

PRIVACY POLICY

Clurb UG respects your privacy. Clurb UG and its affiliates ("ACCTION" or the "Company") offers maps, GPS navigation, and community-based services to users of www.clurb.net (The "Website") or users of the ACCTION mobile applications (the "Application"), both collectively, the "Services". By using our services, you trust us your data. We know it is a big responsibility and we do our best to protect your information and let you control it.

The purpose of this Privacy Policy (the "Policy") is to inform you about what data we collect, why we collect it and how you can update, manage and delete it.

This Privacy Policy is part of the terms of use of ACCTION (the "Terms of Use" or "Terms"). Your use of the Services is subject to the Terms of Use and this Privacy Policy, and involves your unequivocal acceptance of all of them.

I. Preliminary points. Relevant information

The following key points are summarized here only for your convenience. They do not replace the full Privacy Policy and its presence in this section does not mean they are intended to replace or override any other term provided by ACCTION in the not abridged version.

Minimum age

To use our Services you must be at least 16 years of age or the lower age that your country or jurisdiction has provided for you to consent to the processing of personal data. For more information, refer to the Terms of Use.

Personal Information

In this Privacy Policy, the term "personal information" refers to information that you provide to ACCTION and that personally identifies you (such as your name or email address) and, in some cases, information regarding your location or other data that can be reasonably be associated with ACCTION

Contact ACCTION for privacy issues

If you have any questions about this Privacy Policy or if you believe your privacy has been compromised while using the Services, you can contact ACCTION at: info@clurb.net. You can also send other requests, questions, and claims to ACCTION to the email address just indicated.

User accounts and access to services

When you download the application on your mobile device, you create a ACCTION account associated with the device (the "Account" or "ACCTION Account"). Once the application has been downloaded, ACCTION collects and uses your information, including metadata (as described below), in accordance with this Privacy Policy. This use may include linking your information with your account in the ACCTION application (as explained below).

If you set a username and password in the ACCTION Application

- ACCTION links all your information with your account and this username, including information received from all mobile devices running the application where you have logged in with your username and password;
- Notwithstanding the next point, and as explained below in the "Visibility" section, your account and associated information can be shown only to ACCTION; and
- When you use the application, your approximate location and any other information you choose to provide to other users will be displayed.
- ACCTION can establish and periodically request additional or different means of identification and authentication to log in and access the Services, or request them in order to use certain features or sections of the Services.
- You are fully responsible for your login details, and any use or misuse that is made from your account and your personal information for providing your logon details to a third party. You must maintain the confidentiality of your login data and not provide them to third parties. Change your password often or at least every six months.

II. Information that ACCTION collects

Data we collect when you use our Services

ACCTION collects data to provide the best services to all users. Here we explain what information is collected.

Information you create or provide to us

- **Account information.** Information that ACCTION requests when you set your user name, such as your name and phone number. Note that if you provide false, incorrect or outdated information, the ability to provide the Services and contact you, if necessary, may be affected. ACCTION explicitly indicates the compulsorily fields to be filled. If you do not enter the data requested in these fields, it is possible that you cannot configure a username (although you can continue using the Services, as explained in the previous section).
- **Information you share with ACCTION** Data you want to share with ACCTION as, for example, your username; alerts associated with this username; phone numbers; home, work or other locations; destinations you can go; infrastructure information; search queries and files that you have uploaded to the service, including voice and audio, if applicable. Even if you have not logged into an account of ACCTION, you can provide information such as an email address to receive updates about our services.
- **Your communications through ACCTION Services.** If you use ACCTION to communicate with other users or third parties such as sending messages or chat on the **ACCTION** secured platform. We may also collect information about your communications with **ACCTION**, for example, if you send a request, contact our support team or contact the team of infringements.
- **Social network information that you use and you have linked to your ACCTION account.** You can link your ACCTION account with your social network accounts. In that case, you have the option to share information with other ACCTION users or from these social media accounts such as a Facebook profile picture or other personal information. For more information, see the section on social networks integration included below.
- **You can also provide additional information so that we can customize and improve your Services experience.** For example, if you provide us with information about your home and work, maybe we can tell you with special emphasis if a disaster or emergency has occurred nearby.

