Privacy Policy of ÄIKE

ÄIKE 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

Comodule OÜ Dunkri 9, 10123 Tallinn, Estonia

Owner contact email: info@rideaike.com

Types of Data collected

Among the types of Personal Data that ÄIKE collects, by itself or through third parties, there are: geographic position; Universally unique identifier (UUID); crash data; device information; Tracker; Usage Data; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); geography/region; number of Users; number of sessions; session duration; Application opens; Application updates; launches; operating systems; email address; country; device logs; first name; last name; app information; Camera permission; Precise location permission (continuous); Precise location permission (non-continuous); Approximate location permission (continuous); Approximate location permission (non-continuous); Bluetooth sharing permission; Photo Library permission; various types of Data; phone number; password; profile picture; User ID; answers to questions; clicks; keypress events; motion sensor events; mouse movements; scroll position; touch events.

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 ÄIKE.

Unless specified otherwise, all Data requested by ÄIKE is mandatory and failure to provide this Data may make it impossible for ÄIKE to provide its services. In cases where ÄIKE 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 ÄIKE or by the owners of third-party services used by ÄIKE 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 ÄIKE.

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 ÄIKE (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: Location-based interactions, Infrastructure monitoring, Analytics, Beta Testing, Contacting the User, Device permissions for Personal Data access, Displaying content from external platforms, Hosting and backend infrastructure, Managing contacts and sending messages, Platform services and hosting, Registration and authentication, Social features, SPAM protection and Interaction with support and feedback platforms.

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, ÄIKE 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 dependent on the User's device and software.

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

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

Approximate location permission (continuous)

Used for accessing the User's approximate device location. ÄIKE may collect, use, and share User location Data in order to provide location-based services.

Approximate location permission (non-continuous)

Used for accessing the User's approximate device location. ÄIKE 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 ÄIKE to derive the approximate position of the User on a continuous basis.

Bluetooth sharing permission

Used for accessing Bluetooth related functions such as scanning for devices, connecting with devices, and allowing data transfer between devices.

Camera permission

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

Photo Library permission

Allows access to the User's Photo Library.

Precise location permission (continuous)

Used for accessing the User's precise device location. ÄIKE may collect, use, and share User location Data in order to provide location-based services.

Precise location permission (non-continuous)

Used for accessing the User's precise device location. ÄIKE 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 ÄIKE to derive the exact position of the User on a continuous basis.

Detailed information on the processing of Personal Data

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

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.

ÄIKE 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: Application opens; Application updates; device information; geography/region; launches; number of sessions; number of Users; operating systems; session duration; Tracker; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); Usage Data.

Place of processing: Ireland - Privacy Policy.

Beta Testing

This type of service makes it possible to manage User access to ÄIKE, or parts of it, for the purpose of testing a certain feature or the entire Application.

The service provider may automatically collect data related to crashes and statistics related to the User's use of ÄIKE in a personally identifiable form.

Google Play Beta Testing (Google Ireland Limited)

Google Play Beta Testing is a beta testing service provided by Google Ireland Limited.

Personal Data processed: country; device information; device logs; email address; first name; last name; Tracker; Usage Data.

Place of processing: Ireland - Privacy Policy.

TestFlight (Apple Inc.)

TestFlight is a beta testing service provided by Apple Inc.

Personal Data processed: app information; country; device logs; email address; first name; last name; Usage Data.

Place of processing: United States - Privacy Policy.

Contacting the User

Mailing list or newsletter (AIKE)

By registering on the mailing list or for the newsletter, the User's email address will be added to the contact list of those who may receive email messages containing information of commercial or promotional nature

concerning ÄIKE. Your email address might also be added to this list as a result of signing up to ÄIKE or after making a purchase.

Personal Data processed: email address.

Device permissions for Personal Data access

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

Device permissions for Personal Data access (ÄIKE)

ÄIKE 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: Approximate location permission (continuous); Approximate location permission (non-continuous); Bluetooth sharing permission; Camera permission; Photo Library permission; Precise location permission (continuous); Precise location permission (non-continuous).

Displaying content from external platforms

This type of service allows you to view content hosted on external platforms directly from the pages of ÄIKE and interact with them.

This type of service might still collect web traffic data for the pages where the service is installed, even when Users do not use it.

Google Maps widget (Google Ireland Limited)

Google Maps is a maps visualization service provided by Google Ireland Limited that allows ÄIKE to incorporate content of this kind on its pages.

Personal Data processed: Tracker; Usage Data.

Place of processing: Ireland - Privacy Policy.

Hosting and backend infrastructure

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

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.

Firebase Cloud Firestore (Google Ireland Limited)

Firebase Cloud Firestore 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: Germany - <u>Privacy Policy</u>.

Firebase Cloud Functions (Google Ireland Limited)

Firebase Cloud Functions 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: United States - Privacy Policy; Belgium - Privacy Policy.

Firebase Cloud Storage (Google Ireland Limited)

Firebase Cloud Storage is a hosting 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: Belgium - Privacy Policy; Germany - Privacy Policy.

Infrastructure monitoring

This type of service allows ÄIKE 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 ÄIKE.

