

# GeoWatch Labs Privacy Policy

The GeoWatch Labs Privacy Policy is applicable to this mobile application (hereinafter the “App”) by the natural person registered on the App (hereinafter referred to as the “User”).

This App is developed and made available on iOS and Android by **GeoWatch Labs SAS**, a company organized under the laws of France, registered to the RCS PARIS under the n°888 976 479, with corporate headquarters at 29 rue Taitbout, 75009 Paris,, France (hereinafter “GEOWATCH”).

From the registration by the User on the App, some personal data may be processed by GEOWATCH. A “Personal Data” refers to any information relating to a directly or indirectly identified or identifiable natural person. GEOWATCH undertakes to ensure the processing of Personal Data is carried out in compliance with the Privacy Policy herein.

## **ARTICLE 1 - SCOPE OF THE PRIVACY POLICY**

GEOWATCH applies the European standards in terms of data protection, and ensures any processing is carried out in compliance with the REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, (hereinafter the “GDPR”), and meets the standards of any other law directly applicable to the use of the App (hereinafter the “Applicable Law”).

GEOWATCH shall not be responsible nor liable for the Personal Data collected by any third party in relation to the User’s device used to access the App, nor the stores used to download, install and update the App.

## **ARTICLE 2 - ACKNOWLEDGEMENT OF THE PRIVACY POLICY**

By clicking on the “*I accept the GeoWatch Labs Conditions of Use and Privacy Policy*” and completing the registration process, the User represent that they have read, understand, and acknowledge the Privacy Policy.

GEOWATCH shall be entitled to make changes to this Privacy Policy at any time and for any reason, without notice. The User is advised to periodically review this Privacy Policy to stay informed of updates.

Changes to this Privacy Policy come into force on the date of their publication on the App. The continued use of the App after the date of the publication of the updated Privacy Policy shall mean the User is aware of the changes, understands and agrees with the terms of the new Privacy Policy.

## **ARTICLE 3 - DESCRIPTION OF PROCESSING**

### **3.1 Categories of data collected**

The categories of Personal Data processed are:

- Identification data (fullname);
- Contact information (phone number, email address, postal address);
- Geolocation data, and
- Pictures metadata (random token associated to the account, location, gyroscope of the device used).

### **3.2 Use of Personal Data collected**

GEOWATCH only processes Personal Data necessary to fulfil the purposes of the processing hereafter defined, and keeps such data for a duration relevant to the purposes of the processing.

Purposes	Data collected	Data retention period
<b>Management of the User’s account (creation, registration, reward)</b>	Identification data, Contact information	Deleted upon the deletion of the User account
<b>Allow the User to open their device’s camera and contribute to a mission located in a certain area</b>	Geolocation data	Not stored – processed depending on the access granted via the device’s settings. Should the User wish to change the authorization to access such data, they may do so in their device’s settings.
<b>Validation of the contributions according to the criteria of the mission</b>	Pictures metadata	Anonymized after the deletion of the User account



<b>Contact the winner of a mission to grant the reward</b>	Contact information	Deleted upon the deletion of the User account
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All the processing hereabove mentioned are necessary to perform the GeoWatch Labs Conditions of Use available in the Account settings (herein after the "GCU") governing the relationship between GEOWATCH and the User in relation to the App.

Should the User decide to contact GEOWATCH for any questions, complaints or claims with respect to the App, their contact information and the content of their message will be processed by GEOWATCH so they can provide an answer to the User's request. Such Personal Data will be stored for one (1) year after the last contact between the User and GEOWATCH. Said processing is based on the User's consent to the processing of their Personal Data, that they can withdraw at any time. In case of withdrawal, the User is informed GEOWATCH may not be able to process the User's requests and shall not be held liable for any lack of answer to said requests.

GEOWATCH shall be free to preserve certain Personal Data in a confidential manner as archives with limited access for up to six (6) years after the User's last contact with GEOWATCH, based on GEOWATCH's legitimate interest to preserve such information in order to assert a right or a contractual relationship.

### 3.3 Personal Data recipients

GEOWATCH is entitled to disclose the User's Personal Data to any third party in charge of the performance of all or part of the processing in relation to the App. GEOWATCH may share Personal Data to its subcontractors, performing the following services on behalf of GEOWATCH:

- Management of the User's account: Firebase
- Hosting of the pictures: Google Cloud Storage
- Pictures' verification process: Google Kubernetes Engine

GEOWATCH shall ensure their subcontractor is implementing appropriate organization and technical measures with regard to Applicable Law.

Further, under certain circumstances, GEOWATCH may be required and shall be entitled to disclose certain Personal Data: (i) To comply with applicable law, regulation, legal process, court order or other mandatory disclosure; or (ii) To protect the rights, property and safety of the App, and/or User.

## **ARTICLE 4 - SECURITY OF PERSONAL DATA**

GEOWATCH shall take all necessary measures to preserve the security and confidentiality of the Personal Data, and in particular, to prevent them from being damaged or accessed by unauthorized third parties.

## **ARTICLE 5 - MINOR PROTECTION**

The App does not address users below the legal age of majority.

Upon acceptance of the GCU and Privacy Policy at first registration on the App, the User represent they are above the legal age of majority of their country. As a consequence, GEOWATCH does not knowingly collect minors' Personal Data, and cannot be held liable for such collection.

Should a legal representative of a minor be aware GEOWATCH been provided with this minor's Personal Data, they shall contact GEOWATCH that will take the necessary steps to put an end to the processing of these Personal Data.

## **ARTICLE 6 - DATA SUBJECT RIGHTS**

### 6.1 The User rights over their Personal Data

The User has a right to be informed regarding the processing of their Personal Data. They also have a right to access, rectify, erase and obtain a copy of their Personal Data. In certain circumstances, the User can also object to the processing of all or part of the processing of their Personal Data.

Should a processing be based on the User's consent, they have the right to withdraw said consent.

The User can contact GEOWATCH for more information regarding the processing of their Personal Data. The User is also informed that, should they consider the answer GEOWATCH provided to their request unsatisfactory, they have the right to lodge a complaint with the supervisory authority of their country.

### 6.2 How the User can exercise their rights

For any question regarding the processing of their Personal Data or to exercise their rights over their Personal Data, the User can contact GEOWATCH via the following contact information:



**Postal address**

*29 rue Taitbout, 75009 Paris, France*

**Email address**

[contact@geowatch-labs.com](mailto:contact@geowatch-labs.com)

**ARTICLE 7 - CHOICE OF LANGUAGE**

The User expressly agrees that the contractual language applicable to the Privacy Policy and enforceable between the Parties is English. Any other version of the Privacy Policy is provided for information purposes only and proposed solely for the User's convenience.

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