

PRIVACY POLICY FOR DATA PARTNERS

Last updated on: 30 June 2023

Deze privacy policy is momenteel enkel in het Engels beschikbaar. Wenst u een Nederlandstalige versie van deze privacy policy, gelieve dan contact op te nemen met privacy@accurat.ai.

Cette politique de confidentialité n'est actuellement disponible qu'en anglais. Si vous souhaitez recevoir une version française de cette politique de confidentialité, veuillez contacter privacy@accurat.ai.

This privacy policy ("**Privacy Policy**") is applicable to the processing activities of ACCURAT as data controller with regards to the personal data that are shared with us by third parties.

When you download a mobile application that belongs to one of our partners ("**data partner**") who share your personal data as set out in this Privacy Policy ("**your personal data**") with us, either collected by themselves or through an SDK provided by ACCURAT.

As we deeply care about your privacy and value transparency, we have prepared this little, but very important document to inform you (i) on how we receive, treat and store your personal data; (ii) the rights you can exercise in relation to your personal data; and (iii) the measures we take to protect it and to secure our Solution.

Please note that we may update this Privacy Policy in the future: the latest version can always be found on our website: <https://www.accurat.ai/> ("**Website**").

We always attempt to act in accordance with the applicable privacy legislation, such as (non-exhaustive): the European General Data Protection Regulation 2016/679 ("**GDPR**") and the Belgian Privacy Act of 30 July 2018 (including all future legislative changes and amendments made to the foregoing). Therefore we have appointed a **Data Protection Officer** ("**DPO**"), to support our commitment for a durable compliance with the applicable privacy legislation, who can be contacted at dpo@accurat.ai.

We may update this Privacy Policy by posting a new version on the Website whereby we will indicate the revision date. Thus, we strongly recommend to regularly consult the Website and the page displaying the Privacy Policy, to make sure that you are aware of any changes.



Quick recap: who are we?

We are ACCURAT, a private limited company ("*besloten vennootschap*") incorporated and existing under the laws of Belgium, with its registered office at 9800 Deinze, Leernsesteenweg 155, Belgium with VAT/company number BE- 0725.498.434 ("**ACCURAT**" or "**we**" | "**us**").

We are the provider of a location intelligence solution providing our customers with aggregated and anonymized customer insights to allow them to improve their services ("**Solution**").

In light of the GDPR, ACCURAT will act as the **CONTROLLER** of your personal data for the purposes described in this Privacy Policy. This means, we are in control of (and thus, responsible for) your personal data. But no worries, you retain certain rights over your personal data which you can exercise vis-à-vis ACCURAT (please see below).



Which personal data are we talking about?

We will traditionally collect and store the following information relating to you:

- ✓ Exact location (GPS signal data), such as latitude, longitude, altitude, speed, context, method, heading and accuracy of the location;
- ✓ User identifier: such as a unique identifier assigned by the data partner or a Mobile advertising identifiers such as Apple IDFA for iOS devices and Android Advertising ID for Android devices;
- ✓ Granted permissions and consent by you which allow the collection of your personal data;
- ✓ Information about the connected networks of your device (WiFi and mobile phone network name, IP Address);
- ✓ Information about the your device (make, model, version of the OS and app identifier);
- ✓ Timestamp of the collected data (time, hour, second, time zone).

Where we receive your personal data from a data partner that makes use of our SDK, we may collect and store information about your in-app activity and interactions.



How do we collect your personal data?

We receive your personal data through our data partners. Indeed, you (acknowledged to) provide us with your personal data when you downloaded a mobile application and agreed to share your personal data with us through:

- ✓ The application from a third party data partner that collect your personal data for statistical analysis and to share it with their data partners such as ACCURAT;
- ✓ An SDK provided by ACCURAT to our data partner that they have implemented in their respective application and who share your personal data with ACCURAT.

We do not knowingly collect information from children under the age of 13. Data is only collected by means of an explicit GDPR consent. Children under 13 providing their data should only do so with the consent of their parents.



It enables us to provide and improve our Solution

We always strive to keep our Solution top notch by providing our customers with actionable insights on a near-real-time basis. For this purpose we collect, store and use your personal data, to perform statistical analysis, to generate aggregated analytical reports, demographic prediction models, location behavioural models and to derive custom audience segment, including through profiling, by aggregating your personal data with the personal data of other data subjects.



You gave your consent and we keep you informed.

We will collect, store and use your personal for the purpose of providing our services, because you provided your consent to through our data partners (either directly or through our SDK) for us to do so. However, we will always make sure to:

- ✓ assess whether this is in proportion with the purpose for which your personal data was collected and used;
- ✓ provide you with all necessary and adequate information on how we receive your personal data to ensure a fair and transparent processing;
- ✓ provide you with the possibility to withdraw your consent at any time;
- ✓ take your reasonable expectations into account and ensure a balance with your fundamental rights and freedoms.

