

Our position on privacy

At Your Digital Innovation, we take your right to privacy seriously. We also believe that you should have a clear understanding of the principles which guide our Privacy Policy. Therefore, we have developed our “4+4 Privacy Principles” to highlight your rights and our responsibilities when it comes to protecting your privacy.

Your Rights

- You have the right for your private data to be just that, private.
- You have the right to a clear understanding of our privacy policy, and to request clarification when in doubt.
- You have the right to clear and easy-to-use privacy settings, with the ability to turn features on and off at the click of a button.
- You can delete your content and profile.

Our Responsibilities

- We don't upload numbers for using the communication service from your phone
- We promise not to share personally identifiable information (PII) with anyone without your express permission.
- We promise to be careful and responsible with the data you have provided us, and to take utmost care in protecting it.
- We promise to clearly communicate any changes to our privacy policy

Privacy Policy

Last Updated: 04th September, 2018

Our Commitment to Your Privacy

The joinsmart.city website and services made available from Your Digital Innovation GmbH and operated by Your Digital Innovation GmbH ("**Your Digital Innovation**," "**we**," "**our**," or "**us**"). At Your Digital Innovation, we understand that you value your privacy, and we want to help make your experience with our website and services (referred to in this policy collectively as our "**Services**") satisfying and safe. This policy describes our collection of information, including personal information, in connection with our Services, and explains how we use and disclose this information. To make this policy easy to find, we make it available from our homepage.

Personal Information We Collect and How We Use It

New Communication & Interaction Service handles carefully your data

Communication - we get phonebook numbers, send to server pseudo data (so impossible to trace which numbers user has in phonebook), match data against people on server and connect people locally in app, so no data from phonebook is sent to server. From user we just have phone number and all posts he made in chats. If user requests to delete all his data on server, this will be enabled. User can at any time delete his profile with deleting all apps.

Content - we have user email, which is confirmed. No other data is used from user. We send encrypted phone number with mobile app request to check if user has installed app, but phone number is anonymized and stored in server in anonymous way. From user we have also name and picture (if he uses picture). User can delete the profile.

"**Personal information**," as used in this policy, is information that may be used to identify an individual, such as a person's name, address, or email address. We collect personal information in the course of providing our Services to you and you may also make personal information available to others as you use the Services. Below are some examples of the types of personal information we collect and the ways in which we use it:

- **Information you provide.** We collect personal information that users provide through optional, voluntary submissions, such as information that you provide to us at the time of registering for our Services, such as name, date of birth (just to check if you are over 14 years old in order to use service) and wireless telephone number; the contents of messages that you may transmit to other users of the Services through use of messaging functionality on the Services; other information that you voluntarily provide in the course of participating in City Topics on our Services, such as photos and other content that you upload or otherwise provide to existing City Topics, descriptions of City Topics that you create, and other information that you may include in your user profile on the Services; and search queries that you execute on our Services.

You may also provide personal information to us in other ways, such as by requesting user support. We use personal information we collect to respond to your inquiry or request, to provide, improve, and develop our Services, to tailor your user experience, to prevent or investigate fraudulent or inappropriate usage of our Services, for research and development, and for the other purposes described in this policy. Depending on your account settings, certain other information you provide may be available to other users, including both registered and unregistered users of the Services.

- **Our registration process.** From joinsmart.city you are linked to your city. You may browse City Topics, content uploaded by other users, and other content on the Services without registering. In order to participate in City Topics or to create new City Topics, to save City Topics to your favorites, to vote on City Topics, to comment on City Topics, or to forward City Topics to third parties, or to use certain other features of the Services, you must register for our Services. When you register for our Services, we request certain personal information about you, such as your first and last name, date of birth (just to check if you are over 14 years old in order to use service) and wireless phone number.
 - **Registration SMS / text message** - When you register for our Service, we will send a verification message to the wireless phone number that you provide at the time of registration. We require you to confirm your wireless phone number by entering the confirmation code sent to your wireless telephone number on the joinsmart.city app. We use this verification process to prevent fraud. **Your carrier's message and data rates may apply to your receipt of our registration SMS / text message. All charges are billed by and payable to your mobile service operator.** We will not send you any SMS / text messages other than this confirmation message.

Once you have registered for our Services, and have confirmed your wireless phone number and your email address, you can join City Topics and may participate in them by uploading content, voting for your favourite content, making comments, and forwarding links to your friends and contacts. Additionally, once you have registered for our Services and have confirmed your wireless phone number and email address, you may view and update your profile on our Services, and update your privacy and communications settings.

Non-Personal Information We Collect and How We Use It We may also collect information that is not personally identifiable, and may aggregate personal information or otherwise render it anonymous (that is, non-personally identifiable). We may use non-personally identifiable information we collect to operate our network; to provide, improve, and develop our Services; to customize advertisements and other content that may be displayed on our Services, and otherwise to tailor your user experience; to prevent or investigate fraudulent or inappropriate usage of our Services, for research and development; and for the other purposes described in this policy. We may use this anonymous information for various purposes and may share it with third parties. Below are some examples of the types of non-personal information we collect and some specific examples of how we use this information:

- **Aggregated data.** We may aggregate personally identifiable information about our users to create non-personally identifiable information. For example, we may aggregate our registration information to obtain the number of users who reside in a particular zip code, or the proportion of our

users who are male or female. We may share this aggregated, non-personal information with third parties.

