

## **Privacy Policy**

This TrackingFox Privacy Policy outlines the type of information TrackingFox may collect from data subjects who use this website and mobile application, the way their personal data is processed, the rights of data subjects and other relevant information.

By accepting this Privacy Policy, User agrees, that his personal data would be collected and processed to provide and improve the services on our website or mobile application. The processing of User's personal data take place in compliance with Regulation (EU) 2016/679 (hereinafter - General Data Protection Regulation) and provisions of relevant legislations.

### **Personal Data**

Any information that directly, indirectly, or in connection with other information - relates to an identified or identifiable natural person.

### **Data Subject**

Any natural person whose personal data is being collected, held, or processed.

### **Data Controller**

The company which determines the purposes and means of collecting and processing personal data of data subjects – TrackingFox registered trademark operated by MR Digital Group UAB, a company incorporated and existing under the laws of Lithuania, company no.: 303374967, address: Konstitucijos pr. 26, LT-08105, Vilnius, Lithuania.

### **Cloud**

The place in which any personal data is maintained, managed, backed up remotely and made available to Users over a network.

### **Purposes of processing User's Personal Data**

TrackingFox may collect, record, and analyze User's personal data to:

- operate, deliver, monitor, analyze and improve our products as well as the services on the website or mobile application;
- provide the security and stability of the services on the website or mobile application;
- provide User with notifications in order to show ads and customize other content for User;
- for identification of the User and to determine appropriate services while using account on the website or app.

TrackingFox may share User's personal data to the third parties only, if it is necessary for the following purposes:

- when TrackingFox uses service providers;
- due to a request from Law Enforcement or National authority.

TrackingFox may use third-party services for the purpose of facilitating payment and the completion of purchases, as well as, fulfilling, delivering orders, or providing customer services.

### **Personal data**

TrackingFox collects and process personal data that User provides us upon registration and while using our mobile application regarding the use of the services on the website or mobile application.

If User visits our website or mobile application, as well as uses our mobile application, TrackingFox collects the following data, which is necessary to display the website correctly and guarantee required stability, security, and appropriate services provision:

- IP-address;
- User's statistics - date and time stamp, time difference to GMT;
- Location, route, and travel information.

Furthermore, TrackingFox may collect and process any personal data that User voluntarily submits on the website or mobile application, such as:

- User's full name, address, zip code, city, region, country, phone number;
- User's email address, in order to receive information, updates and newsletters;
- User's payment information - credit card type, last four digits, expiration date; PayPal or other relevant account information; date of payment, currency, amount.

User's personal data will be processed only for the above identified purposes. TrackingFox shall perform only such actions of User's personal data processing that, are necessary to achieve the aforementioned purpose. Processing of User's personal data shall be based on necessity for the performance of a contract (article No. 6(1)(b) of the General Data Protection Regulation). Any other actions of processing of User's personal data shall be based on consent (article No. 6(1)(a) of the General Data Protection Regulation) or other legal basis established in the General Data Protection Regulation.

### **Personal data and the Cloud**

If User stores or processes any of personal data in the Cloud using TrackingFox services, User is considered as a data controller and agrees to take full responsibility for complying with the General Data Protection Regulation and for how personal data is handled, processed and stored in the Cloud and in such cases TrackingFox is not considered as the Data Controller or collector/processor of User's personal data and information disclosed hereto.

## **Safety of your Personal Data**

In order to secure User's personal data, TrackingFox apply the following safety measures: running firewall software, keeping our servers up to date with security patches, preventing access to the Personal Data from the outside and taking other necessary measures to keep the personal data secure. However, TrackingFox cannot guarantee non-disclosure of personal information, due to factors beyond our control. Therefore, if the personal data is in the Cloud TrackingFox cannot be responsible for third parties as service providers. If User believes that his account has been hacked and any of his personal data has been disclosed, User must contact us as soon as possible.

## **Keeping User's Personal Data**

TrackingFox will keep excessive personal information for 10 (ten) days, for the purpose of completing additional task necessary for additional task completion. Remaining information, necessary for conclusion of services shall be stored as indicated previously.

## **Cookies**

Cookies are small pieces of information sent by a website to a User's hard disk. TrackingFox uses cookies to determine the size and habits of our audience on the website or mobile application. Cookies cannot be used to run programs or deliver viruses to your computer or mobile device. Two types of cookies are required to use the website or mobile application:

Session Cookies are temporary cookies that remain only until User log out of the website/mobile application or exit his web browser. Session Cookies store only a unique visitor ID number that may be used to ensure Users are properly authenticated and can view website information.

Persistent Cookies remain in the cookie file of your browser for much longer, even after User leave the website or mobile application. Persistent Cookies store preferences that should persist from visit to visit and enables us to understand how Users use the website and mobile application.

## **Information about your rights**

In compliance with GDPR, User have these rights regarding User's personal data:

- Right of access - the right to be informed of and request access to the personal data TrackingFox collects and process about the User;
- Right to rectification - the right to request TrackingFox to amend or update User's personal data where it is inaccurate or incomplete;
- Right to erasure - the right to request TrackingFox to delete User's personal data;
- Right to restrict - the right to request TrackingFox to temporarily or permanently stop processing all or some of User's personal data;
- Right to object - the right, at any time, to object to us processing User's personal data on grounds relating to particular situation and the right to object to User's personal data being processed for direct marketing purposes;

- Right to personal data portability - the right to request a copy of User's personal data in electronic format and the right to transmit that personal data for use in another party's service;
- Right not to be subject to Automated Decision-making - the right to not be subject to a decision based solely on automated decision making, including profiling, where the decision would have a legal effect on User's or produce a similarly significant effect.

### **Contact Information**

If User has any questions about his personal data or the rights that he has, he is free to contact us by email at: [info@TrackingFox.com](mailto:info@TrackingFox.com). TrackingFox will respond to User's request within 30 calendar days upon verification of his identity.

### **Changes of this Privacy Policy**

TrackingFox reserves the right to change this Privacy Policy at any time without prior notice. TrackingFox will post the changes to this Privacy Policy on the website and mobile application and will indicate the date this Privacy Policy was last revised. Any revised version will be deemed applicable when published on the website and mobile application. It is highly recommended to check this page often as these changes may concern you and your right to personal data protection.

Final revision date: 1<sup>st</sup> December 2020