If we cannot guarantee this, we will stop storing | using your personal data or determine a new legal ground.



How long do we need your personal data?

Unless longer storage is legally required, we will use and store your personal data for as long as:

- ✓ the partnership between ACCURAT and the data partner that collected your personal exists and has not been terminated (meaning a partner agreement is in place). The personal data will be retained for another three years after the partnership has ended;
- ✓ you have not withdrawn your consent to the processing of your personal data either to our data partner or using our form for exercising your rights (please see below).



Security is important to us

We undertake to take reasonable, physical, technological and organisational precautions in order to avoid (i) unauthorised access to your personal information, and (ii) loss, abuse or alteration of your personal data.

ACCURAT has taken **technical, physical & organisational measures** to secure the physical facilities, computer software, databases and network environments used with the utmost care. This should ensure that your data and other information are protected. Although no method can offer 100% guarantee, ACCURAT will make every effort to take every possible practicable measure. ACCURAT shall on no account be held liable for any direct or indirect damage resulting from erroneous or unlawful use of user data by third parties.



It takes three to tango.

To ensure the proper functioning of our Solution and to continue improving it, we rely on the services of certain third parties to ensure that everything indeed goes according to plan. These third parties may receive your personal data if this is necessary for the performance of their task(s). The third parties involved are:

- ✓ **Software, hosting and cloud providers**
- ✓ **Data analysis providers**
- ✓ **Freelancers or other service providers**

Of course we have made sure that the necessary contracts or similar legal binding acts are in place to ensure that these third parties treat your personal data in accordance with applicable privacy legislation.

We do not provided our customers with your raw personal data unless for those you have given us your permission to use your data. ACCURAT therefor only provides customers with aggregated and anonymized insights through the Solution.

In addition, we might transfer your personal data:

- ✓ **To competent authorities:** for instance, because (i) we are obliged to provide your personal data under law or in the scope of (future) legal proceedings, or (ii) if this is necessary to safeguard our rights
- ✓ **In M&A context:** meaning, if ACCURAT or the majority of its assets, is taken over by a third party, in which case your personal data – which ACCURAT has collected – may be one of the transferred assets.

In case any of the above third parties | recipients are located in a country **outside the European Economic Area**, we will ensure that one or more of the listed EU-approved safeguards are in place

- ✓ **European Commission adequacy decision:**
- ✓ **Data transfer agreement** (cfr. the European Commission’s Standard Contractual Clauses)
- ✓ **Binding corporate rules**
- ✓ **Valid certification mechanisms**



Your privacy rights, your power:

You can at any time prevent your location from being shared by disabling the location services through the operating system of your mobile device.

- ✓ In iOS that is Settings > Privacy > Location Settings.
- ✓ In Android: Settings > Location.

As soon as you opt out of those settings, no more location data will be collected. You also can prevent your “mobile advertising identifier” from being shared.

- ✓ In iOS this is done by activating “Restrict Ads Tracking” in Settings > Privacy > Ads.
- ✓ In Android you can activate “Opt Out of Ads Personalization” in Settings > Google > Ads.

No more personal data will be collected from the moment you prevent this identifier from being shared. Please note that the methods described above may change.

The GDPR gives you certain rights over your personal data vis-à-vis ACCURAT. You can exercise these rights by contacting us, as specified below, by using the **form for exercising your rights here**.

- ✓ **Right to access:** you can ask us to give you copies of your personal data. We may charge you a small fee for this service.
- ✓ **Right to rectification:** you can ask us to correct | complete any information you believe is inaccurate | incomplete.
- ✓ **Right to erasure:** you can ask us to erase your personal data, under certain conditions.
- ✓ **Right to object:** You can object to us processing your personal data, under certain conditions.
- ✓ **Right to restrict processing:** you can ask us to restrict the processing of your personal data, under certain conditions.
- ✓ **Right to data portability:** you can ask us to transfer your personal data to another organization, or directly to you, under certain conditions.



Complaints | Your authorized supervisory authority

You are not satisfied with the manner in which we collect, store or otherwise treat or secure your personal data? We are sorry to hear that, and are prepared to take all measures to remedy this situation. Please do contact us as specified at the bottom of this Privacy Policy.

You also have the right to lodge a complaint with the authorized supervisory authority (the **Belgian Data Protection Authority**) should you consider that the processing of your personal data infringes applicable privacy legislation by sending an email to contact@apd-gba.be or any other email address provided by the authorized supervisory authority (<https://www.dataprotectionauthority.be/contact-us>).



How can you contact us?

We are always happy to hear from you! You can contact us via one the following channels:

- ✓ By email: privacy@accurat.ai
- ✓ Our DPO: dpo@accurat.ai
- ✓ By post at: 9800 Deinze, Leernsesteenweg 155, Belgium

