

## SAFECITY

### PRIVACY POLICY

Effective Date: 3 June 2020

#### 1. INTRODUCTION

1.1. **THIS PRIVACY POLICY SETS OUT THE BASIS ON WHICH ANY PERSONAL DATA AND OTHER INFORMATION WE COLLECT FROM YOU OR OTHER SOURCES OR THAT YOU PROVIDE TO US (“INFORMATION”) WILL BE HANDLED BY US IN CONNECTION WITH YOUR ACCESS AND USE OF THE SAFECITY MOBILE APPLICATION (“THE MOBILE APPLICATION”). WE UNDERSTAND THE IMPORTANCE YOU, AS A USER OF OUR MOBILE APPLICATION, PLACE ON THE INFORMATION PROVIDED TO US, AND WE ARE COMMITTED TO PROTECTING AND RESPECTING YOUR PRIVACY. PLEASE READ THE FOLLOWING CAREFULLY TO UNDERSTAND OUR PRACTICES REGARDING YOUR INFORMATION.**

1.2. By using our Mobile Application, you agree to the handling of your Information in accordance with this Privacy Policy. References in this Privacy Policy to “we”, “our” or “us” (or similar) are references to Red Dot Foundation Global, a not-for-profit organization registered in the United States under license number EIN 82 - 1206435, with its office located at 5217 Lightning View Road, Columbia, Maryland, 21045 in the United States. References to “user” or “you” (or similar) are references to you as an individual or legal entity as the case may be.

#### 2. INFORMATION WE MAY COLLECT FROM YOU IF YOU ARE A REGISTERED USER

2.1. We may collect and process the following Information about you:

- (a) Information that you submit to the Mobile Application, including information provided at the time of registering to use our Mobile Application and other core registrations (e.g. social media logins), subscribing to our service(s), posting material or requesting further services;
- (b) Information you provide us, or that we may collect from you, when you report a problem with our Mobile Application;
- (c) a record of correspondence if you contact us;
- (d) general, aggregated, demographic and non-personal Information;
- (e) details about your location and your mobile device, including a unique identifier for your device;
- (f) details about your computer, including (where available) your IP address, operating system and browser type, as well as information about your general internet usage (e.g., by using technology that stores information on or gains access to your device, such as tracking pixels, web beacons etc.) and
- (g) any other Information we consider necessary to enhance your experience on the Mobile Application.

**3. INFORMATION WE MAY COLLECT FROM YOU IF YOU ARE REPORTING ANONYMOUSLY**

3.1 We may collect and process the following information about you.

- (a) Your age; but if you report that you are under 18, your information will be deleted from and the information you shared, except that you attempted to create a report, will not be kept as a part of our data.
- (b) Your gender;
- (c) general, aggregated, demographic and non-personal Information;
- (d) details about your location and your mobile device, including a unique identifier for your device, and any location you provide in your report;
- (e) details about your device, including (where available) your IP address, operating system and browser type,
- (f) any other Information we consider necessary to enhance your experience on the Mobile Application but only if it furthers the purposes of mapping incidents or conducting research.

**4. OUR USE OF YOUR INFORMATION**

4.1. We may use Information held about you in the following ways:

- (a) to provide you with information or services that you request from us or which we feel may be of interest to you;
- (b) to provide you with location-based services, such as search results and other personalised content;
- (c) to improve our Mobile Application and to deliver a better and more personalised service;
- (d) to ensure that content from our Mobile Application is presented in the most effective manner for you and the device you use to access our Mobile Application;
- (e) to notify you about changes to our Mobile Application; and
- (f) for any other reason which we deem necessary to enhance your experience of the Mobile Application.

**5. OUR USE OF YOUR INFORMATION IF YOU ARE REPORTING ANONYMOUSLY**

5.1 We may use Information you have provided in your report held about you in the following ways:

- (a) We use your Information to generate anonymous, de-identified data for research purposes.

- (b) We use the location information you provide to generate maps of incidents you report.

## 6. DISCLOSURE OF YOUR INFORMATION

6.1. Information about our users is an important part of our business. We share customer information only as described below and with group companies that follow practices at least as protective as those described in this Privacy Policy:

- (a) **Third Party Organisations:** We may provide third parties with your Information to provide you with information, assistance or access to events if you have indicated your interest in such information, assistance or events. We may also provide anonymous and factual reports to local law enforcement and other agencies (e.g. universities) on assault reporting relevant to their location.
- (b) **Marketing and Promotional Offers:** We may also use your Information to provide you with information about goods and services which may be of interest to you and enhance your Mobile Application experience, new features and enhancements. We may contact you via the following channels: emails, push notifications, post, telephone and in-app messages.

We may permit third parties to use your Information. For example, we may provide advertisers Information to help them reach the kind of audience they want to target and to enable us to comply with our commitments to our advertisers (e.g. by displaying their advertisements to a target audience).

- (c) **Business Transfers:** In the event that we or substantially all of our assets are acquired, customer information will be one of the transferred assets.
- (d) **Protection of Our Mobile Application and Others:** We release account and other personal information when we believe such a release is appropriate and necessary to comply with the law and law enforcement investigations and to protect the rights, property or safety of our users or others. This includes exchanging information with other companies and organisations for criminal investigations. However, this does not include selling, renting, sharing, or otherwise disclosing personally identifiable information from users for commercial purposes in violation of the commitments set forth in this Privacy Policy.
- (e) **With Your Consent:** Other than as set out above, you will receive notice when information about you might be sent to third parties, and you will have an opportunity to choose not to share the information.

