent fraudulent activities
- Legal Obligations. I may process your information where I believe it is necessary for compliance with legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend my legal rights, or disclose your information as evidence in litigation in which I am involved.
- Vital Interests. I may process your information where I believe it is necessary to protect your vital interests or the vital interests of a third party, such as situations involving potential threats to the safety of any person.

If you are located in Canada, this section applies to you.

I may process your information if you have given me specific permission (i.e., express consent) to use your personal information for a specific purpose, or in situations where your permission can be inferred (i.e., implied consent). You can withdraw your consent at any time.

In some exceptional cases, I may be legally permitted under applicable law to process your information without your consent, including, for example:

- If collection is clearly in the interests of an individual and consent cannot be obtained in a timely way
- For investigations and fraud detection and prevention
- For business transactions provided certain conditions are met
- If it is contained in a witness statement and the collection is necessary to assess, process, or settle an insurance claim
- For identifying injured, ill, or deceased persons and communicating with next of kin
- If I have reasonable grounds to believe an individual has been, is, or may be victim of financial abuse
- If it is reasonable to expect collection and use with consent would compromise the availability or the accuracy of the information and the collection is reasonable for purposes related to investigating a breach of an agreement or a contravention of the laws of Canada or a province

- If disclosure is required to comply with a subpoena, warrant, court order, or rules of the court relating to the production of records
- If it was produced by an individual in the course of their employment, business, or profession and the collection is consistent with the purposes for which the information was produced
- If the collection is solely for journalistic, artistic, or literary purposes
- If the information is publicly available and is specified by the regulations

When and with whom do I share your personal information?

In Short: I may share information in specific situations described in this section and/or with the following third parties.

I may need to share your personal information in the following situations:

- *Business Transfers.* I may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of my business to another company.
- *When I use Google Maps Platform APIs.* I may share your information with certain Google Maps Platform APIs (e.g., Google Maps API, Places API). I obtain and store on your device ("cache") your location.
- *Vendors and Other Third-Party Service Providers.* I may share your information with third-party vendors or service providers to offer you certain products or services. Examples include: payment processing and hosting services

Cookies

Cookies are files with a small amount of data that are commonly used as anonymous unique identifiers. These are sent to your browser from the websites that you visit and are stored on your device's internal memory.

This Service does not use these "cookies" explicitly. However, the app may use third-party code and libraries that use "cookies" to collect information and improve their services. You have the option to either accept or refuse these cookies and know when a cookie is being sent to your device. If you choose to refuse cookies, you may not be able to use some portions of this Service.

Security

In Short: I aim to protect your personal information through a system of organizational and technical security measures.

I have implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal information I process. However,

despite safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so I cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat security and improperly collect, access, steal, or modify your information. Although I will do my best to protect your personal information, transmission of personal information to and from my Services is at your own risk. You should only access the Services within a secure environment.

Links to Other Sites

This Service may contain links to other sites. If you click on a third-party link, you will be directed to that site. Note that these external sites are not operated by me. Therefore, I strongly advise you to review the Privacy Policy of these websites. I have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

Children's Privacy

These Services do not address anyone under the age of 16. Individuals under the age of 16 may use this Application only with the assistance, consent, and supervision of a parent or legal guardian. I strongly encourage parents or guardians to actively participate in their child's online activities and provide guidance on the use of my Application. As the parent or legal guardian, it is your responsibility to ensure that the minor's privacy is protected and that they understand and comply with my privacy practices. If you become aware that your child has provided personal information to me without your consent, please contact me immediately so that I can take appropriate action to remove such information.

Changes to This Privacy Policy

I may update this Privacy Policy from time to time. Thus, you are advised to review this page periodically for any changes. I will notify you of any changes by posting the new Privacy Policy on this page.

This policy is effective as of 2024-02-09

Contact Us

If you have any questions or suggestions about my Privacy Policy, do not hesitate to contact me at contact@auroracompass.com.