

Privacy Policy – Hidden Trax

Thank you for using Hidden Trax – walk like a local!

This Privacy Policy describes the ways Hidden Trax collects, uses, processes, and discloses your personal information across the Hidden Trax Platform and the rights and options available to you with respect to your information. Your use of our services is conditioned upon acceptance of our Terms of Use and this Privacy Policy. This Privacy Policy lists our current policies, but, as noted below, this Privacy Policy may be modified from time to time at our discretion.

If you see an undefined term in this Privacy Policy (such as “Platform”, “Service”, “App Data”, “Registration Data”), it has the same definition as outlined in our Terms of Use

When this policy mentions “Hidden Trax”, “Company”, “we,” “us,” or “our,” it refers to the Hidden Trax Limited, 7 Howe Street, Edinburgh, United Kingdom, EH3 6TE that is responsible for your information under this Privacy Policy.

1. COLLECTING INFORMATION

What information do we collect from the people that visit our website or app?

If you register to sign up for communications from us we will collect your name and email address.

To provide the Service, Hidden Trax accesses, collects, uses and stores your location information, in accordance with the Terms of Use and these Privacy Policy terms. You may revoke your consent at any time by contacting hello@hiddentrax.co and deleting the Hidden Trax Creator App and/or the Hidden Trax App from your mobile device. Please know that if you revoke your consent by contacting us or you delete or deactivate your Registered User Account, we may retain certain information as required by law or for legitimate business purposes. We may also retain cached or archived copies of information about you for a certain period.

We may also monitor, collect, use and store data (anonymous, aggregate or otherwise) regarding use patterns of the Hidden Trax App, the Hidden Trax Creator App or other elements of the Platform and/or any individuals or entities that interact with the Platform (“App Data”).

PII, App Data and any other collected information by Hidden Trax as part of the provision of the Service is hereafter collectively referred to as “Information” or “Collected Information”.

When do we collect information?

We collect PII directly from you when you subscribe to a newsletter, respond to a survey, contact us via an email or provide us with feedback on our Service, take a Tour or otherwise use the Platform.

We may also obtain certain PII from third-party sources and combine that with information we collect through our Platform.

We collect App Data (anonymous, aggregate or otherwise) at any stage after you are using the Platform. It’s also important to note that we allow third-party behavioural tracking for market research and analytics purposes.

2. USE OF INFORMATION:

How do we use your information?

We may use the Information we collect from you and the Platform in the following ways:

- To personalise your experience and to allow us to deliver the type of content and product offerings in which you are most interested.
- To improve our Service in order to better serve you.
- To allow us to better service you in responding to your customer service requests.
- To administer a contest, promotion, survey or other site feature.
- To quickly process your transactions.
- To ask for ratings and reviews of services or products.
- To follow up with them after correspondence (live chat, email or phone inquiries)

Hidden Trax is based in the United Kingdom, and the information we collect is governed by UK and EU applicable law and directives. By accessing or using the Service or otherwise providing Information to us, you consent to the processing and transfer of information in and to the UK and to be used globally.

Who is the Data Controller?

A data controller is defined in the Data Protection Act 1998 (DPA) as a person who determines the purpose and manner in which any personal data

is or going to be processed and used. This means that every business operating in the UK which holds Personal Identification Information (PII) about individuals is affected by the DPA. For the purposes of this Privacy Policy, Hidden Trax is the Data Controller and therefore be subject to data protection obligations.

3. SECURITY OF INFORMATION

How do we protect your information?

Our website, apps and servers are scanned on a regular basis for security holes and known vulnerabilities in order to make your visit to our Platform as safe as possible. We use regular Malware Scanning.

Your PII is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems, and are required to keep the information confidential. In addition, all sensitive/credit information you supply is encrypted via Secure Socket Layer (SSL) technology.

We implement a variety of security measures when a Registered User submits or accesses their information to maintain the safety of your PII.

All transactions are processed through a gateway provider and are not stored or processed on our servers.

Our responsive action, should a data breach occur?

We will notify you via in-site notification and in severe cases via email as soon as a data breach is detected. We will act immediately to rectify the situation and notify any relevant governmental and law enforcement bodies in any case of suspicion that unlawful activities have occurred.

4. SHARING OF INFORMATION

Do we share information?

As a general rule, Hidden Trax does not share user Information, such as their PII inputted into the Platform on all its elements during the registration or use of the Service, and non-personally identifiable App Data regarding use patterns of such users to any unaffiliated third parties, other than as specified below. We may however share aggregated or anonymized App Data that does not directly identify you.

