

# PRIVACY POLICY

## 1. IN GENERAL

1.1. MiniFinder process your personal data when you use our apps, our hardware devices or our website - "Products". The processing of your personal data takes place in compliance with the General Data Protection Regulation ("GDPR").

1.2. In this privacy policy we want to provide you with information about ourselves, how we save and use your personal data, as well as the purposes of the data collection and use.

## 2. CONTROLLER

2.1. Controller. The controller for the data processing within the meaning of the GDPR is MiniFinder. Should you have any questions regarding the processing of your personal data, please do not hesitate to contact us. You can contact us via email [info@minifinder.com](mailto:info@minifinder.com) or telephone: +46(0)470-786 833.

## 3. WHICH DATA WE PROCESS

3.1. In General

MiniFinder processes such personal data, that you as a user of the Products make available to us, for example by using our Products, and that others provide to us.

### 3.2. Data You Provide to Us

Mandatory Information: You have to provide us with certain information in order to register to use most of our products:

- \* Email address;
- \* First and last name
- \* Telephone number

In order to purchase a physical or digital product in the MiniFinder web shop, to order a MiniFinder Start device and/or to activate a MiniFinder GPS tracker, you have to provide additionally data, such as the following: address, post code, city, country

Payment information: We use payment providers (e.g. PayPal, Klarna, Swish, Payson) to process payments. Although we do not store any payment credentials information ourselves, we store a payment ID number that is given out by the respective provider and can be allocated to a person by that payment provider.

Optional Information: Certain information is optional during registration and can also be added later on by you.

### 3.3. Data from Others

The following personal data we retrieve from external services (without being explicitly provided by the user):

- \* IP address
- \* Language (based on the settings of the browser/mobile phone of the user)
- \* Country (based on the ip address)

## 4. USAGE OF EXTERNAL SERVICES AND DATA TRANSFER FOR THIRD PARTIES

### 4.1. Service Use

Google Analytics; General. The MiniFinder websites as well as the MiniFinder apps use Google Analytics, a web analysis service of Google Inc. Google Analytics uses cookies. The information on your usage of the Website created by a cookie, will usually be transmitted to a Google server in the USA and stored there. In case of the activation of the IP- anonymization in the Products, your IP-address will be shortened by Google beforehand within member states of the EU or other members of the Agreement on the European Economic Area. Only in exceptional cases, the entire IP-address will be transmitted to a Google server in the US and shortened there. On behalf of the website operator, Google will use this information in order to evaluate your use of the Products, compose reports on the Product activities, and provide further services to the operator related to the Product and internet usage. The

IP-address transmitted by your browser within the use of Google Analytics will not be combined with other data held by Google.

Opt-Out. You can prevent the collection of data through the cookie concerning your use of the Products (incl. your IP-address) as well as its processing of this data by Google, by downloading and installing the following browser plug-in: <https://tools.google.com/dlpage/gaoptout?hl=en>.

Anonymize IP. The Products use Google Analytics in conjunction with the option "\_anonymizeIP()". This means, IP-addresses are processed in a shortened form in order to prevent transmission of any personal data. Any connection with a specific person is therefore precluded and personal data immediately deleted.

Purpose. MiniFinder uses Google Analytics to analyse and be able to constantly improve the use of MiniFinder Products. Through the statistics, MiniFinder is able to improve its services and make them more interesting for users and to optimize new features and products. In those special cases in which personal data is transmitted to the USA, Google is certified via EU-US privacy shield. The basis for the processing is Art 6 sec 1 subsec f GDPR.

Information on Third-Party Provider. Google Dublin, Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland, Fax: +353 (1) 436 1001; Terms: <https://www.google.com/analytics/terms/gb.html>; overview on data protection: <https://support.google.com/analytics/answer/6004245?hl=en>; and Privacy Policy: <https://www.google.com/intl/de/policies/privacy/>.

Webshop Fulfillment/Shipping/Tracking

For the (partially) automated handling of MiniFinder online shop orders, MiniFinder transmits for the shipping required data to the carrier of choice. MiniFinder primarily works with DHL, Fedex and the PostNord. MiniFinder will transmit required information (such as name, shipping address, email address and phone number) solely for the purpose of the fulfillment of the order.

