



ROAM B.V. PRIVACY POLICY

PREAMBLE

Welcome to '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);
- You download a mobile application belonging to one of our partners who, after obtaining your express opt-in consent to do so, 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**".

If you would like to obtain more information about whether a specific mobile application you have downloaded is a Partner App, please see our selected external third parties' list (also available at Appendix 1 of this Privacy Policy).

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.

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, the 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**") and other applicable privacy laws.

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
- By post at our registered office's address mentioned above.

3. WHAT DO WE DO?

Roam is a company 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.

Roam may only collect information about you from a Partner App which has obtained your prior and express consent for us to do so, either via our own Consent Management Platform ("CMP**") or through our publishers or developers' **CMPs**.**

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

Alternatively, **and only with your prior and express consent**, 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.

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 about an individual from which that person can be identified, whether directly or indirectly. 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 need be, as well as sending you information in relation to our Services.

Information related to End Users of Partners Apps:

If an End User uses a Partner App, **and only if you gave (via our own CMP or the publisher’s CMP) your prior express opt-in consent for third parties to do so**, we will collect the information listed below about your device. Alternatively, we may also receive such information directly via our trusted partners which are responsible to obtain your prior express consent to do so.

- **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 and share **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 could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of Users accessing a specific App feature. However, if we combine or co

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.

Information we never collect

Roam has never access to **information that can directly identify End Users** such as your name, surname, non-hashed email address, or phone number.

In addition, we do not collect any **Sensitive Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

A quick word about children

We do not and will not knowingly collect information from any unsupervised child under the age of 18. If you are under the age of 18, you may not use our Partner App unless you have the consent of, and are supervised by, a parent or guardian.

Please refer to the relevant Partner App's privacy policy for information about using a mobile application with a parent or guardian.

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. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. For more details about the meaning of such lawful grounds, please see section "**Lawful basis for processing**" at **Appendix 1 below**.

Information related to website users and Roam's clients:

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer/ provide our services	(a) Identity (b) Contact	Performance of a contract with you
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	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
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	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
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	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)

		(b) Necessary to comply with a legal obligation
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
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	Necessary for our legitimate interests (to develop our products/services and grow our business)
To comply with laws or to allow us to enforce the terms of these Principles. To respond to lawful requests and legal processes. To protect the rights and property of Roam, our agents, customers, and others. To protect the safety of our employees and agents, our Partners or any other person.	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)

Information related to End Users of Partners Apps:

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
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.	(a) Profile (b) Technical (c) Marketing and Communications	Opt-in Consent provided within our Partner App via our own CMP our trusted partners' CMP, enabling you to specifically opt-in to your personal data being shared with trusted third-parties.
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.	(a) Profile (b) Technical (c) Marketing and Communications	Opt-in Consent provided within our Partner App via our own CMP our trusted partners' CMP, enabling you to specifically opt-in to receiving targeted advertisement.

An important note on obtaining End Users Consent

We require that all our business partners based **within the European Union or processing personal data of European Union citizens** to get your **express opt-in consent** before they share your personal data with us or any third party for the purposes listed above.

Likewise, we do not use personal data belonging to End Users based within the European Union without having obtained appropriate contractual guarantees from our selected business partners that they have lawfully collected such personal data.

Opting out of receiving targeted advertising

We also require that our business partners send us up to date data. Therefore, if you have opted out of sharing your personal data with our partners at any time, we will be informed of such within a reasonable time and **we will delete your data as a result**.

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

Each End User can also **opt-out of the data collection by Roam directly by contacting us**. To do so, please send us an email at legal@roam.ai and submit your iOS® Identifier for Advertising (on iOS only), Android™ Advertiser ID (on Android only), and email. Opting out will not stop advertising from the Partner App integrating our SDK being sent to you by third party, but Roam will no longer be able to collect data from your mobile.

To learn more about targeted advertising or to opt-out of some types of targeted advertising for third-party ad networks, please visit the [Network Advertising Initiative](#) or the [Digital Advertising Alliance](#). Additionally, your mobile operating system (e.g. iOS or Android) should also give you the option to manage your advertising preferences (this may be found in the "Settings" tab of the relevant device).

6. 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.

7. INTERNAL TRANSFERS

Many of our External Third Parties are based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA (including to the United States) in connection with the above purposes.

Please be aware that countries which are outside the European Economic Area may not offer the same level of data protection as Netherlands, although our collection, storage and use of your personal data will continue to be governed by this Privacy Policy.

We require our business partners based within the European Union or processing personal data from European Union citizen to ask End Users to provide their consent to the storage, processing, and transfer of their personal data in and to countries outside the EEA. We do this by requesting their consent to these practices in the “pop-up” notice that is displayed to them when they first use a Partner App containing the Roam Product.

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

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 **section 2 “Your legal rights”** at **Appendix 1** below for further information.

In other circumstances, when we have anonymized 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:

- the right to ask us to provide you with copies of personal information that we hold about you;
- the right to ask us to update, correct or erase any out-of-date or incorrect personal information that we hold about you free of charge;
- the right to request the transfer of your personal data to you or to a third party;
- the right to opt out of any marketing communications that we (or any third party to whom we have disclosed your personal information with your consent) may send you;
- The right to withdraw consent at any time where we are relying on consent to process your personal data.

Please see **section 2 “Your legal rights”** at **Appendix 1** below for further information about your legal rights.

If you wish to exercise any of the rights listed above, please contact Roam's DPO by any of the following means:

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- 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 try to respond to all legitimate requests within **one month**. Occasionally it could take us longer than a month 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: DATA PROTECTION GLOSSARY

1. LAWFUL BASIS FOR PROCESSING

- **CONSENT** means processing your personal data in relation to which your prior express, specific consent has been given either directly to us via our Consent Management Platform, or to our business partners via their own Consent Management Platforms.
- **COMPLY WITH A LEGAL OBLIGATION** means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.
- **LEGITIMATE INTEREST** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- **PERFORMANCE OF CONTRACT** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

2. YOUR LEGAL RIGHTS

You have the right to:

- Request **access** to your personal data (commonly known as a “**data subject access request**”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request **correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request **erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request the **transfer** of your personal data to you or to a third party. We will provide you, or a third party of your choice, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain

products or services to you. We will advise you if this is the case at the time you withdraw your consent.

3. **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 the Netherlands, 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:** With your express opt-in consent, 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:** With your express opt-in consent, 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.

Roam thrives at being completely transparent with you. To this effect, please see our **list of the selected external third parties** we may share your data with for the purposes indicated in this Privacy Policy.