

**PRIVACY POLICY**  
**OF TRACTIVE GMBH**

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## **1. In General**

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- 1.1. We, the team of Tractive GmbH, FN 386930 s, Rاندlstraße 18a, 4061 Pasching, Austria (see our imprint) - "Tractive", 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“) and the Austrian data protection act in its current form.
- 1.2. In this privacy policy we want to provide you with information about ourselves, the nature, scope and purposes of the data collection and use, giving you an insight into the processing of your personal data.

## **2. Controller**

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- 2.1. Controller. The controller for the data processing within the meaning of the GDPR is Tractive. You can contact us via mail under our email address (privacy@tractive.com) or via our help center.
- 2.2. Data Protection Officer. Our data protection officer within the meaning of the GDPR can be contacted under our email address or via our help center. Should you have any questions regarding the processing of your personal data, please do not hesitate to contact him/her.

## **3. Which Data We Process**

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- 3.1. In General. Tractive 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;

In order to purchase a physical or digital product in the Tractive webshop, to order a Tractive Start device and/or to activate a Tractive GPS tracker, you have to provide additionally data, such as the following:

- address, zip code, city, country
- phone number ( for the courier shipping the Product to you)
- Payment information: We use payment providers (e.g. Adyen, PayPal, Klarna, Amazon Pay, a.o.) 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 or can be made available by giving certain rights in the apps, such as:

- date of birth
- profile picture(s)
- pet related data that allows to draw conclusions about the pet owner (e.g. pet chip id)

- GPS position of the user's mobile device (for showing the user position on the map or using the demo mode of the Tractive GPS apps)

### 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)

#### **Registration via Facebook or Google**

If you register a Tractive account via social logins, Tractive receives the following information:

- Facebook: First and last name, email address, gender, date of birth;
- Google: First and last name, email address, gender, date of birth.

#### **Facebook Friend List**

We only receive information about your Facebook friends who also have a Tractive account. We will solely use this information to suggest other Tractive products to your friends and to show your Facebook friends in the Leaderboard of the Activity Monitoring feature.

## **4. Usage of External Services and Data Transfer for Third Parties**

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### 4.1. Service Use

#### **Google Analytics**

*General.* The Tractive website as well as the Tractive 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.* Tractive uses Google Analytics to analyze and be able to constantly improve the use of Tractive Products. Through the statistics, Tractive 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 Tractive online shop orders, Tractive transmits for the shipping required data to the carrier of choice. Tractive primarily works with UPS, Fedex and the General Austrian Mail Service (Österreichische Post).

In certain countries or regions, Tractive uses dropship-services for faster and easier fulfillment of orders. In these countries and regions, Tractive will transmit required information (such as name, shipping-address, email-address and phone number) solely for the purpose of the fulfillment of the order. Tractive currently works with EasyPost, Shipwire and Amazon Fulfillment, but reserves the right to add additional providers in the future.

### **App Analytics**

For Apps on iOS and Android Tractive uses the services of Google Inc. The tools "Fabric" and "Crashlytics" allow Tractive to track and analyze technical issues and bugs that occur in our mobile apps and help us understand how our users are using our app. For this purpose, Fabric and Crashlytics processes mobile identifiers. For more information on Fabric and Crashlytics, click [here](#).

### **Payment Service Provider**

All payments to Tractive are handled by external payment providers (Such as Adyen, Paypal, Klarna, Amazon Pay,...). In order to capture payments through external payment providers, Tractive transmits the following - for the payment relevant - data to the payment service provider:

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

Tractive 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.

### **Billpay's/Klarna's payment options**

In order to be able to offer you Klarna's payment options and to assess whether you qualify for their payment options and to tailor the payment options for you, we will pass to Klarna certain of your personal information.

General information on Klarna you can find [here](#) and on BillPay [here](#). Your personal data is handled in accordance with applicable data protection law and in accordance with the information in [Klarna's](#) and [BillPay's](#) privacy notices.

