

## PRIVACY POLICY

This Privacy Policy describes and explains how Infomir SA collects, uses and otherwise processes Personal data of our Whooshi app users (also refers to as "You", "Your"). When we refer to "Infomir SA", "we", "our" or "us" in this document, we mean the company Infomir SA, which acts as a controller of the personal data that is being collected from You. We specify our contact details at the end of this Privacy Policy.

We pay Your attention, that the provisions of this Privacy Policy do not apply to third party's online resources to which our Whooshi app may link, where Infomir SA does not control the content or the privacy policy of such resources.

### WHAT PERSONAL DATA WE MAY COLLECT AND HOW

#### WE COLLECT YOUR PERSONAL DATA

Infomir SA DOES NOT collect and never ask You to provide Your sensitive personal data. We only process Your personal data with Your knowledge and to the extent that is actually needed to achieve the processing purposes outlined below. The personal data that Infomir SA may collect and further process, as well as the ways of collection includes:

1. The data You provide us when You contact with us:

- contact details: name, email.

2. Automatically collected data: IP address; device type; operating system type; operating system version; data about the device's location; crash reports; links You click and other behavioral data with regard to Your use of our Whooshi app. We may use third-party services, that collect, monitor and analyse this type of information in order to increase the functionality of our services. When first entering our Whooshi app, we request Your acceptance for using analytic services.

#### THE LEGAL GROUND AND PURPOSES OF COLLECTING AND PROCESSING USER'S PERSONAL DATA

Infomir SA processes Your personal data on a lawful basis pursuant to Infomir SA legitimate interests as follows:

- contact details, such as name and email address, are required for:
  - communication with You;
  - direct marketing, unless You have objected to the use of Your personal data for this purpose;
  - protection against fraud, scams.
- information concerning the type of Your mobile device, IP address of your computer or mobile device, type of operating system, operating system version is required for:
  - identifying the inter-operability of our Whooshi app with Your mobile device.
- data about links You click and other behavioural data with regard to Your usage of our Whooshi app is necessary for:
  - improving the quality of our services;
  - marketing, research and analytical purposes to make our Whooshi app user-friendly;

- understanding the relevance of our Whooshi app functionality and Your need in respect of our services.

In addition, Infomir SA may also use Your personal data as follows:

- providing customer and/or operational support;
- exercising our commitments arising from our relations with You and relating to the usage of our Whooshi app.

## MAIN PROCESSING ACTIONS WITH YOUR PERSONAL DATA

Infomir SA may process Your personal data mostly by way of collection, storing, recording and structuring. We have implemented and maintain appropriate technical and organisational measures in order to protect against the loss, misuse and alteration of the personal data, and also to prevent personal data from being accessed by unauthorised persons. All Your personal data is stored on secure servers. We shall not sell Your personally identifiable data to any third parties for their own direct marketing use.

## YOUR RIGHTS WITH RESPECT TO YOUR PERSONAL DATA

### *a) Access to Your personal data.*

You have a right at any time to request confirmation as to whether or not Your personal data are being processed, as well as clarifying the basis and purposes of processing. If Your Personal data are being processed, You may request its copy in a machine-readable form.

### *b) Rectification of Your personal data.*

If You discover the incorrectness of Your personal data as well as necessity of its amending necessary for receiving the services provided through our Whooshi app, You may contact us immediately for making required rectification.

### *c) Erasure of Your personal data.*

You may exercise the right to request the erasure of Your personal data if:

- the personal data is no longer necessary for the purposes which Infomir SA originally collected or processed it for;
- Your personal data were provided by third parties without Your knowledge and consent;
- there is no overriding legitimate interest to continue the processing of Your personal data;
- Your personal data is used only for direct marketing purposes, and You object to such processing;
- it is necessary to comply with a legal request or legal obligation.

### *d) Object to processing Your personal data.*

You may request to cease processing of Your personal data if:

- there is no overriding legitimate interest to continue the processing of Your personal data;
- Your personal data is used only for direct marketing purposes and You object to such processing;
- it's necessary to comply with a legal request or legal obligation.

*e) Appeal to a corresponding supervisory authority.*

If You consider that we permitted any negligence with respect to collecting or processing Your personal data, You have a right to lodge a complaint to a corresponding supervisory authority.

*f) Be aware of any correction or erasure of Your personal data, restriction of processing, and recipients of your personal data; and*

*g) Not to be subject to a decision based solely on automated processing.* You have the right to be free from decisions based solely on automated processing of your personal data, including profiling, that affect you.

You may contact us at any time via e-mail [info@whooshi.me](mailto:info@whooshi.me) if You have any questions, requests or suggestions dealing with Your rights under this Privacy Policy.

#### PERIOD OF PERSONAL DATA PROCESSING

Processing of Your personal data is carried out for the limited period until:

- the personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- receiving Your request concerning erasure of Your personal data, if applicable;
- we discover that minors provided their personal data without corresponding parental or guardian consent, or data relating to such minors is provided to us by third parties.

If we can use Your personal data as the evidence of fraud, or breach of provisions of our Whooshi app Terms of Use, we may process such personal data during the limitation period under applicable law.

