

# Privacy Policy

The AirHub B.V. Privacy Policy was updated on October 9, 2018. Your privacy is important to AirHub B.V. so we've developed a Privacy Policy that covers how we collect, use, disclose, transfer, and store your personal information. In addition to this Privacy Policy, we provide data and privacy information imbedded in our products for certain features that ask to use your personal information. You can review this information before enabling these features, in Settings related to those features. Please take a moment to familiarize yourself with our privacy practices and contact us if you have any questions.

## **Collection and Use of Personal Information**

Personal information is data that can be used to identify or contact a single person.

You may be asked to provide your personal information anytime you are in contact with AirHub B.V. or an AirHub B.V. affiliated company. AirHub B.V. and its affiliates may share this personal information with each other and use it consistent with this Privacy Policy. They may also combine it with other information to provide and improve our products, services, content, and advertising. You are not required to provide the personal information that we have requested, but, if you chose not to do so, in many cases we will not be able to provide you with our products or services or respond to any queries you may have.

Here are some examples of the types of personal information AirHub B.V. may collect and how we may use it:

## **What personal information we collect**

- When you create a profile in an app developed by AirHub B.V., purchase a product, download a software update, connect to our services, contact us or participate in an online survey, we may collect a variety of information, including

your name, mailing address, phone number, email address, contact preferences, device identifiers, IP address, location information and credit card information.

- When you share your content with family and friends using AirHub B.V. products or invite others to participate in AirHub B.V. services or forums, AirHub B.V. may collect the information you provide about those people such as name, mailing address, email address, and phone number. AirHub B.V. will use such information to fulfill your requests, provide the relevant product or service, or for anti-fraud purposes.
- In certain jurisdictions, we may ask for a government issued ID in limited circumstances including when setting up an account and activating your application or as required by law.

## **How we use your personal information**

We may process your personal information for the purposes described in this Privacy Policy with your consent, for compliance with a legal obligation to which AirHub B.V. is subject or when we have assessed it is necessary for the purposes of the legitimate interests pursued by AirHub B.V. or a third party to whom it may be necessary to disclose information.

- The personal information we collect allows us to keep you posted on AirHub B.V.'s latest product announcements, software updates, and upcoming events. If you don't want to be on our mailing list, you can opt out anytime by contacting us.
- We also use personal information to help us create, develop, operate, deliver, and improve our products, services, content and advertising, and for loss prevention and anti-fraud purposes. We may also use your personal information for account and network security purposes, including in order to protect our services for the benefit of all our users. Where we use your information for anti-fraud purposes it arises from the conduct of an online transaction with us. We limit our uses of data for anti-fraud purposes to those which are strictly necessary and within our assessed legitimate interests to protect our customers and our services. For certain online transactions we may also validate the information provided by you with publicly accessible sources.
- We may use your personal information, including date of birth, to verify identity, assist with identification of users, and to determine appropriate services. For

example, we may use date of birth to determine the age of AirHub account holders.

- From time to time, we may use your personal information to send important notices, such as communications about purchases and changes to our terms, conditions, and policies. Because this information is important to your interaction with AirHub B.V., you may not opt out of receiving these communications.
- We may also use personal information for internal purposes such as auditing, data analysis, and research to improve AirHub B.V.'s products, services, and customer communications.
- If you enter into a sweepstake, contest, or similar promotion we may use the information you provide to administer those programs.

### **Source of your personal information where they are not collected from you**

We may have received your personal information from other persons if that person has shared their content with you using AirHub B.V. products or invited you to participate in AirHub B.V. services or forums. We may also validate the information provided by you when creating an AirHub B.V. ID with a third party for security and fraud prevention purposes.

For research and development purposes, we may use datasets such as those that contain images, voices or other data that could be associated with an identifiable person. When acquiring such datasets, we do so in accordance with applicable law in the jurisdiction in which the dataset is hosted. When using such datasets for research and development, we do not attempt to re-identify individuals who may appear therein.

