

# **Privacy policy**

Go Jauntly is a limited liability company registered in England and Wales under registration number 10308088. Our principal place of business is at 54-58 Tanner St London, SE1 3PH, United Kingdom

We are registered as a data controller with the UK Information Commissioner's Office. Our Data Protection Registration Number is ZA214058.

We regularly review our compliance with our Privacy Policy. This update includes additional information regarding the new EU data protection laws, General Data Protection Regulation (GDPR) which is effective from May 25th, 2018.

We are committed to safeguarding the privacy of our Website visitors and App Users. Please read this Privacy Policy carefully to understand how we treat your personal information and data. Please note any capitalised word herein denotes a defined term, which is as defined in our <u>Terms of Use</u> (please peruse the definition here).

We encourage you to read this Privacy Policy as well as our Terms of Use. By using Go Jauntly's App and Website Services, you are agreeing to all the terms herein and that of our <u>Terms of Use</u> and that they shall be legally binding between Go Jauntly and you. The provision herein as well as our <u>Terms of Use</u> shall govern your access to and use of our Services.

### 1. Information We Collect, Store or Use

a. Usernames, email addresses, passwords, full name, photos, comments, social media handles (if used to log in), physical activity and approximate location. Data is stored securely on AWS, a secure server and Cognito and can only be accessed through AWS credentials.

b. Whilst viewing our walking routes we process "Location Data" on your device to measure your walk progress, we do not track every step. With your permission, we also use your anonymised location to suggest better content to you to help you get out on more walks. "Location Data" through your device means either approximate location or, with your consent, precise location when you use the Go Jauntly app. We use this data to surface Walks nearby within our Services, show pollution and/or weather information



to develop, enhance, and improve Services and the walking experience. For example, some users are not near any existing in-app walks, by using our analytics platform, Firebase, we can see the most popular places in need of specially curated walks for our users.

c. You may choose to enable, log into, or sign on to the Services through social networking services, such as Facebook. When you connect using your SNS accounts, we may collect Personal Data that you have provided to that SNS. For example, when you log in with your Facebook credentials, with your consent, we may collect Personal Data from your Facebook profile that is permitted under Facebook's Terms of Use - such as your email address, profile picture, and friend list. Whilst we do not currently, in the future we may use this data to provide, enhance, and personalize the Services (e.g., to help connect you with or suggest friends within our Services). If you do not want to provide us with this data, you need to adjust the privacy settings on your SNS account. If you accept in-app Push Notifications, we collect a token which Apple provides us and pass that to the server. Apple has the log of who's token belongs to which device. You can change your notification settings at any time on your device.

d. You may choose to share your own walking routes to share with the community by uploading your original pictures and supporting information about the walking route, this is optional. By giving Go Jauntly access to your camera roll, you provide the app access to view your photos and videos in order for you to pick the photos that you wish to share. Please note that we only use images you explicitly select to appear in the walk or as your profile image. Once an image is selected, they are copied and compressed on your device and then uploaded to Go Jauntly's server where they'll be resized and cropped to fit different devices and use cases. We do not automatically take images from your camera roll. The location of the image is taken from the images geo-tag, which is an approximate location of where the image was taken as per your device settings. Please note that the images appear online as soon as you publish your walk so we recommend that you exercise caution and only share imagery or information that you are happy or have permission to share. If you decide to, you may delete your own walk within the "My Walks" section. It should be noted again that when you sign up to Go Jauntly, you create a personal profile. Your username, shared walks and saved walks may be publicly visible in the future. We recommend that you choose your username wisely. If you specify an optional location on your profile or if a social network has provided this as part of your registration, this may also be visible. Location is editable at any time.



e.You may choose to upload text, images, and location to the Nature Notes feature. Images are compressed on your device and uploaded to Go Jauntly's database along with the associated text and image location data. We need to store this information in case you buy a new device and still want to retrieve your Nature Notes. Please note that images in our database may be shared with app users as part of our future Services so we recommend that you exercise caution and only share imagery that you are happy or have permission to share. When you delete a previously uploaded Nature Note (Image and/or Text), we immediately remove it from our database and delete any associated files.

f. Information you provide when you fill in any forms on our website http://www.gojauntly.com/ ("Website", or "our Website"). This includes, amongst others, information that you provide when you register to use our Website, create a profile, download our app ("App", or, "our App"), subscribe to our Services, post material (such as routes, planner etc), and/or when registering for premium Services. Please be advised that when you post material or create a profile or when you upload (subsequently edit) User Generated Content on our Website and App, it is particularly essential for you to adhere to and understand our Privacy Policy and <u>Terms of Use</u>. You shall respect the privacy of others and that you shall not post unsuitable or infringing materials. Please direct queries to us if you have questions on this <u>hi@gojauntly.com</u>.

g. If you contact us (for example, if you report an issue or problem with our Website or App) via email, we may keep a record of that correspondence for up to 30 days;

h. We may request for you to complete surveys or provide quality ratings for research and/or development purposes (which you do not have to respond to);

i. We may also automatically collect other non-personally identifiable information each time you visit our Website, including:

I. technical information, including the IP (Internet Protocol) address used to connect your computer to the internet, browser type and version, device type and screen size.