#### Payment Service Provider

All payments to MiniFinder are handled by external payment providers (Such as Paypal, Klarna, Swish, Payson etc.). In order to capture payments through external payment providers, MiniFinder transmits the following - for the payment relevant - data to the payment service provider:

- \* E-mail address
- \* First Name, Last Name
- \* Address, Zip Code, City, State, Country (for Fraud Detection)
- \* Payment Data (e.g. Credit Card Number)

MiniFinder never stores any Payment Data (e.g. Credit Card Number), but leaves this up to the carefully select payment providers who store your payment details securely.

#### Customer Service Software

##### Tawk.to

MiniFinder offers its users of the website, the online-shop and in the MiniFinder GPS WebApp the option to Live-Chat with the customer service team. To accomplish this, the software Tawk.to is being used. All data being

transmitted through the live chat, will be stored and processed by Tawk.to. Therefore personally identifiable data entered by a user will be transmitted to Tawk.to. Aside from data entered by the user, Tawk.to will automatically store the following data:

- \* Language (detected based on browser language)
- \* IP-address
- \* All personally identifying data are being processed by Tawk.to and are only used to solve customer support cases and support the customer in the Live-Chat environment.
- \* The privacy policy of Tawk.to can be found here:  
<https://www.tawk.to/privacy-policy/>

#### Email Services

In order to send emails (aside from newsletters) MiniFinder uses the following external software and services:

#### MailChimp

For the usage of the above service, the customers Email address, the language, First name and Last name are being transmitted to the service provider. All personally identifying data are being processed by MailChimp Service and are only used to for sending automated and automatically triggered emails.

To analyze performance of emails (such as rate of opening, etc...), the systems use pixel tracking mechanisms, which allow to identify at what point the email was opened and if the user has clicked on a link in the email. Here

you can find the privacy policy MailChimp:  
<https://mailchimp.com/legal/privacy/>

#### Other services

Beside the services mentioned above MiniFinder may use additional services to ensure high quality of all the MiniFinder products (e.g. caching services to reduce the response time of requests). It might be the case that personally identifying data is transmitted to those services. MiniFinder pares the transfer of this data down to the minimum which is required for using the services. The external services process the data on behalf of MiniFinder and do not use the data for their own benefit.

## 4.2. Marketing Services

### Retargeting

MiniFinder websites and apps use retargeting technologies. This allows us to display advertising on partner websites to customers who previously were interested in MiniFinder and/or visited the MiniFinder website.

We are convinced that personalized and interest-based advertising is more interesting and relevant to our customers, compared to advertising without and relevance for the customer. Retargeting technologies analyze the information captured through interactions with MiniFinder (website, online-shop, apps) as well as through cookies, and displays advertising based on the users surf behavior online. More information about cookies can be found in section 5.

MiniFinder uses remarketing services from Google Inc. (AdWords), Microsoft (Bing) and Facebook. MiniFinder remains the right to add additional remarketing providers.

### Affiliate Marketing

MiniFinder also works with Affiliate Marketing Services, who display advertising on partner websites. These providers can store data about your usage of the MiniFinder website and/or MiniFinder apps.

## 5. COOKIES AND PLUGINS

### 5.1. What are Cookies

We use cookies in order to optimise our internet presence. Cookies are small text files that are temporarily stored in the memory of your computer and which allow certain settings and data to be exchanged with our system via your browser. These cookies are deleted when you exit your browser. You can prevent cookies from being saved by selecting the option "Block cookies" in your browser settings. However, this may restrict the functionality of our offer. If you do not want cookies, you can change your browser settings to delete or prevent certain cookies from being stored on your computer or mobile device without your explicit consent. The 'help' section in your browser should provide information on how to manage your cookie settings. Find out how this works for your browser here:

Internet

Explorer:

<https://support.microsoft.com/help/17442/windows-internet-explorer-delete-manage-cookies>

Mozilla Firefox: <http://support.mozilla.com/en-US/kb/Cookies>

Google

Chrome:

<http://www.google.com/support/chrome/bin/answer.py?hl=en&answer=9564>

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Safari: <http://support.apple.com/kb/PH5042>

## 6. WHY WE PROCESS DATA (PURPOSES)

### 6.1. Operating the Products.

We process your Data to be able to provide you with a seamless user experience when using our products.

Selling/Shipping Products. To sell and ship our physical products.

Providing Services. To operate the Products and provide the services, including to

- \* Authenticate your access to an account;
- \* Show statistics about your device
- \* Log and display your position information

### Customer Support

To investigate, respond to your requests, and resolve complaints and service issues, e.g. to contact you about a question you submitted to our customer service team.

