

Privacy Policy of Hagen Bikes

Hagen Bikes collects some Personal Data from its Users.

This document can be printed for reference by using the print command in the settings of any browser.

Owner and Data Controller

Hagen Bikes
Tartu mnt 173,
Peetri 75312,
Estonia

Owner contact email: info@hagenbikes.com

Types of Data collected

Among the types of Personal Data that Hagen Bikes collects, by itself or through third parties, there are: User ID; first name; last name; phone number; Tracker; Usage Data; device information; geographic position; Universally unique identifier (UUID); crash data; various types of Data; email address.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using Hagen Bikes.

Unless specified otherwise, all Data requested by Hagen Bikes is mandatory and failure to provide this Data may make it impossible for Hagen Bikes to provide its services. In cases where Hagen Bikes specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

Any use of Cookies – or of other tracking tools – by Hagen Bikes or by the owners of third-party services used by Hagen Bikes serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document.

Users are responsible for any third-party Personal Data obtained, published or shared through Hagen Bikes.

Mode and place of processing the Data

Methods of processing

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of Hagen Bikes (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

Place

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

Retention time

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following: Hosting and backend infrastructure, Registration and authentication, Remarketing and behavioral targeting, Managing contacts and sending messages, Analytics, Platform services and hosting, Handling activities related to productivity, Infrastructure monitoring, Location-based interactions and Access to third-party accounts.

For specific information about the Personal Data used for each purpose, the User may refer to the section "Detailed information on the processing of Personal Data".

Detailed information on the processing of Personal Data

Personal Data is collected for the following purposes and using the following services:

Access to third-party accounts

This type of service allows Hagen Bikes to access Data from your account on a third-party service and perform actions with it.

These services are not activated automatically, but require explicit authorization by the User.

Strava integration

The app will send user-tracked ride information to the Strava application, including GPS coordinates of the route.

Analytics

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

Google Analytics for Firebase (Google Ireland Limited)

Google Analytics for Firebase or Firebase Analytics is an analytics service provided by Google Ireland Limited.

In order to understand Google's use of Data, consult [Google's partner policy](#).

Firebase Analytics may share Data with other tools provided by Firebase, such as Crash Reporting, Authentication, Remote Config or Notifications. The User may check this privacy policy to find a detailed explanation about the other tools used by the Owner.

Hagen Bikes uses identifiers for mobile devices and technologies similar to cookies to run the Firebase Analytics service.

Users may opt-out of certain Firebase features through applicable device settings, such as the device advertising settings for mobile phones or by following the instructions in other Firebase related sections of this privacy policy, if available.

Personal Data processed: device information.

Place of processing: Ireland - [Privacy Policy](#).

Handling activities related to productivity

This type of service helps the Owner to manage tasks, collaboration and, in general, activities related to productivity. In using this type of service, Data of Users will be processed and may be retained, depending on the purpose of the activity in question.

These services may be integrated with a wide range of third-party services disclosed within this privacy policy to enable the Owner to import or export Data needed for the relative activity.

Google Sheets (Google Ireland Limited)

Google Sheets is an online spreadsheet and collaboration service provided by Google Ireland Limited.

Personal Data processed: geographic position.

Place of processing: Ireland - [Privacy Policy](#).

Hosting and backend infrastructure

This type of service has the purpose of hosting Data and files that enable Hagen Bikes to run and be distributed as well as to provide a ready-made infrastructure to run specific features or parts of Hagen Bikes.

Some services among those listed below, if any, may work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

Google Cloud Storage (Google Ireland Limited)

Google Cloud Storage is a hosting service provided by Google Ireland Limited.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: Ireland - [Privacy Policy](#).

Google BigQuery

Google BigQuery is a hosting and backend service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States - [Privacy Policy](#); Ireland - [Privacy Policy](#).

Google App Engine (Google Ireland Limited)

Google App Engine is a hosting service provided by Google Ireland Limited.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: Ireland - [Privacy Policy](#).

Infrastructure monitoring

This type of service allows Hagen Bikes to monitor the use and behavior of its components so its performance, operation, maintenance and troubleshooting can be improved.

Which Personal Data are processed depends on the characteristics and mode of implementation of these services, whose function is to filter the activities of Hagen Bikes.

Crashlytics (Google Ireland Limited)

Crashlytics is a monitoring service provided by Google Ireland Limited.

Personal Data processed: crash data; device information; Universally unique identifier (UUID).

Place of processing: Ireland - [Privacy Policy](#).

Firebase Performance Monitoring (Google Ireland Limited)

Firebase Performance Monitoring is a monitoring service provided by Google Ireland Limited.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: Ireland - [Privacy Policy](#).

Location-based interactions

Location tracking in the background

We collect and process location information for when you use the ride tracking functionality in the app. We do not track your device location when you are not using the app.