II. information about your visit, including the full URL (Uniform Resource Locator), page response times, download errors, and length of visits to certain pages.



j. We do not store debit/credit card details on our Website, App, database or servers. Please be advised that we use the iTunes Connect Store and Google Play Store, as third party providers to process payment(s) for any chargeable Services. Such third party providers may provide you with an option whether you wish for your card details to be stored for your convenience. It is important for you to read their terms of use;

k. Please be advised that we never knowingly collect data from anyone under 13; If you become aware that a child has provided us with Personal Data without parental consent, please contact us at <u>hi@gojauntly.com</u> and we will take steps to remove the data and cancel the child's account.

I. Please be advised that before you provide to us any personal information of another person, you must obtain that person's consent.

### 2. What We Do with Your Information

a. Any information we collect from you, or that you provide to us is for the purpose of understanding your needs and providing better services to all of our Website and App Users;

b. We may periodically send promotional emails about our new Services, special offers from us or third parties or other information, which we think you may find interesting, using the email address that you have provided. If you wish to receive these promotional marketing emails, please indicate so by ticking the appropriate box provided on our Website and/or App. Please note that regardless of your email settings, we may send you notifications pertaining to the performance of our Services, such as revision of this Privacy Policy or Terms of Use or other formal communications relating to products or Services you have purchased or used.

c. We are committed to ensure that your information is secured. In order to prevent unauthorised access or disclosure, we use Security Sockets Layer (SSL) encryption technology to encrypt sensitive information (e.g. login credentials). We follow generally accepted standards to protect your data from cross-site scripting (XSS) vulnerabilities.

d. In your best interest, you should not share your login credentials with anyone.



e. We use non-personally identifiable information collected from you to administer our Website and App, and for technical purposes, including troubleshooting, enhancing our App & Services, data analysis, testing, research, statistical and survey purposes.

f. We use Branch, Firebase, and Crashlytics as tracking tools within the app. These technologies may be used in analysing trends, app performance, administering the app, tracking users' movements around the app only, and to gather basic anonymised demographic information about our user base as a whole. We may receive reports based on the use of these technologies by such companies on an individual as well as aggregated basis. Separately, users also have the option to opt-in to iOS Analytics which will share app performance and some user behaviour with Apple or Google Analytics (Android) which will share app performance and some user behaviour with Google. This is a part of the user's phone settings and is not specific to the Go Jauntly App.

g. Users may choose to sign up to Challenges. These are opt-in only. If you sign-up to the Challenges and consent to sharing Apple HealthKit or Google Fit we will be able to monitor and verify forms of eligible movement in relation to the Challenges and Services. You may turn this feature on or off without impacting on the Services we provide as Users can manually add physical activity content instead. Only physical activity data relevant to a challenge is retained, any activity outside of a challenge's requirements is discarded.

h. For our transactional emails and optional marketing newsletter, we use third-party tools called Sendy and Mailchimp to store information.

i. We may collect your Personal Information when you engage with our online communities. This includes when you interact with our social media pages, submit content, leave reviews, or otherwise enter information into comment fields, blogs, message boards, events. We recommend that you exercise care in deciding what information and content you wish to disclose.



### 3. Sharing of Your Information

a. We may share non-personally identifiable information with our affiliates and partners in order to provide and/or improve our Services. We may also share non-personally identifiable Challenge achievements with Affiliates, partners and third parties in order to issue prizes, results, or achievement summaries in order to provide our Services. We may disclose your personal information on a confidential basis, to any member of our Affiliate, employees, professional advisers, consultants and/or valid representatives, in so far as reasonably necessary, and for the purposes of performing our obligations and providing you with our Services;

b. We may also disclose your personal information to third parties:

I. if we sell the ownership of our company, business or assets, or, buy any business or assets, in which case we may disclose your personal information, on a confidential basis, to the prospective buyer or seller, respectively; in which case we will give the affected Users notice before any personal information is transferred (or becomes subject to a different privacy policy);

II. if we are under a duty to disclose your personal information in order to comply with our legal obligation, or, if required under a court order;

III. in order to enforce or exercise our rights (statutory, contractually or otherwise);

IV. in order to implement our Policy and <u>Terms of Use</u> (such as in relation to an investigation of potential breach of our Policy and/or <u>Terms of Use</u>);

V. in order to protect the rights, property, or safety of Go Jauntly, our Members, Users or the public, as required and permitted by law.

c. Your profile may be viewed by Members of our Website or App. It is your responsibility to ensure your credentials are secured and your profile is truthful and kept up to date; and, to ensure any Content you post is in compliance with law, our Policy and <u>Terms of Use</u>;

d. We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so.