### **Collection and Use of Non-Personal Information**

We also collect data in a form that does not, on its own, permit direct association with any specific individual. We may collect, use, transfer, and disclose non-personal information for any purpose. The following are some examples of non-personal information that we collect and how we may use it:

- We may collect information such as language, zip code, area code, unique device identifier, referrer URL, location, and the time zone where an AirHub B.V. product

is used so that we can better understand customer behavior and improve our products, services, and advertising.

- We may collect information regarding customer activities on our website and from our other products and services. This information is aggregated and used to help us provide more useful information to our customers and to understand which parts of our website, products, and services are of most interest. Aggregated data is considered non-personal information for the purposes of this Privacy Policy.
- We may collect and store details of how you use our services, including search queries. This information may be used to improve the relevancy of results provided by our services. Except in limited instances to ensure quality of our services over the Internet, such information will not be associated with your IP address.
- With your explicit consent, we may collect data about how you use your device and applications in order to help app developers improve their apps.

If we do combine non-personal information with personal information the combined information will be treated as personal information for as long as it remains combined.

## **Cookies and Other Technologies**

AirHub B.V.'s websites, online services, interactive applications, email messages, and advertisements may use "cookies" and other technologies such as pixel tags and web beacons. These technologies help us better understand user behavior, tell us which parts of our websites people have visited, and facilitate and measure the effectiveness of advertisements and web searches. We treat information collected by cookies and other technologies as non-personal information. However, to the extent that Internet Protocol (IP) addresses or similar identifiers are considered personal information by local law, we also treat these identifiers as personal information. Similarly, to the extent that non-personal information is combined with personal information, we treat the combined information as personal information for the purposes of this Privacy Policy.

AirHub B.V. and our partners also use cookies and other technologies to remember personal information when you use our website, online services, and applications. Our goal in these cases is to make your experience with AirHub B.V. more convenient and personal.

If you want to disable cookies and you're using the Safari web browser, go to Safari preferences and then to the privacy pane to manage your preferences. For other browsers, check with your provider to find out how to disable cookies. Please note that certain features of the AirHub B.V. website will not be available once cookies are disabled.

As is true of most internet services, we gather some information automatically and store it in log files. This information includes Internet Protocol (IP) addresses, browser type and language, Internet service provider (ISP), referring and exit websites and applications, operating system, date/time stamp, and clickstream data.

We use this information to understand and analyze trends, to administer the site, to learn about user behavior on the site, to improve our product and services, and to gather demographic information about our user base as a whole. AirHub B.V. may use this information in our marketing and advertising services.

In some of our email messages, we use a "click-through URL" linked to content on the AirHub website. When customers click one of these URLs, they pass through a separate web server before arriving at the destination page on our website. We track this click-through data to help us determine interest in particular topics and measure the effectiveness of our customer communications. If you prefer not to be tracked in this way, you should not click text or graphic links in the email messages.

Pixel tags enable us to send email messages in a format customers can read, and they tell us whether mail has been opened. We may use this information to reduce or eliminate messages sent to customers.

### **Disclosure to Third Parties**

At times AirHub B.V. may make certain personal information available to strategic partners that work with AirHub B.V. to provide products and services, or that help AirHub B.V. market to customers. Personal information will only be shared by AirHub B.V. to provide or improve our products, services and advertising; it will not be shared with third parties for their marketing purposes.

## **Service Providers**

AirHub B.V. shares personal information with companies who provide services such as information processing, extending credit, fulfilling customer orders, delivering products to you, managing and enhancing customer data, providing customer service, assessing your interest in our products and services, and conducting customer research or satisfaction surveys. These companies are obligated to protect your information and may be located wherever AirHub B.V. operates.

## **Others**

It may be necessary – by law, legal process, litigation, and/or requests from public and governmental authorities within or outside your country of residence – for AirHub B.V. to disclose your personal information. We may also disclose information about you if we determine that for purposes of national security, law enforcement, or other issues of public importance, disclosure is necessary or appropriate.