If you would like to stop the device location tracking, you may do so at any time by adjusting your device settings.

Managing contacts and sending messages

This type of service makes it possible to manage a database of email contacts, phone contacts or any other contact information to communicate with the User.

These services may also collect data concerning the date and time when the message was viewed by the User, as well as when the User interacted with it, such as by clicking on links included in the message.

Firestore (Google Ireland Limited)

Firestore is a message sending service provided by Google Ireland Limited. Firestore can be integrated with Firebase Analytics to target analytics-based audiences and track opening and conversion events.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: Ireland - [Privacy Policy](#).

Firestore (Google Ireland Limited)

Firestore is a message sending service provided by Google Ireland Limited. Firestore allows the Owner to send messages and notifications to Users across platforms such as Android, iOS, and the web. Messages can be sent to single devices, groups of devices, or specific topics or User segments.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: Ireland - [Privacy Policy](#).

Mailgun (Mailgun Technologies, Inc.)

Mailgun is an email address management and message sending service provided by Mailgun Technologies, Inc.

Personal Data processed: email address.

Place of processing: Germany - [Privacy Policy](#).

Platform services and hosting

These services have the purpose of hosting and running key components of Hagen Bikes, therefore allowing the provision of Hagen Bikes from within a unified platform. Such platforms provide a wide range of tools to the Owner – e.g. analytics, user registration, commenting, database management, e-commerce, payment processing – that imply the collection and handling of Personal Data.

Some of these services work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

Google Play Store (Google Ireland Limited)

Hagen Bikes is distributed on the Google Play Store, a platform for the distribution of mobile apps, provided by Google Ireland Limited.

By virtue of being distributed via this app store, Google collects usage and diagnostics data and share aggregate information with the Owner. Much of this information is processed on an opt-in basis.

Users may opt-out of this analytics feature directly through their device settings. More information on how to manage analysis settings can be found on [this page](#).

Personal Data processed: Usage Data.

Place of processing: Ireland - [Privacy Policy](#).

Apple App Store (Apple Inc.)

Hagen Bikes is distributed on Apple's App Store, a platform for the distribution of mobile apps, provided by Apple Inc.

By virtue of being distributed via this app store, Apple collects basic analytics and provides reporting features that enables the Owner to view usage analytics data and measure the performance of Hagen Bikes. Much of this information is processed on an opt-in basis.

Users may opt-out of this analytics feature directly through their device settings. More information on how to

manage analysis settings can be found on [this page](#).

Personal Data processed: Usage Data.

Place of processing: United States – [Privacy Policy](#).

Registration and authentication

By registering or authenticating, Users allow Hagen Bikes to identify them and give them access to dedicated services.

Depending on what is described below, third parties may provide registration and authentication services. In this case, Hagen Bikes will be able to access some Data, stored by these third-party services, for registration or identification purposes.

Some of the services listed below may also collect Personal Data for targeting and profiling purposes; to find out more, please refer to the description of each service.

Sign in with Apple (Apple Inc.)

Sign in with Apple is a registration and authentication service provided by Apple Inc. In cases where Users are required to provide their email address, Sign in with Apple may generate a private relay address on behalf of Users that automatically forwards messages to their verified personal email account - therefore shielding their actual email address from the Owner.

Personal Data processed: first name; last name; phone number; User ID.

Place of processing: United States – [Privacy Policy](#).

Facebook Oauth (Meta Platforms Ireland Limited)

Facebook Oauth is a registration and authentication service provided by Meta Platforms Ireland Limited and is connected to the Facebook social network.

Personal Data processed: Tracker; various types of Data.

Place of processing: Ireland – [Privacy Policy](#).

Facebook Authentication (Meta Platforms Ireland Limited)

Facebook Authentication is a registration and authentication service provided by Meta Platforms Ireland Limited and is connected to the Facebook social network.

Personal Data processed: Tracker; various types of Data as specified in the privacy policy of the service.

Place of processing: Ireland – [Privacy Policy](#).

Strava authentication

Strava authentication will gather user's first name, gender and profile image.

Remarketing and behavioral targeting

This type of service allows Hagen Bikes and its partners to inform, optimize and serve advertising based on past use of Hagen Bikes by the User.

This activity is facilitated by tracking Usage Data and by using Trackers to collect information which is then transferred to the partners that manage the remarketing and behavioral targeting activity.

Some services offer a remarketing option based on email address lists.

Services of this kind usually offer the possibility to opt out of such tracking. In addition to any opt-out feature offered by any of the services below, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section "How to opt-out of interest-based advertising" in this document.

Google Ads Remarketing (Google Ireland Limited)

Google Ads Remarketing is a remarketing and behavioral targeting service provided by Google Ireland Limited that connects the activity of Hagen Bikes with the Google Ads advertising network and the DoubleClick Cookie.