**For Get first. Pay Later.** Your personal data such as contact and order details, will be transferred from Klarna afterwards to Billpay GmbH ("BillPay"). Billpay will transfer your personal data to credit agencies for purposes of identity and credit checks.

**For Pay Now** (SOFORT Direct Banking) Your personal data such as contact and order details, will be processed by Klarna.

## Customer Service Software

### *Zendesk*

Tractive uses the customer support software Zendesk, in order to manage and answer customer requests via email and via help.tractive.com. All requests will be sent to, stored and processed by Zendesk. All personally identifying information sent through a customer support request will therefore be transmitted to Zendesk. Additionally, Zendesk stores the following information:

- Language (through automated language detection)
- IP-address

All personally identifying data are being processed by Zendesk and are only used to solve customer support cases. The privacy policy of Zendesk can be found [here](#).

### *Tawk.to*

Tractive offers its users of the website, the online-shop and in the Tractive 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](#).

## Email Services

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

- Mailgun
- Mandrill (MailChimp Add-on)
- Amazon Simple Email Service (SES)

For the usage of the above service, the customers E-mail-address, the language, first name and last name are being transmitted to the service provider. All personally identifying data are being processed by Mailgun, Mandrill and Amazon Simple Email Service and are only used for sending automated and automatically triggered emails.

To analyze performance of emails (such as rate of delivery, etc...), these 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 of [Mailgun](#), [Mandrill](#) and [Amazon SES](#).

## Email Verification

In order to verify email addresses Tractive uses the software QuickEmailVerification. This cloud-based software only receives the email address to process it upon automated request from Tractive.

## **Performance/Service Quality Monitoring**

### *New Relic*

To monitor performance and quality of apps and services of Tractive, Tractive uses the software and service "New Relic". To allow detailed analysis and monitoring of Tractive systems, the IP-address as well as the language (based on the browser setting) of the customer is being transferred to New Relic. No other personally identifying data is being transmitted to New Relic.

### *MouseFlow*

To analyze user behavior on the website of Tractive, the software Mouseflow is being used. Mouseflow captures clicks, interactions with the mouse as well as information entered by the customers in any of the forms on the website. In order to secure the privacy of the customer, the recordings are being anonymized. Tractive will not be able to see personally identifying information through Mouseflow.

### **Other services**

Beside the services mentioned above Tractive may use additional services to ensure high quality of all the Tractive 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. Tractive 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 Tractive and do not use the data for their own benefit. The transferred personal data are mainly IP addresses, but other data, such as their name, may also be processed.

## 4.2. Marketing Services

### **Retargeting**

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

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

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

### **Affiliate Marketing**

Tractive also works with Affiliate Marketing Services (Affilinet, Share a Sale, Zanox,...), who display advertising on partner websites. These providers can store data about your usage of the Tractive website and/or Tractive apps.

The following personal related data is forwarded to the Affiliate Marketing Services:

- IP address
- country (as provided in the invoice and delivery settings)

Additionally we forward the webshop order id to the Affiliate Marketing Services. This order number does not allow affiliate partners to infer additional personal information.

## **Rakuten Advertising**

We partner with Rakuten Advertising, who may collect personal information when you interact with our site. The collection and use of this information is subject to the privacy policy located here: <https://rakutenadvertising.com/legal-notices/services-privacy-policy/>

## **5. Cookies and Plugins**

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### **5.1. Cookies**

*What are Cookies.* The Website use 'cookies' – small text files that are placed on your computer, mobile device and/or stored by the browser. If the respective server of our Website is again accessed by the user, the user's browser sends the afore received cookie back to the server. The server can evaluate the information received in this manner in various ways. Cookies cannot run programs or infect your computer/mobile device with a virus. Cookies can help to make websites more user-friendly and effective. They can, for example, be used in order to manage advertisements on the Website or to facilitate navigation on a webpage.

*What are the different cookie types we use?* There are different types of cookies with different uses. Some are there just to allow you to browse the website and see certain features. Some give us an idea on your browsing experience, i.e. when you have trouble finding what you are looking for, so we can improve and make your future visit as pleasant as possible.