### 4. Where We Store Your Information

Any data we collect from you may be transferred to, and stored at a destination within the UK and the EU. It may also be processed by staff (ours or third parties') within those jurisdictions, in order to fulfil your order and perform our Services. By submitting your personal data, you are agreeing to this transfer, storing and processing. Data is stored securely on AWS, a secure database and Cognito and can only be accessed through AWS credentials. We will take all steps that are reasonably necessary in order to ensure that your data is being treated securely and in accordance with this Policy.

### 5. How We Use Cookies

A cookie is a small file placed onto your device that enables our Website, App and our Services features and functionality. For example, cookies can enable us to identify your device and secure your access to the Website. Cookies also allow the Site to remember information about your browsing on the Website for a while and to recognise you the next time you visit the Site. All this allows us to give you the opportunity to use the Website comfortably and to make the Website even more user-friendly.

a. We use cookies for the following main purposes:

- To ensure efficient and safe functioning of the Website, App and our Services. We use cookies to enable and support our security features, and to help us detect malicious activity on our Website, App and our Services.
- To analyze your habits so that the functioning of the Website, App and our Services would be convenient, efficient and would conform to your needs and expectations.
- To measure the flows of the information and data being sent to our Website, App and our Services. We use the cookies for accumulation of statistical data about the number of users of the Website and their use of the Website.

b. Strictly required or necessary cookies - We use cookies to remember and store users' settings, preferences and authentication. In particular, we use cookies in and in respect of, amongst others: account registration, login features, newsletter subscriptions, and form submissions, and any other log-in based services;



c. Users can control the use of cookies at the individual website browser level. Disabling cookies may prevent Users from taking full advantage of the usability of our Website, App and our Services; You can disable browser cookies by changing your browser settings to reject cookies. Detailed information on how to do this can be found at <u>https://allaboutcookies.org/how-to-manage-cookies</u>. If you refuse or block the cookies or other similar technologies, some functions of the Website may not operate correctly.

We draw your attention that necessary cookies are critical for functioning of our Site, and in case of your objections, some features of the Website may not work or may not work properly.

d. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit the website: <u>http://www.allaboutcookies.org</u>

e. In most cases cookies cannot be saved to your device without your consent. When you first enter any of our websites, you will be shown a cookie notice. This notice informs the user that our site uses cookies. When you click 'close' on the banner, we deem you to have consented to non-essential cookies unless you have disabled them using your browser settings.

# 6. Third Parties' Cookies

a. Third parties that may be hyperlinked on our Website or App, such as Google Analytics and Squarespace Analytics, may also use cookies, over which we have NO control or access. They are independent from and have no relation to us. Please read our <u>Terms of Use</u> regarding our policy on third parties' websites;

b. We use Google Analytics, a web analysis service provided by Google, Inc (hereinafter referred to as "Google"). The information collected by Google Analytics is transmitted to and stored with Google. Google may transmit the information collected by Google Analytics to the third parties as required by the law or when those third parties process the information in the name of Google. We recommend consulting the Google Privacy and Cookies Policy on a separate and regular basis.

c. We may also from time to time use the capabilities and services of Squarespace Analytics (<u>https://www.squarespace.com/</u>), a built-in analytics platform that gives insight how our Website and/or App is performing. If you wish to learn more about



Squarespace Analytics please visit <u>https://support.squarespace.com/hc/en-us/articles/206544167</u>

### 7. Data Retention and Deletion

We will retain your Personal Data for as long as you maintain an account or as otherwise necessary to provide you the Services. We will also retain your Personal Data as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Where we no longer need to process your Personal Data for the purposes set out in this Privacy Policy, we will delete your Personal Data from our systems.

Where permissible, we will also delete your Personal Data upon your request, the request will be actioned within 30 days. If you have any specific requests regarding your data please email our support team at <u>hi@gojauntly.com</u>

### 8. Other Websites and Others

a. Our Website may contain links to other websites of interest. These third parties' websites may have their own privacy policies, which are entirely independent from and have no relation to us.

b. Please read our Terms of Use carefully, which amongst others contain our policy and disclaimer in respect of these third parties' websites.

### 9. How to Contact Us

a. The Website and App are owned by Go Jauntly and operated by Go Jauntly;

b. For customer services, general questions, to delete your account and data or technical support, please contact <u>hi@gojauntly.com</u>



# **10. Changes to Our Privacy Policy**

We reserve the right to make changes or variations to our Privacy Policy, from time to time. Any changes to our Privacy Policy shall apply to the use of our Website and App from the time of publication of the revised policy on our Website and/or App.