## Privacy Policy of **Unisecs**

This Application collects some Personal Data from its Users.

This document can be printed for reference by using the print command in the settings of any browser.

## **Policy summary**

# Personal Data processed for the following purposes and using the following services:

## Beta Testing

## ■ TestFlight

Personal Data: app information; device information; email address; first name; last name; phone number; username; various types of Data as specified in the privacy policy of the service

## o Content performance and features testing (A/B testing)

## § Firebase Remote Config

Personal Data: various types of Data as specified in the privacy policy of the service

## Data transfer outside the EU

## Data transfer abroad based on standard contractual clauses

Personal Data: various types of Data

## o Device permissions for Personal Data access

## § Device permissions for Personal Data access

Personal Data: Calendar permission; Camera permission; Photo Library permission; Reminders permission

## Handling payments

## Apple Pay

Personal Data: billing address; email address; first name; last name; payment info; phone number; shipping address; various types of Data as specified in the privacy policy of the service

## ■ Payments processed via the Apple App Store

Personal Data: billing address; device information; email address; first name; last name; password; payment info; phone number; username

## ■ RevenueCat

Personal Data: Application opens; device information; Trackers; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); Usage Data; User ID

## ■ Payments processed via the Google Play Store

Personal Data: billing address; device information; email address; first name; last name; payment info; phone number

## o Hosting and backend infrastructure

## § Firebase Cloud Functions, Firebase Cloud Firestore and Firebase Cloud Storage

Personal Data: Usage Data; various types of Data as specified in the privacy policy of the service

## § Firebase Hosting

Personal Data: various types of Data as specified in the privacy policy of the service

## o Platform services and hosting

## ■ App Store Connect

Personal Data: diagnostics; Universally unique identifier (UUID); User ID

## Registration and authentication

## § Firebase Authentication

Personal Data: email address; first name; last name; password; phone number; profile picture; social media accounts; username

## § Direct registration and profiling

Personal Data: country; date of birth; email address; first name; gender; language; last name; password; username; various types of Data § Google OAuth

Personal Data: various types of Data as specified in the privacy policy of the service

§ Gmail permissions to access User Data (OAuth addition)

Personal Data: Insert and import; Read metadata; Read only access

## Registration and authentication provided directly by this Application

## Direct registration

Personal Data: date of birth; email address; first name; gender; language; last name; password; phone number; picture; Usage Data; username; various types of Data

## **Contact information**

Owner and Data Controller

Finn Borchers Ursula-Greve-Weg 9 30900 Wedemark Germany

Owner contact email: app. unisecs@gmail.com

## Full policy

## **Owner and Data Controller**

Finn Borchers Ursula-Greve-Weg 9 30900 Wedemark Germany

Owner contact email: app.unisecs@gmail.com

## Types of Data collected

Among the types of Personal Data that this Application collects, by itself or through third parties, there are: first name; last name; phone number; email address; username; password; profile picture; social media accounts; Usage Data; payment info; billing address; shipping address; diagnostics; User ID; Universally unique identifier (UUID); device information; app information; various types of Data; Calendar permission; Camera permission; Reminders permission; Photo Library permission; gender; date of birth; country; language; Read only access; Read metadata; Insert and import; picture; Application opens; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); Trackers.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using this Application.

Unless specified otherwise, all Data requested by this Application is mandatory and failure to provide this Data may make it impossible for this Application to provide its services. In cases where this Application specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner. Any use of Cookies – or of other tracking tools — by this Application or by the owners of third-party services used by this Application serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document.

Users are responsible for any third-party Personal Data obtained, published or shared through this Application.

## Mode and place of processing the Data

## Methods of processing

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of this Application (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

#### **Place**

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

#### **Retention time**

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

## The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following: Registration and authentication, Hosting and backend infrastructure, Content performance and features testing (A/B testing), Handling payments, Platform services and hosting, Beta Testing, Data transfer outside the EU, Device permissions for Personal Data access and Registration and authentication provided directly by this Application.

For specific information about the Personal Data used for each purpose, the User may refer to the section "Detailed information on the processing of Personal Data".

## **Device permissions for Personal Data access**

Depending on the User's specific device, this Application may request certain permissions that allow it to access the User's device Data as described below.

By default, these permissions must be granted by the User before the respective information can be accessed. Once the permission has been given, it can be revoked by the User at any time. In order to

revoke these permissions, Users may refer to the device settings or contact the Owner for support at the contact details provided in the present document.