Cookies set by Tractive are called "first party cookies". Cookies set by parties other than us are called "third party cookies". Third party cookies enable third party features or functionality to be provided on or through the website (e.g. like advertising, interactive content and analytics). The parties that set these third party cookies can recognize your computer or mobile both when it visits the website in question and also when it visits certain other websites. We use first party and third party cookies for several reasons.

The most important cookies are the required cookies. They are essential and help you to navigate on the website and to use basic features. Then there are functionality cookies that enable you to save your shopping bag and to use other additional features like the live chat. Further, we use the performance and analytics cookies to improve our website. Interaction cookies are used for you to interact with social media. Targeting cookies, advertising cookies and social media cookies capture your preferences in order to show you relevant ads outside Tractive sites. In addition, social media cookies may be used to track your activity over social media platforms.

*Why do we use cookies?* Tractive uses cookies primarily to ensure your visit to our website is as pleasant as possible, as well as for advertising-related purposes during your future visits to other websites. Below you see a more elaborate overview of the types of cookies we are using and why:

#### **Required Cookies**

are essential and help you navigate, move around on the website and see certain features (e.g. these cookies make sure your basket is saved during all the steps of your checkout process). These cookies are required to enable core site functionality. These cookies are stored for the duration of your browsing session.

#### **Functionality and Analytics Cookies**

are there so we can give you an even smoother customer experience (e.g. these cookies help you to save and remind you about your shopping bag). These cookies allow us to analyze site usage so we can measure and improve performance. These cookies may be placed by us or a third party on our behalf and are stored for the duration of your browsing session.

## Advertising and social media cookies

- will remember your product and buying preferences or assist marketing efforts in other ways. These cookies enable us to share data, such as what you like, with our advertisers, so the advertisement you see can be more relevant to your preferences (sometimes referred to as "targeting cookies").
- help us to understand shopping behavior of visitors. This enables us to keep improving our website, so shopping becomes easier and more pleasant, and to improve the marketing messages we send to our customers (sometimes referred to as "performance cookies").
- are used for you to express your opinion. These cookies will enable you to like or recommend us on social media and to chat with our service agents.

Systems/services described in 4) (e.g. Google Analytics, Zendesk, ...) may use cookies to ensure that those tools work correctly.

*What if you don't like 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=95647>
- Safari:  
<http://support.apple.com/kb/PH5042>
- Opera:  
<http://www.opera.com/browser/tutorials/security/privacy/>

Note that you may visit <http://www.aboutads.info/choices> or <http://www.youronlinechoices.eu/> to learn about the options that some of the third parties we work with offer for opting out of certain ad targeting activities. You will need to visit those websites from each browser and device that you would like to be covered by your opt-out. Because the opt-out tools may depend on cookies, you may need to visit these sites again to reinstate your preferences if you delete your cookies.

## 5.2. Plugins

The Tractive Products include social media plugins (e.g. Facebook plugins). Such plugins can recognize a user's IP address and the page visited on the Tractive platform and, possibly, store cookies, so that the services offered by Tractive work properly. Some Apps may use functions of third parties (e.g. Facebook) through the third party's SDK (Software Development Kit), that may process general device data (e.g. device ID etc.). Social media plugins and widgets are hosted either by third party providers or directly by us. Your interactions with these plugins are subject to this privacy policy or the privacy policy of any third party that offers such feature.

TRACTIVE IS NOT RESPONSIBLE FOR THE USE OF, OR GUIDELINES REGARDING THE USE OF, PERSONAL DATA BY THIRD PARTY PROVIDERS.

Users may recognize the respective plugins of third parties, e.g., by the respective logo or other respective characteristic typical for the respective social media-platform on our pages.