Who can we share the information with?

Hidden Trax may share certain Information with vendors, consultants and other service providers who need access to such Information to carry out work on our behalf.

We may be required to disclose your PII in response to a request for information if we believe that the disclosure is necessary to comply with a law, regulation or legal request; to protect the safety of any person; to address fraud, security or technical issues; if we believe your actions are inconsistent with the spirit or language of our Terms of Use or policies; or to protect Hidden Trax's rights or property.

Hidden Trax holds the right to sell, transfer or otherwise share some or all of its assets, including the Information collected on the Platform, in connection with a merger, acquisition, reorganisation or sale of assets or in the event of bankruptcy. We will provide you with notice via an email and/or in-site communication of the transfer of your PII to the new entity.

5. COOKIES

Do we use 'cookies'?

Yes. Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the site's or service provider's systems to recognize your browser and capture and remember certain information. For instance, we use cookies to help us remember and process the items you have previously expressed interest in. They are also used to help us understand your preferences based on previous or current Platform activity, which enables us to provide you with improved Service. We also use cookies to help us compile aggregate data about Platform traffic and interaction so that we can offer better Platform experiences and tools in the future.

We use cookies to:

- Understand and save user's preferences for future visits.
- Keep track of advertisements.
- Compile aggregate data about Platform traffic and interactions in order to offer better Service and experiences and tools in the future. We may also use trusted third-party services that track this information on our behalf.

You can choose to have your desktop or mobile applications warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do

this through your browser settings. Since each browser is a little different, look at your browser's Help Menu to learn the correct way to modify your cookies.

If you turn cookies off, some of the features that make your experience on the Platform more efficient may not function properly. It won't affect the user's experience from the Tours though.

6. THIRD-PARTY LINKS

Third-party disclosure

We do not sell, trade, or otherwise transfer to outside parties your PII unless we provide users with advance notice. This does not include website hosting partners and other parties who assist us in operating the various elements of our Platform, conducting our business, or serving our users, so long as those parties agree to keep this information confidential. We may also release information when it's release is appropriate to comply with the law, enforce our site policies, or protect ours or others' rights, property or safety.

However, non-personally identifiable visitor information (App Data) may be provided to other parties for marketing, advertising, or other uses.

Third-party links

Occasionally, at our discretion, we may include or offer third-party products or services on our Platform. These third-party offerings have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked services. Nonetheless, we seek to protect the integrity of our Platform and welcome any feedback about these links.

Google

Google's advertising requirements can be summed up by Google's Advertising Principles. They are put in place to provide a positive experience for users. <https://support.google.com/adwordspolicy/answer/1316548?hl=en>

We may use Google AdSense Advertising on our website <https://hiddentrax.co>

Google, as a third-party vendor, uses cookies to serve ads on our website. Google's use of the DART cookie enables it to serve ads to our users based on previous visits to our website as well as other sites on the Internet. Users may opt-out of the use of the DART cookie by visiting the Google Ad and Content Network privacy policy.

Demographics and Interests Reporting

We, along with third-party vendors such as Google use first-party cookies (such as the Google Analytics cookies) and third-party cookies (such as the DoubleClick cookie) or other third-party identifiers together to compile data regarding user interactions with ad impressions and other ad service functions as they relate to our Platform.

Opting out:

Users can set preferences for how Google advertises to you using the Google Ad Settings page. Alternatively, you can opt out by visiting the Network Advertising Initiative Opt Out page or by using the Google Analytics Opt Out Browser add on.

7. CHANGE TO YOUR PERSONAL INFORMATION

You can change your PII by logging in to your Registered User Account or by emailing us on hello@hiddentrax.co

8. CHILDREN

We do not knowingly collect personally identifiable information from children under 13. If you are between the ages of 13 and 18, you must have your parent(s)' or legal guardian(s)' permission to use the Services. If we become aware that a child under 13 has provided us with Personal Information, we will delete such information and terminate the Registered User Account.

9. PUBLISH PRIVACY POLICY

Once this Privacy Policy is created, we will add a link to it on our home page or as a minimum and/or on the footer of the website. We will also add a link to the Privacy Policy in the relevant App Stores offering the Hidden Trax Creator App and the Hidden Trax App.

We may update or modify the Privacy Policy from time to time at our sole discretion. You will be notified of any Privacy Policy changes on our Privacy Policy page.