Information we collect when you use our services

We collect information about your activity in the ACCTION services, we use it to provide these services and provide functions that allow us to customize your experience. Here is the information we can gather about your activity:

- Detailed location information. The location information is collected, such as GPS signals (combined with a timestamp) and other data sent from the mobile device where you downloaded and activated the application.
- Communications or other content that you share with third parties, including users, through ACCTION Services;
- Your activity on websites and third-party applications that you have linked to your ACCTION account or with whom you have interacted through the Services.

Personal information we collect through our partners

ACCTION uses various technologies to collect and store information, such as cookies, local storage, web browsers storage, application data caches, databases and server logs.

III. What does ACCTION collect this data for

We may use the personal information we collect or you provide us with the following purposes:

Provide our services

We use your information to deliver our services. For example:

- We use your location data to offer alerts of disasters and emergencies occurring in the city or town where you live, and to allow you to provide such warnings through our services. In addition, location data is used to trigger emergency services corresponding to the warnings sent.
- We use your warnings information, such as type of disaster event and location, to offer specific procedures you can follow to minimize the impact of this event in your life and your family, friends and neighbors, and your property.
- We use the data you send in relation to the location of infrastructure and services, and the occurrence of past disasters, to assist in the preparation of plans for risk

management by the municipality and other institutions, so they can give better and more specific answers to problems your community and city faces.

- We share the information you send us to other users of the Services and we help you communicate with ACCTION and other users.
- We also help you receive messages and information provided by the local authorities in relation to the occurrence of disasters and / or emergencies.

Maintain and improve our Services

- We also use your information to ensure that our services work correctly as, for example, to keep track of network outages or solve problems that you inform us. We also use your information to improve our services, or to develop new features for them.
- We may also use the information to provide assistance, and manage requests and claims.

Measure performance

- We use data analysis and measurement tools to understand how our services are used. For example, we analyze your usage data of the Services to optimize the product design.

Contact you

- We also use your information to send news, announcements, notices and additional information related to the Services.
- We may also use your information to conduct surveys and questionnaires; and if you get in touch with us, we will keep a record of your request to solve problems you may have.
- We can also use the email address you provided us (with your prior consent and within the provisions of applicable law) to send promotional or marketing material. If you prefer not to receive such material, you can unsubscribe at any time by clicking on the appropriate link in the emails we send you. In any case, we will not share your contact information with any advertiser, unless required by law or as expressly permitted.

Other purposes of data collection

For legal reasons and to protect ACCTION, our users and the general public, we may also use and process your information and your content using different technologies for the following purposes:

- Ensure compliance with the Terms of Use and Privacy Policy.
- Contact you when we deem necessary.
- Comply with applicable laws and help public authorities that are responsible for ensuring compliance with the laws, when we believe in good faith that the cooperation with these is our mission or it is necessary under the legal standards and procedures applicable.
- Detect abuses and illegal activities; detect and prevent fraud, misappropriation, identity theft and other illegal activities and inappropriate uses of the Services.
- Manage breakdowns and malfunctions.
- In case of dispute or legal proceeding of any kind between the user and the Services, or between you and other users or third parties in connection with the Services.
- Comply with the purposes stated in this Privacy Policy and Terms of Use.
- Help improve the safety and reliability of our services. This includes to detect, prevent and respond to security risks and technical problems that could harm ACCTION, our users or the general public.
- Create aggregated or anonymous data provided that such data do not identify a specific user. See section below "How ACCTION uses aggregate information."

We will ask for your consent before using your information for a purpose that is not included in this Privacy Policy.

IV. **When your information is shared**

When you share your personal information

Our Services are based on a community of users and governmental institutions sharing information with ACCTION and other members of the community.

You can share personal information such as your name, age, sex, photos, location data, reports and other files. This information can be shared directly with the Services and all

users. It can also be shared through third-party services (like social networks) that interact with the Services if you authorize it in the configuration of the Services.

You can decide whether you want to upload Content to the Services

However, the content you share and send will not be private or confidential, and may be published and disseminated. The information you upload will be published with your username and other data such as personal information you have added to your public profile. Note that some of the disasters, emergencies, or accidents may include the journey that you made in the area where they have occurred. Therefore, you should exercise caution and common sense when submitting information. You must take at least the same precautions when posting personal information that you use through other Internet or mobile services.

In any case (except as noted below in connection with the information shared from your social network accounts according to the privacy settings you have defined in such accounts), your email address will not be displayed to other users in any kind of report or any user publication that you share or upload.

