

PRIVACY POLICY

HomeStretch AG, a part of HomeStretch Group (“**HomeStretch**”), is the creator of navigation application **HomeStretch** (the “**Application**”), intended for either personal or business use. All legal rights with regard to the Application are reserved by Homestretch.

HomeStretch, a mobile application, which functions as a route optimization suite for businesses and individuals, is an integrated software package (program code, databases, digital map solution and a number of tools for route management, interface and all future updates) that is provided either on a fee payment basis (business version) or free of charge (personal use version).

The privacy of our users (everyone who has an authorized access to the Application) and any other third parties the users interact with in the Application, as well as the security of their personal data is of vital importance for us at HomeStretch.

1. SCOPE

This Privacy Policy (the “**Policy**”) explains how we at HomeStretch collect and process data related to the users of our Application and to all other third parties they are in touch with through our Application.

This Policy governs the use of the Application and shall be applied to any future versions of the Application or web-sites which we may develop.

This Policy falls under requirements of the EU General Data Protection Regulation (“**GDPR**”). The Application has users from all over the world, therefore this Policy applies in each of the jurisdictions outside of the European Union to the extent that it does not conflict with national laws of these jurisdictions.

This Policy does not cover personal data processing by third parties, including those that may disclose personal data to us. HomeStretch is not liable for the third parties’ methods or purposes of data processing.

HomeStretch shall be the “**Data Controller**” in the meaning of GDPR with regard to personal data of users of the Application and of any other third parties, and has respective responsibilities.

Individual whose personal data is being processed shall be the “**Personal Data Subject**” in the meaning of GDPR and has respective rights.

2. PERSONAL DATA THAT WE PROCESS AND MEANS OF PROCESSING

2.1. Personal data of the User

We collect information from business entities about their employees, who use HomeStretch application (users), these employees also provide this information to us directly. Business entities are fully responsible for obtaining consents to data disclosure from all employees whose personal data they transfer to HomeStretch.

We collect the following data about the user:

- username;
- mobile number;

- e-mail address
- location information, including but not limited user's mapping, route information, user's point of origin, the address of user's destination, the starting time of trip, the route the user is aimed to follow;
- personal preferences;
- account picture, which may be user's photo (provided at by the user willfully).

As our Terms of Use https://homestretch.ch/terms_of_use_biz require, username must be the real name of the user and mobile number must be valid. The user provides this information to us directly through the Application and is fully responsible for provision of true, accurate, up-to-date and complete information.

Location information is collected automatically by the Application if the Internet connection and proper GPS signal exist.

2.2. Personal data of third-parties

We collect personal data of third parties via the Application – these individuals are the contacts of users, whose data is stored on users' electronic devices with which they get access to the Application.

With regard to these individuals HomeStretch automatically collects via the Application the following data from the contact data bases on users' devices:

- contact name;
- mobile number(s);
- database userpic, which may be third party's photo.

This information is regarded as provided by the user and the user is fully liable for obtaining all consents, mandatory for transfer of third parties' personal data or warrants that such consents are not required by the applicable laws.

3. PURPOSES OF PERSONAL DATA COLLECTION

The purposes of collecting and processing Users' and third-parties' personal data are as follows:

Nature of personal data	Purpose of collection	Lawful basis of processing
<ul style="list-style-type: none"> • Username • User's mobile number, position in the company, account picture. 	<ul style="list-style-type: none"> • Registration of user's account. • Identification of the user. 	<p>It is necessary:</p> <ul style="list-style-type: none"> • in order to protect the vital interests of the User (to secure its account). • for the performance of our obligations under the End User License Agreement between Homestretch and the User.

Location information	<ul style="list-style-type: none"> • Customization of navigation functions — creation of trips, destinations, routes, calculation of their duration. 	It is necessary for the performance of our obligations under the End User License Agreement between Homestretch and the User.
Personal preferences	<ul style="list-style-type: none"> • Personalization of the content provided to the User in the Applications (creation of cookies). 	It is necessary for the purposes of the legitimate interest (to improve our marketing strategy).
Contact name, mobile number of a third party	<ul style="list-style-type: none"> • Identification of a third-party when User invites him/her to use the Application using the option Invite to “Homestretch”. 	It is necessary for the purposes of the legitimate interest (to raise the effectiveness of our services and attract new users).

HomeStretch shall not process the following personal data in the ordinary course of our business: race or ethnicity, political views, religious or philosophical beliefs, physical or mental health, sexual life, any actual or alleged criminal offences or penalties, trade union membership or any other information that may be deemed sensitive under the GDPR.

HomeStretch shall not process personal data of minors. Our Application is not meant to be used by children below the age of 16.

If we decide to process personal data of individuals for any other purposes, we shall ask for their explicit consent for such actions and amend this Policy in regard to the purposes of processing.

4. LAWFUL BASIS FOR PERSONAL DATA PROCESSING

HomeStretch strictly follows the legal requirements in regard to the information allowed to be collected and processed.

The most common reasons for HomeStretch to process personal data of individuals are:

- to ensure that we are able to perform our obligations under the License Agreements, Terms of Use or any other agreements that we entered or are about to enter with users;
- to ensure that we are able to fulfill our legitimate interests (e.g. business and commercial interests), not overriding fundamental rights and interests of personal data subjects at the same time.
- to ensure that we are compliant with applicable legal requirements.
- to protect the vital interests of the data subject or of another individual.