### 6.2. Business Needs

We process your Data to manage our business needs, but only as long as your rights and interests do not outweigh ours. This includes advertisements and general marketing.

Performance. We process Data to monitor, analyse and improve the use of our Products and services. As well as protect the security or integrity of the Products as well as their performance and functionality. For example, we analyse User behaviour and perform research about the way you use our Services.

Research and Development. We process data, including public feedback, to conduct research and development for the further development of our Products in order to provide you and others with a better, more intuitive and personalized experience, and drive membership growth and engagement in our Products.

Marketing We process Data to market to you by delivering (tailored) marketing materials about MiniFinder products and online services or the products and services of MiniFinder.

### Advertising

We target and measure the performance of ads to registered users and visitors.

### Newsletter

With your consent we will send you newsletters with relevant information.

## Retargeting

You might see marketing messages (ads) on different platforms (e.g. Google, Facebook, ...). In addition, other users who have similar traits to you on those platforms could see marketing messages on those platforms as well (i.e. Facebook Lookalike audience).

## 6.3. Compliance and Enforcement.

### Compliance

We process your data to comply with our obligations and to comply with all applicable laws and regulations.

### Enforcement

We process your data if we think it's necessary for security purposes or to investigate possible fraud or other violations of our terms and conditions or this privacy policy and/or attempts to harm our Members or Visitors.

## 7. NEWSLETTER /PUSH-NOTIFICATIONS

### 7.1. Newsletter

#### Registration / Cancellation

MiniFinder only sends newsletters in the following cases:

The user decides to register for the MiniFinder newsletter through MiniFinder website or webshop. In this case, the registration is being done with Double-Opt-In. This requires an email to be sent to the user after registration to confirm the registration, in order to avoid registration of Email addresses that are not valid or confirmed.

The user creates a MiniFinder user account and at the same time accepts the Terms of Use of MiniFinder. Customers can at any point in time cancel the subscription of the MiniFinder newsletter. By unsubscribing, MiniFinder will not send any additional emails through MailChimp and will not have access to statistical analysis.

A link to unsubscribe from MiniFinder newsletters will be at the end of every newsletter.

#### Usage of Email Information System “MailChimp”

Email newsletters from MiniFinder are being sent by MailChimp, an email distribution platform by Rocket Science Group (Rocket Science Group, LLC, 675 Ponce De Leon Ave NE #5000, Atlanta, GA 30308, USA)

The email addresses of all MiniFinder newsletter subscribers as well as additional data as described in this document will be stored on servers owned by MailChimp. MailChimp uses the provided information solely for the distribution and analysis on behalf of MiniFinder. Additionally, MailChimp can use the information to improve its services, e.g. optimizing their technical infrastructure and setup, visualization of newsletters or for economical reasons to detect the region of where newsletter subscribers come from.

MailChimp explicitly does NOT use the data provided, to contact any subscribers and will in no circumstance hand over the data and/or email addresses to a third party.

MiniFinder strongly trusts the reliability and the safety of data and the IT infrastructure from MailChimp. MailChimp is certified under the US-EU-Data-Privacy-Agreement “Private Shield” and therefore does consent to fulfil all EU data privacy laws in that regard. The privacy policy from Mailchimp can be found here: <https://mailchimp.com/legal/privacy/>

### Statistical data analysis

Newsletters contain a so called “Tracking Pixel” which allows for statistical analysis. This “Tracking Pixel” allows to track technical information (such as Browser Version, IP-address and the point in time the document was opened. This information is being used to improve the system and service of MailChimp based on technical data or user groups, by looking how often / how long, where (location guess based on IP-address) and when an email is being read.

Part of the statistical analysis is the detection of whether an email has been read, opened and whether a link was clicked in the email. Technically this information can be correlated to a unique user, but it is neither MiniFinder’s nor MailChimp’s intention to track the behavior of individual users. The analysis simply helps MiniFinder understand the reading patterns of its users and to understand whether certain topics in certain emails are more or less interesting to our users.

## 7.2. Push-Notifications

MiniFinder will also send you (based on you allowing this through the apps) push notifications through its mobile apps. Notifications will be related to MiniFinder products (GeoFence Alerts, Battery alerts).

You can disable push notifications for individual apps in your phone settings or uninstall the app to discontinue receiving push notifications.