We take effective measures to bring the best possible experience with the Services. However, we cannot control the behavior of users and disclaims any responsibility in this regard. We encourage users to think carefully about whether they want their information published or disseminated and that before taking a decision, they should examine in depth all the necessary details related to communications with other users.

The user is solely and ultimately responsible for complying with all laws, regulations and other obligations. ACCTION disclaims all liability for any loss, damage, cost or expense you may suffer or that may incur as a result of, or in connection with, your participation in any activity or event initiated, organized or held by a user or third party or in connection with any contract between those users or third parties, including activities or events that are related, directly or indirectly, with the Services or their use.

When ACCTION shares your personal information

ACCTION does not sell, rent, or lease your personal information to third parties.

ACCTION does not share your personal information with third parties without your permission, unless it considers in good faith that is necessary for the purposes listed below:

- When it is necessary for the provision and operation of the Services, for example, to publicly address emergencies or natural disasters or similar situations that you notify and that are associated with your username and location.
- In case that ACCTION reasonably believes that you have breached the Terms of Use (or is investigating a possible breach of these), or you have abused your rights to use the Services or have acted or omitted any law, rule or regulation. In such cases, ACCTION may share your information with a public agency responsible for ensuring compliance with the laws and other relevant authorities as well as with any third party if case is it necessary to repair any damage resulting from your infringement.
- If the law requires ACCTION to share or disclose your information, or if ACCTION reasonably believes that it is a legal requirement.
- In case of a dispute or legal proceedings of any kind between the user and ACCTION, or between you and other users regarding the services rendered.
- Whenever ACCTION deems it reasonably necessary to share your information to protect ACCTION, its users and the general public, of damages to their rights or property, or safety, as required or permitted by law. This includes the prevention of imminent harm, whether physical or material.
- To detect, prevent or otherwise address fraud and technical or safety problems.
- In case that ACCTION organizes the operation of its services in a different legal framework, or through another legal structure or entity; or in case of acquisition, absorption or fusion of ACCTION by another entity; or if ACCTION declares it bankruptcy, insolvency or starts, or it is applied against ACCTION, any insolvency proceeding (provided that these entities agree to comply with the provisions of this Privacy Policy, taking into account the changes that may apply).
- To collect, store, retain and manage your personal information using cloud services or hosting, or through a third party or an affiliate or related part to ACCTION (as reasonable for business purposes), whether it is in the European Union, in the United States or in countries outside your jurisdiction.
- ACCTION can also share your personal information with companies or related organizations to or affiliated with ACCTION as, for example, subsidiaries, affiliates and parent companies (i.e. entities belonging to the group of companies CLURB).

- ACCTION can also share your personal information with service providers and trusted partners to treat it on your behalf in accordance with the instructions provided to them, and in accordance with this policy and other security measures and confidentiality applicable. For example, ACCTION could use service providers to offer customer service.

Visibility

Please note that your username and other information may be displayed publicly. Information you publish in ACCTION include your username.

Integration into social networks

You can share information between your ACCTION account and your social network accounts such as Facebook. In that case, you have the option to transmit and share your personal information and other content you have on social networks through the Services.

When setting up your ACCTION account to integrate it into social networks, and when you log in ACCTION with a social network account (such as your Facebook account and your Google account), you agree to share information (including personal information) between ACCTION and these social networks with the purposes described in this Privacy Policy.

The use that social networks make of the information provided by ACCTION is governed by the privacy policy of each network and is controlled by this. This Privacy Policy and ACCTION have no control over this use.

The first time you connect to the account of a social network through the Services, or the Services interact with your social network account otherwise, the social network will ask permission to share with ACCTION the personal information you have stored in it. ACCTION collects information from your social network account (such as your name, email address, profile picture and other data available through the social network in question) based on the permissions you have granted.

You understand and agree that the Services may access this information, disseminate and store it so that it is available in your ACCTION account and through it, until that account is deleted.