We may also disclose information about you if we determine that disclosure is reasonably necessary to enforce our terms and conditions or protect our operations or users. Additionally, in the event of a reorganization, merger, or sale we may transfer any and all personal information we collect to the relevant third party.

## **Protection of Personal Information**

AirHub B.V. takes the security of your personal information very seriously. AirHub B.V. online services protect your personal information during transit using encryption such as Transport Layer Security (TLS).

When you use some AirHub B.V. products, services, or applications or post on an AirHub B.V. forum, chat room, or social networking service, the personal information and content you share is visible to other users and can be read, collected, or used by them. You are responsible for the personal information you choose to share or submit in these instances. For example, if you list your name and email address in a forum posting, that information is public. Please take care when using these features.

## **The existence of Automated Decision-Making, Including Profiling**

AirHub B.V. does not take any decisions involving the use of algorithms or profiling that significantly affects you.

## **Integrity and Retention of Personal Information**

AirHub B.V. makes it easy for you to keep your personal information accurate, complete, and up to date. We will retain your personal information for the period necessary to fulfill the purposes outlined in this Privacy Policy and our service specific privacy summaries. When assessing these periods we carefully examine our need to collect personal information at all and if we establish a relevant need we only retain it for the shortest possible period to realize the purpose of collection unless a longer retention period is required by law.

## **Access to Personal Information**

You can help ensure that your contact information and preferences are accurate, complete, and up to date by signing in to your applications account page. For other personal information we hold, we will provide you with access (including a copy) for any purpose including to request that we correct the data if it is inaccurate or delete the data if AirHub B.V. is not required to retain it by law or for legitimate business purposes. We may decline to process requests that are frivolous/vexatious, jeopardize the privacy of others, are extremely impractical, or for which access is not otherwise required by local law. We may also decline aspects of deletion or access requests if we believe doing so would undermine our legitimate use of data for anti-fraud and security purposes as described earlier.

## **Children & Education**

We understand the importance of taking extra precautions to protect the privacy and safety of children using AirHub B.V. products and services. Children under the age of 13, or equivalent minimum age in the relevant jurisdiction, are not permitted to create their own accounts in AirHub B.V.'s product, unless their parent provided verifiable consent

If we learn that we have collected the personal information of a child under 13, or equivalent minimum age depending on jurisdiction, outside the above circumstances we will take steps to delete the information as soon as possible.

### **Location-Based Services**

To provide location-based services on AirHub B.V. products, AirHub B.V. and our partners and licensees may collect, use, and share precise location data, including the real-time geographic location of your AirHub B.V. computer or device. Where available, location-based services may use GPS, Bluetooth, and your IP Address, along with crowd-sourced Wi-Fi hotspot and cell tower locations, and other technologies to determine your devices' approximate location. Unless you provide consent, this location data is collected anonymously in a form that does not personally identify you and is used by AirHub B.V. and our partners and licensees to provide and improve location-based products and services. For example, your device may share its geographic location with application providers when you opt in to their location services.

### **Third-Party Sites and Services**

AirHub B.V. websites, products, applications, and services may contain links to third-party websites, products, and services. Our products and services may also use or offer products or services from third parties – for example, a third-party iPhone app.

Information collected by third parties, which may include such things as location data or contact details, is governed by their privacy practices. We encourage you to learn about the privacy practices of those third parties.

### **Our Companywide Commitment to Your Privacy**

To make sure your personal information is secure, we communicate our privacy and security guidelines to AirHub B.V. employees and strictly enforce privacy safeguards within the company.



## **Privacy Questions**

If you have any questions or concerns about AirHub B.V.'s Privacy Policy or data processing or if you would like to make a complaint about a possible breach of local privacy laws, please contact us. You can always contact us by phone as well.

AirHub B.V. may update its Privacy Policy from time to time. When we change the policy in a material way, a notice will be posted on our website along with the updated Privacy Policy.

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