- **Usage tracking.** We may collect non-personal information from your use of our Services. For example, we may collect information about user traffic and usage patterns throughout our site, and similar information regarding the use of our Services. We may also track click-through information, such as IP addresses, from the messages we send to our users. We use the information we collect in these manners to, for example, improve our Services, to develop new products and services, to gauge the effectiveness of our marketing campaigns, to discourage and address abusive and fraudulent use of our Services, and to help our users with troubleshooting issues.
- **Methods of collection.** We collect non-personal information passively using technologies such as standard server logs, cookies, and clear GIFs (also known as "Web beacons"). When you visit our site or use our Services, we or our advertisers may send one or more cookies - a small file containing a string of characters - to your computer that uniquely identifies your browser or recognizes a cookie that is already on your machine. We use cookies to improve the quality of our Service by storing user preferences and tracking user trends, and to customize your experience. Most browsers are initially set up to accept cookies, but you can reset your browser to refuse all cookies or to indicate when a cookie is being sent. However, some Services may not function properly if your cookies are disabled. Also, please be aware that third parties may set cookies on your hard drive or use other means of passively collecting information about your use of their services or content. We do not have access to, or control over, these third-party means of passive data collection.

If we directly combine any non-personal information gathered through passive means with personal information, we treat the combined information as personal information under this policy. Otherwise, we use information collected by passive means in aggregated or other non-personally identifiable forms.

Children

Consistent with the federal Children's Online Privacy Protection Act of 1998 (COPPA), we will never knowingly request personally identifiable information from anyone under the age of 14 without requiring parental consent. Any person who provides his or her personal information to us through our Services represents that he or she is older than 13 years of age.

Disclosure of Personal and Other Information

We may share personal information with third parties (including regulatory or law enforcement authorities) in order to carry out a user's request or if we believe that doing so is legally required or is in our interest to protect our property or other legal

rights (including, but not limited to, enforcement of our agreements), or the rights or property of others.

Additionally, some third-party sponsors of City Topics on the Services may offer prizes to some participants in City Topics that they sponsor. If they do, we will provide them with the names and addresses of our users who have won prizes so the third-party sponsors may fulfill the prizes. When you participate in communicated competitions you accept that you can win. We require those sponsors to only use such information for the purpose of prize fulfillment.

If you post any of your information to a public area of our Services, please be aware that it is no longer "personal information" for the purposes of this policy, and we or anyone else may use such information without restriction. If you provide access to personal or other information to a limited set of other users through any of our privacy controls or other settings, please understand that Your Digital Innovation has no control over how others may collect, use, or disclose such information.

Our Commitment to Data Security

In an effort to prevent unauthorized access, maintain data accuracy, and ensure the correct use of information, we have put in place physical, electronic, and managerial procedures to safeguard and secure the information we collect online. Please be aware, however, that no data transmission of City Topics over the Internet or other networks can be guaranteed to be 100% secure. Consequently, we cannot ensure or warrant the security or integrity of any information you transmit to us. You transmit information to us at your own risk. Once we receive personal information, we make reasonable efforts to protect it from unauthorized access, disclosure, alteration, or destruction. But we cannot represent or guarantee that personal information will not be accessed, disclosed, altered, or destroyed.

If Your Digital Innovation learns of a security systems breach we may attempt to notify you electronically so that you can take appropriate protective steps. Your Digital Innovation may post a notice through the Services if a security breach occurs. If this happens, you will need a web browser enabling you to access the Services. Your Digital Innovation may also send an email to you at the email address you have provided to us in these circumstances. Depending on where you live, you may have a legal right to receive notice of a security breach in writing.

Third-Party Sites, Software, and Services

Our Services may contain links to and interoperate with third-party sites, software, and services. Any links to or interoperability with third-party sites, software, or services are provided for your convenience only, and we do not have control over the content or privacy and security practices and policies of such third parties. Any personal information that you provide to any other third party is subject to that third

party's privacy practices and policies, not this policy. We encourage you to learn about their privacy and security practices and policies before providing them with personal information.

Business Transfers

Information about our users, including personal information, may be disclosed as part of any merger, acquisition, debt financing, sale of company assets, or similar transaction, as well as in the unlikely event of an insolvency, bankruptcy, or receivership in which personal information would be transferred as one of our business assets.

International Visitors

The Services are hosted in and provided from within the European Union. If you use our Services from the European Union, by providing your personal information, you consent to the transfer of your personal data to the European Union and the use of your personal information, in accordance with this policy.

Information Retention and Disposal

We may retain personal information for as long as we have a business need for it or as applicable laws or regulations or government orders require us to retain it. Additionally, the Services may enable you (or other users) to save information including information that you have made public or allowed certain users to access or see.

Changes and Updates

We may occasionally update this policy. When we do, we will also revise the "last updated" date at the top of this policy. We encourage you to review this policy periodically to stay informed about our collection, use, and disclosure of personal information.

How to Contact Us

Should you have other questions or concerns about this privacy policy, please contact us using the following contact information:

Your Digital Innovation GmbH

Email: office@joinsmart.city