The exact procedure for controlling app permissions may be dependent on the User's device and software.

Please note that the revoking of such permissions might impact the proper functioning of this Application.

If User grants any of the permissions listed below, the respective Personal Data may be processed (i.e accessed to, modified or removed) by this Application.

## Calendar permission

Used for accessing the calendar on the User's device, including the reading, adding and removing of entries.

## Camera permission

Used for accessing the camera or capturing images and video from the device.

## **Photo Library permission**

Allows access to the User's Photo Library.

## Reminders permission

Used for accessing the Reminders app on the User's device, including the reading, adding and removing of entries.

## **Detailed information on the processing of Personal Data**

Personal Data is collected for the following purposes and using the following services:

## Beta Testing

This type of service makes it possible to manage User access to this Application, or parts of it, for the purpose of testing a certain feature or the entire Application.

The service provider may automatically collect data related to crashes and statistics related to the User's use of this Application in a personally identifiable form.

## TestFlight (Apple Inc.)

TestFlight is a beta testing service provided by Apple Inc.

Personal Data processed: app information; device information; email address; first name; last name; phone number; username; various types of Data as specified in the privacy policy of the service.

Place of processing: United States – <u>Privacy Policy</u>.

## Content performance and features testing (A/B testing)

The services contained in this section allow the Owner to track and analyze the User response concerning web traffic or behavior regarding changes to the structure, text or any other component of this Application.

## **Firebase Remote Config**

Firebase Remote Config is an A/B testing and configuration service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States – <u>Privacy Policy</u>; Ireland – <u>Privacy Policy</u>.

## Device permissions for Personal Data access

This Application requests certain permissions from Users that allow it to access the User's device Data as described below.

## **Device permissions for Personal Data access (this Application)**

This Application requests certain permissions from Users that allow it to access the User's device Data as summarized here and described within this document.

Personal Data processed: Calendar permission; Camera permission; Photo Library permission; Reminders permission.

## · Handling payments

Unless otherwise specified, this Application processes any payments by credit card, bank transfer or other means via external payment service providers. In general and unless where otherwise stated, Users are requested to provide their payment details and personal information directly to such payment service providers. This Application isn't involved in the collection and processing of such information: instead, it will only receive a notification by the relevant payment service provider as to whether payment has been successfully completed.

## Apple Pay (Apple Inc.)

Apple Pay is a payment service provided by Apple Inc., which allows Users to make payments using their mobile phones.

Personal Data processed: billing address; email address; first name; last name; payment info; phone number; shipping address; various types of Data as specified in the privacy policy of the service.

Place of processing: United States - Privacy Policy.

## Payments processed via the Apple App Store (Apple Inc.)

This Application uses a payment service provided by Apple Inc. that allows the Owner to offer the purchase of the app itself or in-app purchases.

Personal Data processed to complete the purchases are processed by Apple, as described in the <u>privacy policy for the App Store</u>.

Personal Data processed: billing address; device information; email address; first name; last name; password; payment info; phone number; username.

Place of processing: United States - Privacy Policy.

## RevenueCat (RevenueCat, Inc.)

RevenueCat is a payment service provided by RevenueCat, Inc. The service allows the Owner to monitor and analyze the User and their purchase history and can be used to keep track of User behavior.

Personal Data processed: Application opens; device information; Trackers; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); Usage Data; User ID

Place of processing: United States - Privacy Policy - Opt Out.

## Payments processed via the Google Play Store

This Application uses a payment service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows the Owner to offer the purchase of the app itself or in-app purchases.

Personal Data processed to complete the purchases are processed by Google, as described in the <u>privacy policy for the Google Play store</u>.

Personal Data processed: billing address; device information; email address; first name; last name; payment info; phone number.

Place of processing: United States – <u>Privacy Policy</u>; Ireland – <u>Privacy Policy</u>.

## Hosting and backend infrastructure

This type of service has the purpose of hosting Data and files that enable this Application to run and be distributed as well as to provide a ready-made infrastructure to run specific features or parts of this Application.

Some services among those listed below, if any, may work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

#### **Firebase Cloud Functions**

Firebase Cloud Functions is a hosting and backend service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing. Personal Data processed: Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: United States - Privacy Policy; United States - Privacy Policy.