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.

Interaction with support and feedback platforms

This type of service allows Users to interact with third-party support and feedback platforms directly from the pages of ÄIKE.

If one of these services is installed, it may collect browsing and Usage Data in the pages where it is installed, even if the Users do not actively use the service.

Mavenoid

Mavenoid will collect and process the User's contact information regarding service requests and statistical usage information for providing the customer support function for the User upon the User's request and for obtaining anonymised statistics regarding the usage of Mavenoid's communication channels. The extensive Privacy Policy for Mavenoid can be found at https://www.mavenoid.com/en/privacy-policy/.

This use of information is optional and will only take place in the event of the User's explicit consent in the application.

Location-based interactions

Geolocation (ÄIKE)

ÄIKE 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 authorization has been provided, the User's location data may be tracked by ÄIKE.

Personal Data processed: geographic position.

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.

Firebase Cloud Messaging (Google Ireland Limited)

Firebase Cloud Messaging is a message sending service provided by Google Ireland Limited. Firebase Cloud Messaging 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: Belgium - Privacy Policy; Germany - Privacy Policy.

Platform services and hosting

These services have the purpose of hosting and running key components of ÄIKE, therefore allowing the provision of ÄIKE 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.

Apple App Store (Apple Inc.)

ÄIKE 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 ÄIKE. 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 <u>this page</u>.

Personal Data processed: Usage Data.

Place of processing: United States - Privacy Policy.

Google Play Store (Google Ireland Limited)

ÄIKE 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 <u>this page</u>.

Personal Data processed: Usage Data.

Place of processing: Ireland - Privacy Policy.

Registration and authentication

By registering or authenticating, Users allow ÄIKE 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, ÄIKE 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.

Firebase Authentication (Google Ireland Limited)

Firebase Authentication is a registration and authentication service provided by Google Ireland Limited. To simplify the registration and authentication process, Firebase Authentication can make use of third-party identity providers and save the information on its platform.

Personal Data processed: email address; first name; last name; password; phone number; profile picture.

Place of processing: Ireland - Privacy Policy.

Google OAuth (Google Ireland Limited)

Google OAuth is a registration and authentication service provided by Google Ireland Limited and is connected to the Google network.

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

Place of processing: Ireland - Privacy Policy.

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: email address; first name; last name; User ID.

Place of processing: United States - Privacy Policy.

Social features

Firebase Dynamic Links (Google Ireland Limited)

Firebase Dynamic Links is a social feature provided by Google Ireland Limited. Dynamic Links are tracked within Firebase or Google Analytics for Firebase, which informs the Owner about the details of the User journey to and within ÄIKE.

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

Place of processing: Ireland - Privacy Policy.

SPAM protection

This type of service analyzes the traffic of ÄIKE, potentially containing Users' Personal Data, with the purpose of filtering it from parts of traffic, messages and content that are recognized as SPAM.

Google reCAPTCHA (Google Ireland Limited)

Google reCAPTCHA is a SPAM protection service provided by Google Ireland Limited. The use of reCAPTCHA is subject to the Google <u>privacy policy</u> and <u>terms of use</u>.

Personal Data processed: answers to questions; clicks; keypress events; motion sensor events; mouse movements; scroll position; touch events; Tracker; Usage Data.

Place of processing: Ireland - Privacy Policy.

Further information about the processing of Personal Data

Equal protection of User Data

ÄIKE shares User Data only with third parties carefully selected to ensure that they provide the same or equal protection of User Data as stated in this privacy policy and requested by applicable data protection laws. Further information on data processing and privacy practices by third parties can be found in their respective privacy policies.

Push notifications

ÄIKE 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 ÄIKE, some or all of the apps on the particular device.

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

Push notifications based on the User's geographic location

ÄIKE may use the User's geographic location to send push notifications for 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 changing those settings for some or all of the apps on the particular device.

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

Push notifications for direct marketing

ÄIKE may send push notifications to the User for the purpose of direct marketing (to propose services and products provided by third parties or unrelated to the product or service provided by ÄIKE).

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 changing those settings for ÄIKE or all of the apps on the particular device.

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

Besides applicable device settings, the User may also make use of the rights described under User rights in the relevant section of this privacy policy.

User identification via a universally unique identifier (UUID)

ÄIKE may track Users by storing a so-called universally unique identifier (or short UUID) for analytics purposes or for storing Users' preferences. This identifier is generated upon installation of this Application, it persists between Application launches and updates, but it is lost when the User deletes the Application. A reinstall generates a new UUID.

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 precontractual 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 ÄIKE 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, ÄIKE 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, ÄIKE and any third-party services may collect files that record interaction with ÄIKE (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 ÄIKE 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 ÄIKE (or third-party services employed in ÄIKE), which can include: the IP addresses or domain names of the computers utilized by the Users who use ÄIKE, 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 ÄIKE 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 ÄIKE. The Data Controller, unless otherwise specified, is the Owner of ÄIKE.

ÄIKE (or this Application)

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

Service

The service provided by ÄIKE 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 ÄIKE, if not stated otherwise within this document.

Latest update: August 25, 2023