6.2. Note that our Mobile Application may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data or other information to these websites.

## 7. DISCLOSURE OF YOUR INFORMATION IF YOU ARE REPORTING ANONYMOUSLY

7.1 Information about individuals that report anonymously are treated differently than information about users who access our site for other purposes. We believe that you own your Information as your source data .

- (a) When we receive your Information, we anonymize the data before we use it to generate aggregate, de-identified data for research purposes. The resulting data from this process is our data.
- (b) Using our data, we have the right to compile, collect, copy, modify, re-use and re-purpose, publish and use this data for analytical and other business purposes.
- (c) Our aggregate data is also available as open source research repository for groups that wishing to conduct a study using our data.
- (d) Any group wishing to use our data are required to register with us, request to use the data, provide a statement regarding purpose of using our data, and make assurances that they will adhere to our consent, privacy, confidentiality and data storage and security policies before they are given access to our data.

## **8. STORAGE OF YOUR INFORMATION**

- 8.1.** The Information that we collect from you is stored in the United States and if you are outside of the United States, such Information will be transferred from your location to our servers in the United States. You hereby expressly consent to such transfer of your Information to our servers in the United States.
- 8.2.** The Information that we may collect from you may also be processed by staff operating outside of the United States who work for us or for one of our affiliates. Such staff may be engaged in, among other things, the management of the Mobile Application and the provision of support services. Such staff will process Information in accordance with this Privacy Policy.

## **9. SECURITY**

- 9.1.** We take reasonable steps to ensure that your Information is treated securely and in accordance with this Privacy Policy. We may, for example, use encryption technology to secure your Information during transmission to our Mobile Application as well as external firewall and on-host firewall technology to prevent network level attacks.
- 9.2.** It is important for you to protect against unauthorized access to your password and to your devices used to access our Mobile Application. You are responsible for keeping your password confidential. For example, ensure that you sign off when you have finished using a shared device.
- 9.3.** If you are reporting anonymously, it is important for you to not to provide overly detailed descriptions of the incident. Very detailed reports may increase the likelihood of you being identified despite our efforts to keep your Information confidential.
- 9.4.** Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your Information, we cannot guarantee the security of your Information transmitted to our Mobile Application; any transmission is at your own risk.

## **10. ACCESSING AND AMENDING YOUR INFORMATION**

- 10.1.** We aim to provide you with access to your Information when you use our Mobile Application. If the Information you provide us is wrong, we strive to give you ways to update it quickly or to delete it – unless we have to keep that information for legitimate business or legal purposes. When updating your Information, we may ask you to verify your identity before we can act on your request.

- 10.2. We may reject requests that are unreasonably repetitive, require disproportionate technical effort (for example, developing a new system or fundamentally changing an existing practice), risk the privacy of others or would be extremely impractical (for instance, requests concerning information residing on backup systems).
- 10.3. If your Information has been aggregated and/or deidentified, it may be next to impossible to remove your data from the whole. If you have decided to have your information removed, you must contact us.
- 10.4. Where we can provide Information access and correction, we will charge you a fee of £10 to meet our costs in providing you with details of the information we hold about you.
- 10.5. We aim to maintain our Mobile Application in a manner that protects Information from accidental or malicious destruction. Because of this, after you delete Information, we may not immediately delete residual copies from our active servers and may not remove Information from our backup systems.
- 10.6. You can opt-out of receiving future marketing communications by adjusting your notifications settings in the general section of your mobile or by contacting us on the details below or by clicking the “unsubscribe” link in an email message.
- 10.7. If your account is deactivated for any reason whatsoever, you understand that any Information provided to us will remain stored on our servers. We may retain a copy of your Information for compliance or legitimate business reasons. When you update Information, we may retain a copy of the prior version for our records.

## 11. CHANGES TO OUR PRIVACY POLICY

- 11.1. Our business changes constantly, and our Privacy Policy may therefore also need to change. We will post the current version of this Privacy Policy on the Mobile Application and each such change will be effective upon posting on the Mobile Application or upon the date designated by us as the “effective date”.
- 11.2. We will notify you by e-mail of any material changes to our Privacy Policy as required by law.
- 11.3. It is your obligation to regularly check the Privacy Policy. Your continued use of the Mobile Application following any such change constitutes your agreement to this Privacy Policy as so modified.
- 11.4. If you have reported anonymously, you will not receive any notices of changes to our policies. However, you can monitor such changes on your own by checking our Privacy Policies on our website.

## 12. CONTACT

- 12.1. If you have any concerns about your Information on the Mobile Application, please contact us with a thorough description, and we will try to resolve it. Our customer service contact details are:
  - (a) Email: [info@reddotfoundation.org](mailto:info@reddotfoundation.org)
  - (b) Address: 5217 Lightning View Road, Columbia, Maryland, 21045, USA
  - (c) Website: [www.safecity.in](http://www.safecity.in)