## 8. SHARING OF PERSONAL DATA

### 8.1. General

We transmit Data to third parties only, if this is necessary for the Purposes, due to a request from a national authority, due to a court ruling, required by law, necessary to investigate and defend ourselves against any third-party claims or allegations, exercise or protect the rights and safety of MiniFinder, our members, personnel, or others, or if you have consented beforehand. We attempt to notify you about legal demands for your personal data when appropriate in our judgment, unless prohibited by law or court order or when the request is an emergency. We may dispute such demands when we believe, in our discretion, that the requests are overbroad, vague or lack proper authority, but we do not promise to challenge every demand.

### 8.2. Service Providers and other Third Party Services

We transfer your information to others, who help us to provide and improve our Products (e.g. maintenance, analysis, audit, payments, fraud detection, marketing and development). Service providers will have access to your information as reasonably necessary to perform these tasks on our behalf

and are obligated not to disclose or use it for other purposes. The list of our Service Providers / Third Party Service can be found in section 4.

## 9. HOW LONG WE STORE DATA

### 9.1. Storage period

We store your Data as long as you are a registered user of the Products. Beyond that, we only store Data, if it is legally necessary (because of warranty, limitation or retention periods) or otherwise required.

### 9.2. Account Deletion

If you decide to delete your account, all personal data we have about you will be deleted with the following exceptions:

Any details made public by you (e.g., shared routes)

Any Data required for MiniFinder's performance of contractual obligations or compliance with statutory retention obligations, shall not be deleted but minimized to the necessary extent.

A deletion request does not affect data, if the storage is legally necessary, for example for accounting purposes.

## 10. WHICH RIGHTS YOU HAVE

### 10.1. Exercise of Rights

To exercise the rights defined in Sections 10.2 to 10.8, please send a request via e-mail to our email address or via mail to our postal address.

## 10.2. Revocation of Consent

You can revoke the consent for future data processing at any time. However, this does not affect the lawfulness of Data processing based on the consent before the revocation.

## 10.3. Right of Access

You have the right to obtain (i) confirmation as to whether or not your Data is being processed by us and, if so, (ii) more specific information on the Data.

## 10.4. Right to Rectification

You have the right to obtain from us the rectification of inaccurate Data concerning you. In case the Data processed by us is not correct, we will rectify these without undue delay and inform you of this rectification.

## 10.5. Right to Erasure

Should you decide, you do not want us to process your data any further, please contact us via mail. We'll delete your account and erase your data. Should mandatory provisions of law prevent such erasure, we will inform you.

## 10.6. Right to Data Portability

You have the right to (i) receive your Data in a structured, commonly used and machine-readable format.

## 10.7. Right to Object

You have the right to object at any time to the processing of Data for which our legitimate interests are the legal basis, including profiling based on those provisions.

#### 10.8. Right to Lodge a Complaint

You have the right to lodge a complaint with a supervisory authority (in Sweden: Datainspektionen), if you think that the processing of Data infringes applicable law, especially the GDPR.

### 11. FURTHER IMPORTANT INFORMATION

#### 11.1. Legal Bases

Data protection laws regulate, that we are only allowed to collect and process your Data, if we have lawful bases for processing. The lawfulness of processing stems from your consent in such cases where you have given consent; the necessity for the fulfillment of your user contract, e.g. where Data is needed for a satisfactory use of the Product; or legitimate interests pursued by MiniFinder or a third party.

Our legitimate interests include protecting you, MiniFinder, or others from security threats or fraud, complying with all applicable laws, managing and improving our business (e.g. customer service, reporting) including possible corporate transactions (e.g. M&A), enabling users to share their and connect via pet experiences, and express all pet related opinions.

#### 11.2. Safety Measures

To avoid unauthorized access to Data and generally secure the Data, we apply the safety measures which comply with the latest technological developments.

### 11.3. Usage of Minors

Users under the age of 18 are not allowed to transmit any personally identifying information to MiniFinder, without the consent of their legal guardian.

## 12. CHANGES TO THE PRIVACY POLICY

### 12.1. General

MiniFinder may change this privacy policy.

### 12.2. Material Changes

If we make material changes to it, we will provide notice directly in our Products, or by other means, to provide you the opportunity to review the changes before they become effective. Material changes will, for example, include further tracking, profiling, and analytics services. Should your consent be necessary, we will obtain it, before the changes become effective. If you object to any changes, you may close your account. You acknowledge that your continued use of our Products after we publish or send a notice about our changes to this privacy policy means that the collection, use and sharing of your personal data is subject to the updated privacy policy.

### 12.3. Last Updated

This privacy policy was last modified on 22/05/2018.