You must be aware that certain information that has private accounts in social networks can be made public for other users ACCTION through the Services when you allow social networks to share it with ACCTION

Integration into other third-party services

ACCTION may offer you the possibility to link the application with third-party services that may be useful. When ACCTION detects that integration can occur (because a third-party service tries to connect with ACCTION, or because ACCTION detects that the device has installed a service with an integration option or the user requests a specific integration), it asks for information to link the accounts. If you decide to link them, ACCTION will ask permission to share data with third-party services. You only have to accept linking your accounts if you do not mind that the service receives the configured data. ACCTION it is not responsible for the use of the data made by this third-party service. You can unlink your ACCTION accounts in any time, in which case ACCTION will stop sharing your data to the third-party service.

V. Information Control

Controlling your personal information

In your Account, you can view and modify certain data (such as your email address or other you want to share).

If you believe that the information associated with your account is incorrect, it is incomplete or outdated, you can perform any necessary corrections or updates. If the information is false, inaccurate or outdated, you may not be able to configure a username and therefore ACCTION will not be available to grant its Services.

Privacy controls

You can control the information that ACCTION collects through the device settings. This may have controls that determine the type of information that ACCTION collects; for example, you can change the location settings on your device.

Delete your information

If you want ACCTION to delete your information that has been collected, you must send an email to the ACCTION contact box. Upon receiving this request, ACCTION will take the measures it deems reasonable to remove such information. However, it may not be removed immediately from their security systems. The aim of ACCTION is to start the process of elimination as soon as he receives your request. From that moment, your data may no longer be used to customize your experience. Then, a process designed to safely remove and complete data storage systems will start. This process usually last approximately one week from the time the information is deleted. As in all processes of suppression, aspects such as routine maintenance, unexpected power failure cuts, errors or failures protocols can cause processing delays and periods, as defined in this Privacy Policy. ACCTION systems are designed to detect and solve these problems.

How to delete your account in the app (Step by Step)

1. Open the Action app on your device and log in with the account you want to delete.
2. Tap hamburger menu (Three horizontal lines) located in the top left.
3. Tap > Profile.
4. Under "Emergency Contact Information", tap > Delete Account.
5. To confirm, tap > Yes, Delete my account.

How ACCTION retains the data it collects

Some data can be removed at any time, while other is automatically deleted or retained for longer periods of time, if necessary. This section describes why ACCTION retains different data types for different lengths of time.

- **Data that ACCTION retains until you delete it.** This data can be your home or work bookmarks, your email address and other account-related data. These data are stored in your account until you delete or modify it from ACCTION.
- **Data that expires after a period of time has elapsed.** In some cases, you do not need to remove your information, because ACCTION sets a maximum retention

period depending on the subject of data collection. ACCTION can also take steps to anonymize some data for specific periods of time.

- **Information kept until your account is removed from ACCTION.** ACCTION can keep some data during the time you use the Services, if that lets it know how users interact with their functions and how they can improve services. For example, if you created an alert or an event, ACCTION retains information on the number of reports / reports / notifications that you have sent, even after the event has been removed.
- **Information held for long periods of time for specific purposes.** Sometimes, legal and business requirements force ACCTION to preserve certain information for specific purposes for a period of time. These are some of the reasons why some data may be stored for extended periods of time:
 - Ensure security and prevent fraud and abuse.
 - Meet legal or regulatory requirements.
 - Ensure continuity of services.
 - Send communications with ACCTION.

VI. **How ACCTION uses aggregated data**

ACCTION can use anonymous, statistical or aggregate information (including anonymous location data), so that it is impossible to identify users, to provide the Services properly, improve quality, optimize your experience, create services and functions (including custom services) modify or cancel content or services, and other domestic, commercial and statistical purposes.

ACCTION can also use anonymous, statistical or aggregated information collected in the Services (and so that it is impossible to identify users) to publish, broadcast, transmit, or otherwise communicate this information or make it available to users of the services, suppliers and partners, and any other third party. It can facilitate the detection of events such as accidents, incidents, emergencies or natural disasters or similar cities.

Cookies

ACCTION may use cookies and similar technologies in the Services. Cookies are packs of information that Web servers send to your web site browser and the browser returns each time you access the Web site servers.

ACCTION may use cookies for various purposes such as, for example, prevent you from having to re-enter your username and password every time you log in, facilitate the use of the Website, collect statistical data, verify information, to customize the website according your personal preferences and protect your information.

Some cookies expire when the session ends and you leave the browser. Others are saved to the ACCTION drive of your computer or access device. If you want to block cookies from the Website, use the Help button on your browser and follow the instructions. However, if you disable cookies, you may find it difficult, or even impossible, to use the Website or some of its functions.