#### **Firebase Cloud Firestore**

Firebase Cloud Firestore is a hosting and backend service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing. Personal Data processed: Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: United States - Privacy Policy; United States - Privacy Policy.

## **Firebase Cloud Storage**

Firebase Cloud Storage is a hosting service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing.

Personal Data processed: Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: United States - Privacy Policy; United States - Privacy Policy.

## **Firebase Hosting**

Firebase Hosting is a hosting service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States - Privacy Policy; Ireland - Privacy Policy.

- Platform services and hosting
- Registration and authentication
  - Registration and authentication provided directly by this Application

## **Further Information for Users**

## Legal basis of processing

The Owner may process Personal Data relating to Users if one of the following applies:

- · Users have given their consent for one or more specific purposes.
- · provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- · processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

## Further information about retention time

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to fulfil a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right of access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

## The rights of Users based on the General Data Protection Regulation (GDPR)

Users may exercise certain rights regarding their Data processed by the Owner. In particular, Users have the right to do the following, to the extent permitted by law:

- Withdraw their consent at any time. Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- **Object to processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent.
- Access their Data. Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- Verify and seek rectification. Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- Restrict the processing of their Data. Users have the right to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- Have their Personal Data deleted or otherwise removed. Users have the right to obtain the erasure of their Data from the Owner.
- Receive their Data and have it transferred to another controller. Users have the
  right to receive their Data in a structured, commonly used and machine readable
  format and, if technically feasible, to have it transmitted to another controller without
  any hindrance.
- **Lodge a complaint.** Users have the right to bring a claim before their competent data protection authority.

Users are also entitled to learn about the legal basis for Data transfers abroad including to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data. **Details about the right to object to processing** 

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time, free of charge and without providing any justification. Where the User objects to processing for direct marketing purposes, the Personal Data will no longer be processed for such purposes. To learn whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

## How to exercise these rights

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. Such requests are free of charge and will be answered by the Owner as early as possible and always within one month, providing Users with the information required by law. Any rectification or erasure of Personal Data or restriction of processing will be communicated by the Owner to each recipient, if any, to whom the Personal Data has been disclosed unless this proves impossible or involves disproportionate effort. At the Users' request, the Owner will inform them about those recipients.

## **Transfer of Personal Data outside of the European Union**

## Data transfer abroad based on standard contractual clauses

If this is the legal basis, the transfer of Personal Data from the EU to third countries is carried out by the Owner according to "standard contractual clauses" provided by the European Commission. This means that Data recipients have committed to process Personal Data in compliance with the data protection standards set forth by EU data protection legislation. For further information, Users are requested to contact the Owner through the contact details provided in the present document.

## Additional information about Data collection and processing

## Legal action

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of this Application or the related Services. The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

#### Additional information about User's Personal Data

In addition to the information contained in this privacy policy, this Application may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

## System logs and maintenance

For operation and maintenance purposes, this Application and any third-party services may collect files that record interaction with this Application (System logs) or use other Personal Data (such as the IP Address) for this purpose.

## Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

## Changes to this privacy policy

The Owner reserves the right to make changes to this privacy policy at any time by notifying its Users on this page and possibly within this Application and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User's consent, the Owner shall collect new consent from the User, where required.

## **Definitions and legal references**

Personal Data (or Data)

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

#### **Usage Data**

Information collected automatically through this Application (or third-party services employed in this Application), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Application, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

#### Usei

The individual using this Application who, unless otherwise specified, coincides with the Data Subject.

## **Data Subject**

The natural person to whom the Personal Data refers.

## **Data Processor (or Processor)**

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

#### **Data Controller (or Owner)**

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of this Application. The Data Controller, unless otherwise specified, is the Owner of this Application.

## **This Application**

The means by which the Personal Data of the User is collected and processed.

## Service

The service provided by this Application as described in the relative terms (if available) and on this site/application.

## **European Union (or EU)**

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

## Read only access

Read all resources and their metadata—no write operations.

## Read metadata

Read resources metadata including labels, history records, and email message headers, but not the message body or attachments.

## **Insert and import**

Insert and import messages only.

#### Cookie

Cookies are Trackers consisting of small sets of data stored in the User's browser.

#### Tracker

Tracker indicates any technology - e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that enables the tracking of Users, for example by accessing or storing information on the User's device.

## **Legal information**

This privacy policy relates solely to this Application, if not stated otherwise within this document.

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