If a user interacts with the plugins, e. g. by clicking on the Facebook "Like-Button" or entering a comment, while being logged in to such user's Social Media-account, a user links the contents

of the Tractive pages to her respective social media-profile. Thereby, the social media platforms can associate a user's visit or use of the Products with such user's social media-account. Tractive as the provider of the Products does not have any knowledge of the content of the transmitted data or its usage by the social media platforms. Users can find more information on the issue of data transmission in the privacy policy of the respective social media-platform.

If users do not want to have the respective social media-platform associate their visits on our site with their social media-account, users must log out from their social media-account.

## 6. Why We Process Data (Purposes)

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- 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;
- track your pet's location;
- manage detailed information about your pet
- show statistics about your pet
- log and display your pet's physical activities

*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, analyze 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 analyze User behavior 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 General*. We process Data to market to you by delivering (tailored) marketing materials about Tractive products and online services or the products and services of Tractive.

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

*Newsletter/Push Message Marketing*. With your consent we will send you newsletters with information on pet related topics.

*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

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### 7.1. Newsletter

#### **Registration / Cancellation**

Tractive only sends newsletters in the following cases:

- The user decides to register for the Tractive newsletter through the website [www.tractive.com](http://www.tractive.com) . 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 E-mail-addresses that are not valid or confirmed.
- The user creates a Tractive user account and at the same time accepts the Terms of Use of Tractive.

Customers can at any point in time cancel the subscription of the Tractive newsletter. By unsubscribing, Tractive will not send any additional emails through MailChimp and will not have access to statistical analysis.

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

#### **Usage of Email Information System „MailChimp“**

E-Mail newsletters from Tractive 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 Tractive 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 Tractive. 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 E-Mail-addresses to a third party.

Tractive 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](#).

#### **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 Tractive’s nor MailChimp’s intention to track the behavior of individual users. The analysis simply helps Tractive 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

Tractive will also send you (based on you allowing this through the apps) push notifications through its mobile apps. Notifications will be related to Tractive products (Virtual Fence Alerts, Battery alerts), Tractive App usage and/or information about new Tractive products and services or special offers.

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**

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### 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 Tractive, 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**

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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:

- All data necessary for the fulfillment of contractual obligations or the observance of the statutory retention requirements by Tractive must not be deleted, but minimized to the extent required. An example of this is the retention of the country selected by the customer when activating the GPS tracker. This country is relevant for determining the tax rate that applies. For tax reasons, no deletion of the country selected by the customer takes place here.
- Data published by the customer on external services (for example, GPS routes shared on Facebook) are not revised by deleting the user account.
- Data which serve to uniquely identify a customer (eg email address) is anonymized by the deletion so that it is no longer possible to infer the identity of the user.
- The personal data sent to us by a customer with the deletion request remains stored in our Customer Service Software (Zendesk). The data transmitted to Tractive in the course of this customer inquiry will not be further processed and will only be used to document the deletion request.

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

## 10. Which Rights You Have

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- 10.1. Exercise of Rights. To exercise the rights defined in Sections 10.2 to 10.8, please send a request via email 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 email. 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 Austria: *Datenschutzbehörde*), if you think that the processing of Data infringes applicable law, especially the GDPR.

## 11. Further Important Information

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- 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 Tractive or a third party.

Our legitimate interests include protecting you, Tractive, 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.

The following processing is based on the legitimate interests of Tractive:

- Processing of billing-relevant data to comply with the statutory provision of accounting (for example, determining the tax rate based on the country selected by the customer when activating a GPS tracker).
- Processing demographic data in aggregated form for creating reports that improve the company.

- Processing of email address, delivery address, billing address and IP address to detect potential fraud cases.
  - Processing the IP address to detect and prevent potential attacks on the Tractive software system.
- 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. Pictures. By uploading pictures, you confirm that other persons depicted in the pictures consent to the upload of the respective picture.
- 11.4. Usage of Minors. Users under the age of 18 are not allowed to transmit any personally identifying information to Tractive, without the consent of their legal guardian.

## **12.Changes to the Privacy Policy**

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- 12.1. General. Tractive 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 11/05/2018.