

## Privacy Statement (English)

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### 1. Introduction

Your privacy matters to us. In this Privacy Policy, you will find more information on what data we collect, why we collect it and how you can manage your data.

We will only use the data we have collected for the purposes specified in this Privacy Policy and not for any other purpose, unless the further use of your data is compatible with the purpose for which the personal data are initially collected.

### 2. Users and Emergency Contacts

We use the following definitions:

- User: the user of the app
- Emergency contact: the person whose information has been added by the User and who will be alerted when the User presses the emergency button.

### 3. The information that we collect

Personal data are data that can be used to identify you as a person. We collect information in the following ways:

#### User

1. Information that you give us:
  - Your account name and password
  - Your email address
  - Your mobile phone number
2. Information that we collect:
  - Your geographical location when the SOS button on the bag is pushed. Once you push the green button in the app, we will no longer track your geographical location.

## Emergency contact

1. Information that you give us if you download the app:
  - Your account name and password
  - Your mobile phone number
  - Your email address
  - SOS messages
2. Information that you give us if you do not download the app but are selected by the user for emergency calls or text messages:
  - Your mobile phone number

## **4. What do we need it for?**

We may collect and further process your personal information for the following purposes:

### User

- To allow you to make use of our services, we may request your account name and password, your email address and your mobile phone number.
- Your mobile phone number and email address may be used to send you a new password in case you forget your password and would like to retrieve it.
- Your geographical location will be used to send your Emergency Contact your location, only if and when you press the SOS button.
- Your SOS messages are stored on the server and are saved for 7 days to allow us to comply with law enforcement requests, if any.
- Your mobile phone number will be used to connect to the server to set up an emergency call or emergency text message.

### Emergency contact

- Your phone number may be used so that the User can alert you via a call or text message in case of an emergency
- Your email address may be used so that the User can alert you via the app in case of an emergency
- To allow you to make use of our services, we may request your account name and password, your email address and your mobile phone number.
- Your mobile phone number and email address may be used to send you a new password in case you forget your password and would like to retrieve it.

We will ask your permission before using your personal data for purposes other than those listed above unless the further use of your data is compatible with the purpose for which the personal data are initially collected. We will inform you of, and, if necessary ask your

permission for, any changes in the use of your personal data. There is also the possibility that we would need to supply your personal data to the authorities or other third parties, for example in case of legal obligations.

We will not use your data for decisions based solely on automated processing, such as profiling.

## **5. Lawful bases for processing**

### Consent to use your personal data

Before using our app, you have given us consent to collect and use your personal data to create an account. You can withdraw your consent at all times. By revoking your consent, we will stop processing your personal data. If you revoke your consent, this means that you can no longer use our app.

### Legitimate interests

We may process your personal data for the purposes of our legitimate interests, provided that such processing does not outweigh your rights and freedoms.

As part of our service, we may process the personal data of the Emergency Contact and the User in order to enable us to connect the User and the Emergency Contact in case of an emergency.

You have the right to object to this processing if you wish. If so please contact us. Please note that if you object this may affect our ability to carry out the tasks above for your benefit.

## **6. Minors providing personal data**

We do not specifically offer services to minors. Persons below the age of 18 may only provide personal data to us if they have permission from their parents or guardians.

## **7. We do not keep your personal data longer than necessary**

### User

We need your personal data to offer you access to the app and to connect you with your Emergency Contact. We only keep your personal data as long as your account is active. When you deactivate your account, we will delete your personal data, unless we need to retain your data to comply with legal obligations (including law enforcement requests).

Please note that deleting the app is not the same as deactivating your account. If you wish to deactivate your account, please contact our Customer Service to request deactivation. After request your account is deactivated within 7 days.

Your SOS messages are stored for 7 days unless we need to store these messages for a longer period of time to comply with legal

obligations (including law enforcement requests). You can delete SOS messages from the app, the removal from the server will occur within 7 days as mentioned in point 4 of this statement.

### Emergency Contact

We need your personal data to offer you access to the app, if you choose to download it. We only keep your personal data as long as your account is active. When you deactivate your account, we will delete your personal data, unless we need to retain your data to comply with legal obligations (including law enforcement requests).

Please note that deleting the app is not the same as deactivating your account. If you wish to deactivate your account, please contact our Customer Service.

When you delete your account in the app the user will be notified via the app. However, if you deactivate your account via the Customer Service, then the User will NOT receive a notification.

### Inactive account

You always have the possibility to deactivate your account. If your account is inactive for a period of 12 months, the app will send a notification to enquire if you would like to continue to use our services. If you inform us that you have no use for the app anymore, we will, at your request, deactivate your account.

