

Privacy Policy of Meadow

Meadow 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

The Spatial Computing Company
Hackney Depot
5 Sheep Lane
London E8 4QS
United Kingdom

Owner contact email: support@meadow.space

Types of Data collected

Among the types of Personal Data that Meadow collects, by itself or through third parties, there are: Usage Data; Universally unique identifier (UUID); crash data; device information; precise location; Camera permission; Precise location permission (non-continuous); Microphone permission; Motion sensors permission; Write-only Photo Library permission.

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 Meadow. Unless specified otherwise, all Data requested by Meadow is mandatory and failure to provide this Data may make it impossible for Meadow to provide its services. In cases where Meadow 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 Meadow or by the owners of third-party services used by Meadow serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy.

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

Mode and place of processing the Data

Methods of processing

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

The Data processing is carried out using computers and/or IT enabled tools, following organisational 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 Meadow (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

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for.

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, Infrastructure monitoring, Location-based interactions and Device permissions for Personal Data access.

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”.

Device permissions for Personal Data access

Depending on the User's specific device, Meadow may request certain permissions that allow it to access the User's device Data as described below.

By default, these permissions must be granted by the User before the respective information can be accessed. Once the permission has been given, it can be revoked by the User at any time. In order to revoke these permissions, Users may refer to the device settings or contact the Owner for support at the contact details provided in the present document. The exact procedure for controlling app permissions may be dependant on the User's device and software.

Please note that the revoking of such permissions might impact the proper functioning of Meadow.

If User grants any of the permissions listed below, the respective Personal Data may be processed (i.e accessed to, modified or removed) by Meadow.

Camera permission

Used for accessing the camera or capturing images and video from the device.

Microphone permission

Allows accessing and recording microphone audio from the User's device.

Motion sensors permission

Used for accessing the User's device motion sensors to measure the User's activity such as step counts, stairs climbed, and movement type (walking, cycling, etc.).

Precise location permission (non-continuous)

Used for accessing the User's precise device location. Meadow may collect, use, and share User location Data in order to provide location-based services. The geographic location of the User is determined in a manner that isn't continuous. This means that it is impossible for Meadow to derive the exact position of the User on a continuous basis.

Write-only Photo Library permission

Allows write-only access to the User's photo library.

Detailed information on the processing of Personal Data

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

Device permissions for Personal Data access

Meadow requests certain permissions from Users that allow it to access the User's device Data as described below.

Device permissions for Personal Data access (Meadow)

Meadow requests certain permissions from Users that allow it to access the User's device Data as summarized here and described within this document.

Personal Data processed: Camera permission; Microphone permission; Motion sensors permission; Precise location permission (non-continuous); Write-only Photo Library permission.

Hosting and backend infrastructure

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

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.

Firestore Realtime Database (Google Ireland Limited)

Firestore Realtime Database is a hosting and backend service provided by Google Ireland Limited.

Personal Data processed: Usage Data; 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 Meadow to monitor the use and behaviour 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 Meadow.

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](#).

Location-based interactions

Geolocation (Meadow)

Meadow may collect, use, and share User location Data in order to provide location-based services. Most browsers and devices provide tools to opt out from this feature by default. If explicit authorisation has been provided, the User's location data may be tracked by Meadow.

Personal Data processed: precise location.

Cookie Policy

Meadow uses Trackers. To learn more, Users may consult the [Cookie Policy](#).

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

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for.

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 of Data transfers to a country outside the European Union or to any international organisation 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.

If any such transfer takes place, Users can find out more by checking the relevant sections of this document or enquire with the Owner using the information provided in the contact section.

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 Meadow 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, Meadow 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, Meadow and any third-party services may collect files that record interaction with Meadow (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 Meadow 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 Meadow (or third-party services employed in Meadow), which can include: the IP addresses or domain names of the computers utilised by the Users who use Meadow, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilised 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 utilised 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 Meadow 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 Meadow. The Data Controller, unless otherwise specified, is the Owner of Meadow.

Meadow (or this Application)

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

Service

The service provided by Meadow 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.

Legal information

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

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