In order to understand Google's use of Data, consult [Google's partner policy](#).

Users can opt out of Google's use of Trackers for ads personalization by visiting Google's [Ads Settings](#).

Personal Data processed: Tracker; Usage Data.

Place of processing: Ireland – [Privacy Policy](#) – [Opt Out](#).

Information on opting out of interest-based advertising

In addition to any opt-out feature provided by any of the services listed in this document, Users may follow the instructions provided by [YourOnlineChoices](#) (EU), the [Network Advertising Initiative](#) (US) and the [Digital Advertising Alliance](#) (US), [DAAC](#) (Canada), [DDAI](#) (Japan) or other similar initiatives. Such initiatives allow Users to select their tracking preferences for most of the advertising tools. The Owner thus recommends that Users make use of these resources in addition to the information provided in this document.

The Digital Advertising Alliance offers an application called [AppChoices](#) that helps Users to control interest-based advertising on mobile apps.

Users may also opt out of certain advertising features through applicable device settings, such as the device advertising settings for mobile phones or ads settings in general.

Further information about the processing of Personal Data

Push notifications

Hagen Bikes may send push notifications to the User to achieve the purposes outlined in this privacy policy.

Users may in most cases opt-out of receiving push notifications by visiting their device settings, such as the notification settings for mobile phones, and then change those settings for Hagen Bikes, some or all of the apps on the particular device.

Users must be aware that disabling push notifications may negatively affect the utility of Hagen Bikes.

Further Information for Users

Legal basis of processing

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes.
- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

Further information about retention time

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to fulfil a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right of access, the right to

erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

The rights of Users based on the General Data Protection Regulation (GDPR)

Users may exercise certain rights regarding their Data processed by the Owner.

In particular, Users have the right to do the following, to the extent permitted by law:

- **Withdraw their consent at any time.** Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- **Object to processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent.
- **Access their Data.** Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- **Verify and seek rectification.** Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- **Restrict the processing of their Data.** Users have the right to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- **Have their Personal Data deleted or otherwise removed.** Users have the right to obtain the erasure of their Data from the Owner.
- **Receive their Data and have it transferred to another controller.** Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance.
- **Lodge a complaint.** Users have the right to bring a claim before their competent data protection authority.

Users are also entitled to learn about the legal basis for Data transfers abroad including to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

Details about the right to object to processing

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time, free of charge and without providing any justification. Where the User objects to processing for direct marketing purposes, the Personal Data will no longer be processed for such purposes. To learn whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

How to exercise these rights

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. Such requests are free of charge and will be answered by the Owner as early as possible and always within one month, providing Users with the information required by law. Any rectification or erasure of Personal Data or restriction of processing will be communicated by the Owner to each recipient, if any, to whom the Personal Data has been disclosed unless this proves impossible or involves disproportionate effort. At the Users' request, the Owner will inform them about those recipients.

Additional information about Data collection and processing

Legal action

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of Hagen Bikes or the related Services. The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

Additional information about User's Personal Data

In addition to the information contained in this privacy policy, Hagen Bikes may provide the User with additional and contextual information concerning particular Services or the collection and processing of

Personal Data upon request.

System logs and maintenance

For operation and maintenance purposes, Hagen Bikes and any third-party services may collect files that record interaction with Hagen Bikes (System logs) or use other Personal Data (such as the IP Address) for this purpose.

Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

Changes to this privacy policy

The Owner reserves the right to make changes to this privacy policy at any time by notifying its Users on this page and possibly within Hagen Bikes and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User's consent, the Owner shall collect new consent from the User, where required.

Definitions and legal references

Personal Data (or Data)

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

Usage Data

Information collected automatically through Hagen Bikes (or third-party services employed in Hagen Bikes), which can include: the IP addresses or domain names of the computers utilized by the Users who use Hagen Bikes, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

User

The individual using Hagen Bikes who, unless otherwise specified, coincides with the Data Subject.

Data Subject

The natural person to whom the Personal Data refers.

Data Processor (or Processor)

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

Data Controller (or Owner)

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of Hagen Bikes. The Data Controller, unless otherwise specified, is the Owner of Hagen Bikes.

Hagen Bikes (or this Application)

The means by which the Personal Data of the User is collected and processed.

Service

The service provided by Hagen Bikes as described in the relative terms (if available) and on this site/application.

European Union (or EU)

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

Cookie

Cookies are Trackers consisting of small sets of data stored in the User's browser.

Tracker

Tracker indicates any technology - e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that enables the tracking of Users, for example by accessing or storing information on the User's device.

Legal information

This privacy policy relates solely to Hagen Bikes, if not stated otherwise within this document.

Latest update: August 25, 2023