We always consider whether the volume of personal data we process for these reasons is not excessive.

We protect individuals’ rights by provision of security control in regard to personal data.

As a lawful basis of processing we use explicit and unambiguous consent of the User. Such consent contains in the Terms of Use applied to the Application. Such consent may be withdrawn at any time by contacting us (see contact details in Paragraph 12 of this Policy).

In other cases, when personal data is transferred to us by third parties we may use applicable lawful basis for processing data without obtaining consents.

5. DISCLOSURE OF PERSONAL DATA

We disclose personal data to a third party if it is required by the applicable laws in order to protect our rights, property and/or safety of our employees or Users of our Application, and/ or if it is required by the court or government authority.

We may also share personal data with other companies of HomeStretch Group under the specific legitimate agreements for the purpose of hosting such personal data and keeping it safe.

6. INTERNATIONAL TRANSFER OF PERSONAL DATA

The Application is accessible in different jurisdictions and attracts Users from all over the world. We mainly keep the personal data of Users from various countries within the EU. However, sometimes we shall transfer personal data that we collect to third parties outside of the EU.

If such third parties belong to HomeStretch Group, their activities in regard to personal data collection and processing are covered by this Policy to the extent allowed by local laws.

As to the other third parties, we shall transfer personal data to them only if we contractually obliged them to provide comparable level of protection to individuals after transfer of their personal data outside of the EU.

To ensure the protection of individuals' personal data we shall:

- transfer personal data only to countries that have been deemed to provide an adequate level of protection of personal data by the European Commission;
- use specific contractual provisions approved and recommended by the European Commission which provide the same level of protection of personal data that it has within the EU.

We transfer personal data related to the Application in case we need assistance with hosting it, managing databases, and any other assistance related to processing.

7. SECURITY MEASURES

We at HomeStretch apply certain security measures to prevent personal data of individuals from unauthorized access and use, theft, accidental deletion or public disclosure.

We introduced limitations of access to personal data in regard to our employees and third parties. We only provide access for them if it is of vital necessity and has a lawful basis. We enter into confidentiality agreements with all third parties we disclose, share or transfer personal data both physically and electronically.

Our employees are guided by strict instructions of how to process personal data of individuals.

As to the technical measures for personal data protection, they are as follows:

- authorization when accessing our personal data bases, management systems;
- means of physical protection and limited access where our data is stored physically;
- preventive measures against data breaches.

Despite undertaking all such measures, we do not guarantee the total security of user's account, related personal data and personal data of any other third parties. In case of a data breach, we shall notify relevant government authority and personal data subject about the breach if we are legally obliged to do so.

We shall ensure that personal data which we process is true, accurate and up-to-date in case it is required by law.

If we have reasonable grounds to suspect that the personal data in our possession is untrue, inaccurate or outdated, it shall be either deleted or rectified. However, we do not guarantee that personal data in our possession is absolutely correct, accurate and up-to-date when we didn't know and couldn't have known about the opposite.

8. THE RIGHTS OF PERSONAL DATA SUBJECTS

Personal data subjects have the following rights:

- **the right of access by the personal data subject** (individuals are allowed freely access their personal data which we process);
- **the right to be informed** (individuals shall explicitly be informed about the collection and processing of their personal data as well as the purposes of processing);
- **the right to rectification** (individuals are allowed to request rectification of their personal data verbally or in writing);
- **the right to erasure 'right to be forgotten'** (individuals are allowed to request erasure of their personal data verbally or in writing);
- **the right to restriction of processing** (individuals are allowed to request the restriction or suppression of their personal data);
- **the right to data portability** (individuals have the right to receive personal data from us and transmit it to another data controller);
- **the right to object** (in certain cases individuals have the right to object the processing of their personal data).

All of these rights are not granted as an absolute and are subject to certain restrictions and/or exceptions.

9. PERSONAL DATA RETENTION

We ensure that processing of personal data takes a minimum period of time necessary for the purposes stated in this Policy.

While personal data is in our possession we consider the following:

- the nature and sensitivity of this personal data;
- the volume of this personal data and whether it is not excessive;
- the potential risk of unlawful breach, disclosure or leak of this personal data.

Once we fulfill the purposes of personal data processing stated in this Policy, or personal data is no longer deemed necessary to fulfill these purposes, we immediately and irrevocably delete it.

10. AMENDMENTS OF THE POLICY

This Policy is available on https://homestretch.ch/privacy_policy . HomeStretch reserves the right to amend this Policy from time to time without notifying personal data subjects, thus we advise to regularly review it in order to stay informed about recent changes.

11. COUNTRY-SPECIFIC DETAILS

Russia

There is a separate Privacy Policy for this jurisdiction in regard to personal data of Russian residents. This International Privacy Policy of HomeStretch applies in Russia only to the extent not covered by Russian Privacy Policy and Russian laws.

12. CONTACT DETAILS

Feel free to contact us in regard to this Policy, data subject rights, and/or any inquires:

Business entity	HomeStretch AG
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