## **8. We protect your personal data**

We protect your personal data. We keep the personal information we collect about you in secure environments. We make sure that third parties that have access to your personal data meet our security requirements. We have Data Processing Agreements with external parties that have access to your personal data.

We cannot guarantee that your data may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards. However, we take all reasonable steps to ensure that your data is kept private, held securely and complies with legal requirements.

## **9. Where your data is processed**

We process your data outside the European Union, in our office in China. We do not transfer your data to other countries outside the European Union, unless as specified below.

We may transfer your data to Twilio Inc., located in the United States of America. Twilio is a cloud communications platform that we use for our SMS and emergency call settings. Twilio Inc. is included in the list of companies certified under the EU-US Privacy Shield Framework.

The server where your personal data are stored is located within the European Union.

## **10. Who has access to your personal data?**

We will share certain information of the User with the Emergency Contact and the other way around to be able to connect the two of you via the app in case of an emergency. The location of the User is only shared with the Emergency Contact when the SOS button is pushed by the User.

We work together with the following external parties who have access to your personal data:

- Amazon Web Services, located in Frankfurt, Germany for storing the data on the Cloud
- Twilio, Inc. (375 Beale Street, Suite 300, San Francisco, CA 94105, USA ) for our SMS and emergency call settings

We have entered into Data Processing Agreements with parties that process your personal data on our behalf, to protect your data.

### Location services

To access your location, we have integrated Web Mapping Services into the app. Depending on your mobile phone's operating system and your location, one of the following Web Mapping Services will be used. For iOS and for Android: Google Maps; for Android phones in China: Baidu Maps. These companies may have access to your location. We do not share your personal data with these companies. Please visit the privacy policy of [Google Maps](#) and [Baidu Maps](#) for more information on what happens to your personal data when you use their services.

### Technical support

For technical support you may contact our Shanghai location, Xindao Shanghai co. Ltd. The contact details are available in point 14 of this statement.

### Public authorities

We may be required, by law, legal process, litigation and/or requests from public and governmental authorities to disclose your personal data.

## **11. What are your rights and how can you manage your data?**

Privacy laws grant you certain rights. If the General Data Protection Regulation (GDPR) is applicable, these rights are mentioned in articles 12 – 23 of the GDPR.

Your rights are:

- The right to ask us for access to your personal data (access)
- The right to ask us to change or correct your personal data (rectification)
- The right to ask us to delete your personal data (erasure/right to be forgotten)

- The right to ask us to restrict the processing of your personal data (restriction)
- If we have processed your data based on our legitimate interests: the right to object to the (further) processing of your personal data (objection)
- If we have processed your data based on your consent: the right to ask us to transfer your personal data to another controller or to yourself (data portability)

If you would like to invoke your rights, please contact us at: Xindao Shanghai Customer Service Department [cathy@xindao.com](mailto:cathy@xindao.com).

## **12. Changes to our policy**

Our Privacy Policy may change from time to time to reflect changes to our product or changes in the applicable privacy laws. We will post any changes to our Privacy Policy on this page. We will notify you via the app of changes to our Privacy Policy that may affect you.

## **13. Objection and complaints**

We have collected personal information from you on the basis of our legitimate interests [see point 5 of this privacy statement]. You have the right to object to the processing of your personal data on this basis at any time. In that case, Xindao will no longer process your personal data, unless we have compelling legitimate grounds for the processing which override your interest to stop the processing.

What if you do not agree with a decision that we make, for example if we decide not to delete your personal data?

- Contact us: please first contact us so that we can resolve the issue together. You will find our contact information below.
- Lodge a complaint: If you reside in the European Union, you have the right to lodge a complaint at the supervisory authority of the Member State that you live in. If you do not reside in the European Union, you have the right to lodge a complaint at the Dutch supervisory authority, the 'Autoriteit Persoonsgegevens' <https://www.autoriteitpersoonsgegevens.nl/nl>
- Ask for mediation: you have the right to ask the Dutch supervisory authority to mediate between us to resolve the issue.
- Go to court: you have the right to bring a case before the competent court in the Netherlands, or, if you reside in another EU member state, to bring a case before the competent court in your member state.

## **14. Contact us**

Xindao Shanghai co. Ltd. is responsible for the processing of your personal data and act as the controller. Our contact details are [cathy@xindao.com](mailto:cathy@xindao.com).

Xindao B.V. acts as our representative in the EU. If you have any questions or comments regarding (our use of) your personal data, please contact us at [customersupport@xd-design.com](mailto:customersupport@xd-design.com)