#### HOW WE SHARE INFORMATION WE COLLECT

In view of the provisions of current legislation, Infomir SA may share Your personal data with the following third parties:

- to our employees responsible for the maintenance of our Whooshi app;
- to the corresponding service providers where applicable in order to assist us with the services that You have requested from us, as well as to meet our commitments arising from our relations with You and relating to the usage of our Whooshi app. In this case they are obliged to provide you with an adequate level of personal data protection;
- to the persons designated by You as authorised to give instructions on Your behalf;
- to the relevant government regulators, public authorities, judicial bodies or law enforcement agencies to meet legal requirements, including complying with court orders, valid discovery requests etc. or to comply with any laws, rules, guidelines and regulations imposed by any governmental authority;
- to the corresponding law enforcement agencies in order to investigate, eliminate and/or prevent offences;
- to our affiliates, successors and assigns on the basis of legitimate interests in the course of our normal business activities. We shall take all steps reasonably necessary to ensure that relevant appropriate

safeguards were taken for treating your personal data securely. We will inform You of this in advance and ensure that your personal information is secure.

Infomir SA may also generally disclose Your data in an anonymised format by taking all reasonable steps to ensure that such data does not contain Your personally identifying information.

## ANALYTICS SERVICES

We use AppsFlyer, a mobile analytics service of AppsFlyer Ltd., located at 14 Maskit St. Herzliya, Israel (State of Israel is recognized by EU as having adequate protection for personal data). AppsFlyer is exposed to the following data: unique identifiers and technical data, such as IP address, or Android ID (in Android devices); technical data regarding your operating system, device attributes and settings; the downloads and installations of our Whooshi app, and your other interactions with our Whooshi app (including, in-app clicks, engagement time etc.). The use of this data allows us to analyze and improve our Whooshi app. To learn more what data AppsFlyer collects and how AppsFlyer collects data, as well as to familiarize Yourself with the privacy policy of AppsFlyer, use the link <https://www.privacyshield.gov/participant?id=a2zt0000000GnUZAA0&status=Active>.

You can always opt out of being included in AppsFlyer analytics, following the link: <https://www.appsflyer.com/optout>. If you opt-out of AppsFlyer, AppsFlyer will stop tracking data for the device going forward. The AppsFlyer Analytics tracking will stop across all applications.

## CHILD'S AND ADOLESCENT'S PRIVACY

The protection of personal data of children and adolescents is of particular concern to Infomir SA. If You are a minor under the legislation of Your residence, You have to receive a permission from Your parents or guardians to provide us Your personal and other data according to this Privacy Policy, as well as applying the provisions of this Privacy Policy to You.

In some cases, You have to provide a verifiable parental or guardian consent to provide us Your personal and other data according to this Privacy Policy, as well as applying the provisions of this Privacy Policy to You, namely:

- if You are a resident of EU or EEA country and Your age is under 16; or
- if You are a resident of the USA and Your age is under 13.

You may contact via e-mail: [info@whooshi.me](mailto:info@whooshi.me) with a person who is liable for processing the personal and other data collected from children and adolescents, as well as information concerning the verifiable parental consent from parents or guardians.

In addition to the general list of personal data, that we collect and process, we kindly ask where applicable to provide us parents or guardians contact details (names, surnames, e-mail) to contact with parent or guardian for receiving a verifiable parental or guardian consent to collect and process private and other data about their child because of his Whooshi app usage, as well as applying the provisions of this Privacy Policy to their child.

Infomir SA will provide the parents or guardians with:

- notice of types of personal data being collected from the child for contact with parent or guardian;
- the opportunity to stop to any further collection and processing of child's information;
- the opportunity to prohibit any further collection and processing of child's information;
- the opportunity to request deletion of child's personal data;
- the opportunity to provide their consent to collect and process child's personal data;

- the opportunity to provide their consent to apply amendments to this Privacy Policy with respect to their child.

If You, as a parent or guardian, discover that Your child or adolescent provided a false information concerning permission of collection and processing his personal and other data, inform us immediately via e-mail [info@whooshi.me](mailto:info@whooshi.me) for deleting such data.

In any case we do not knowingly collect, use and otherwise process personal and other data from minors and thereby shall not be liable for collection and further processing of the above-mentioned information. We will delete immediately such data in case of discovering that fact.

#### UPDATES OF PRIVACY POLICY

We reserve a right to update the text of this Privacy Policy by making alterations of its provisions and/or amending them by new provisions and or deleting the existing provisions, and/or changing them in any other way at any time. The effective date of its current version You may find at the end of the document. We shall notice You about the entry into force of new version of this Privacy Policy.

#### CONTACT DETAILS:

If you have any questions or complaints regarding this Privacy Policy or you want to exercise Your data protection related rights, you can communicate with us at the email address [info@whooshi.me](mailto:info@whooshi.me) or by post at the addresses below:

**Controller:**

Infomir SA  
rue du Vuache 1  
1201 Geneva  
Switzerland

**EU representative:**

Infomir OÜ  
Rävala pst. 8, kabinet A312  
Tallinn 10143  
Estonia

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