- Find out how Google uses information from websites and applications using their services and how you can control this use.
- When you visit a third party website from the application, this site may use cookies on your computer. This use of cookies is subject to the privacy policies of the third party and not this Privacy Policy. If you want to know the privacy policies of a third-party, make use of the consulting services or contact him directly.

Security of the information

Information security is a top priority of ACCTION ACCTION services include powerful security features that protect your information constantly. ACCTION implements systems, applications and procedures to protect your personal information and minimize the risk of theft, damage, loss of information and unauthorized access or use in connection with information. For example, ACCTION reviews its collection practices, storage and data processing (including physical security measures) to prevent unauthorized access to their systems. It also restricts access to personal information so that only it can be accessed by employees, contractors and agents of ACCTION who need such information to treat it.

ACCTION gets maintenance information that helps to automatically detect and block security threats so they never affect you.

However, these measures cannot guarantee absolute protection. Therefore, although ACCTION makes every effort to protect your personal information, it cannot guarantee (and it is unreasonable to expect) that their databases are free of violations, failures, access or illegal wiretapping, or other types of abuse and misuses.

Compliance and cooperation with regulatory authorities

ACCTION periodically review this Privacy Policy and ensures the treatment of the information in accordance with it.

Data transfers

ACCTION stores data in distributed servers worldwide. Therefore, your information may be on servers located outside your country of residence. The data protection laws vary by country, so some offer more protection than others. Regardless of where information is concerned, the same protective measures, as described in this policy, are implemented.

When ACCTION receives formal written complaints, it gets in contact with the person who made the complaint. It also works with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of data that has not been solved directly with users.

European requirements

If the law of data protection in the European Union, in particular the General Rules for Data Protection, or "GDPR" (General Data Protection Regulation) by its acronym, is applicable to the treatment of your information, ACCTION will provide the controls described in this policy so you can exercise your right to request access, update, remove, eliminate and restrict your data.

You can also export a copy of your ACCTION account data, if you want to back up or export your information to another service. You can apply by sending an email to info@clurb.net. To do this, you need to tell us a previously valid email address in which you will receive the data file.

Right to oppose the processing of your information

ACCTION treat your information with the purposes described in this Privacy Policy, according to the following legal bases:

Consent...

ACCTION request your authorization to treat your information with specific purposes and you have the right to revoke your consent at any time. You can manage these options and privacy settings in the application whenever you want.

... in the exercise of legitimate interests ...

ACCTION treats your information to fulfil their legitimate interests and those of third parties (such as partners) and at the same time, apply appropriate security measures to ensure your privacy. This means that your information comes with the following objectives:

- Provide, maintain and improve its services to meet the needs of users.
- Develop new features and services that are useful to users.
- Knowing how users use their services to ensure and improve performance.
- Customize their services to offer a better user experience.
- Promote their services among users.
- Detect, prevent or otherwise address fraud solving, abuse and technical or safety problems related to their services.
- Protect ACCTION, its users and the general public, of damage to their rights and property, as required or permitted by law.
- Conduct research to improve services for users and benefit the general public.
- Meet obligations to its partners, as developers and rightsholders.
- Respond to legal claims, including investigation of potential violations of applicable terms of service.

... to provide a service ...

ACCTION process your data to provide a service you requested under contract, including Terms of Use.

... and to meet legal obligations.

ACCTION process your data to fulfill all legal obligation if required, for example, to respond to legal process.

If you have any questions, you can contact ACCTION at: info@clurb.net. You can also contact the authority of local data protection if you have any questions about your rights under local law.

VII. **Changes to this Privacy Policy**

ACCTION may modify this Privacy Policy periodically. Major changes will apply 30 days after they have been published through:

- A system message to users to notify them of the changes made to the Privacy Policy; and
- A notice on the home page or other relevant page of the Web site explaining the changes made to the Privacy Policy, as well as a comparison of the new version and the old.

After they are posted on the Website, other changes will apply after 7 days of being posted. However, if ACCTION change this Privacy Policy to comply with legal requirements, addends or attachments, it will be applied immediately after they are published, or as needed.

Acceptance of the changes made under the terms of this Privacy Policy

If you keep using the Services, you accept the modified conditions. If you do not agree with any of the amended terms, you must stop using the Services.