# Privacy Policy of **Pocket Coach**

This Application collects some Personal Data from its Users.

# **Policy summary**

Personal Data collected for the following purposes and using the following services:

# **Advertising**

MoPub, AdMob, Chartboost, UnityAds, Fyber/Heyzap Personal Data: Cookies and various types of Data as specified in the privacy policy of the service

# **Analytics**

#### **Fabric Answers**

Personal Data: Cookies, unique device identifiers for advertising (Google Advertiser ID or IDFA, for example) and Usage Data

**Contacting the User Mailing list or newsletter** 

Personal Data: email address

**Device permissions for Personal Data access Device permissions for Personal Data access** 

Personal Data: Camera permission and Microphone permission

# **Full policy**

# Owner and Data Controller Types of Data collected

Among the types of Personal Data that this Application collects, by itself or through third parties, there are: Cookies, Usage Data, unique device identifiers for advertising (Google Advertiser ID or IDFA, for example), email address, Camera permission and Microphone permission.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

The Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using this Application.

All Data requested by this Application is mandatory and failure to provide this Data may make it impossible for this Application to provide its services. In cases where this Application specifically states that some Data is not mandatory, Users are free not to communicate this Data without any consequences on the availability or the functioning of the service.

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

Any use of Cookies – or of other tracking tools – by this Application or by the owners of third-party services used by this Application serves the purpose of providing the service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy, if available.

Users are responsible for any third-party Personal Data obtained, published or shared through this Application and confirm that they have the third party's consent to provide the Data to the Owner.

# Mode and place of processing the Data Methods of processing

The Data Controller processes the Data of Users in a proper manner and shall take appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Data Controller, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of the site (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Data Controller at any time.

#### **Place**

The Data is processed at the Data Controller's operating offices and in any other places where the parties involved with the processing are located. For further information, please contact the Data Controller.

#### **Retention time**

The Data is kept for the time necessary to provide the service requested by the User, or stated by the purposes outlined in this document, and the User can always request that the Data Controller suspend or remove the data.

## The use of the collected Data

The Data concerning the User is collected to allow the Owner to provide its services, as well as for the following purposes: Analytics, Advertising, Contacting the User and Device permissions for Personal Data access.

The Personal Data used for each purpose is outlined in the specific sections of this document.

# **Device permissions for Personal Data access**

Depending on the User's specific device, this Application may request certain permissions that allow it to access the User's device Data as described below. By default, these permissions must be granted by the User before the respective information can be accessed. Once the permission has been given, it can be revoked by the User at any time. In order to revoke these permissions, Users may refer to the device settings or contact the Owner for support at the contact details provided in the present document.

The exact procedure for controlling app permissions may be dependent on the User's device and software.

Please note that the revoking of such permissions might impact the proper functioning of this Application.

If User grants any of the permissions listed below, the respective Personal Data may be processed (i.e accessed to, modified or removed) by this Application.

### Camera permission

Used for accessing the camera or capturing images and video from the device.

## Microphone permission

Used for accessing and recording microphone audio from the User's device.

# Detailed information on the processing of Personal Data

Personal Data is collected for the following purposes and using the following services:

### **Advertising**

This type of service allows User Data to be utilized for advertising communication purposes displayed in the form of banners and other advertisements on this Application, possibly based on User interests.

This does not mean that all Personal Data are used for this purpose. Information and conditions of use are shown below.

Some of the services listed below may use Cookies to identify Users or they may use the behavioral retargeting technique, i.e. displaying ads tailored to the User's

interests and behavior, including those detected outside this Application. For more information, please check the privacy policies of the relevant services. In addition to any opt out offered by any of the services below, the User may opt out of a third-party service's use of cookies by visiting the Network Advertising Initiative opt-out page.

#### **MoPub**

MoPub, a division of Twitter, Inc. and Twitter International Company, provides advertising technology services that allow publishers of mobile applications ("apps") to show ads in their apps, and for advertisers to reach audiences that may be interested in their products or services. MoPub's suite of advertising technology includes the MoPub Software Development Kit (MoPub SDK) and Application Programming Interfaces, the MoPub advertising exchange, and the MoPub websites (collectively, the "MoPub Services").

https://www.mopub.com/legal/privacy/

#### AdMob

https://support.google.com/admob/answer/6128543?hl=en

#### Chartboost

This privacy statement ("Privacy Policy") explains how information (both customer and end user information) is collected and utilized by Chartboost, Inc. and its subsidiaries and affiliated companies ("Chartboost", "our", or "we"). This Privacy Policy applies to the websites provided by Chartboost, including without limitation, www.Chartboost.com (the "Sites") and Chartboost's online services ("Online Services"). "You", "your", or "customer" refers to our customers. If you do not agree to the terms and conditions of this Privacy Policy, please do not provide us with any information and do not use the Online Services. If you have any concerns about privacy, please send an email to privacy@chartboost.com. <a href="https://answers.chartboost.com/en-us/articles/200780269">https://answers.chartboost.com/en-us/articles/200780269</a>

## **UnityAds**

Unity Ads has probably collected device information, like IP address and device identifiers, and information regarding the delivery of ads and your interaction with them, all of which may be shared with ad publishers and attribution companies. Unity Ads may also incorporate data derived from the Unity Analytics service in user profiles and use that profile data in order to provide personalized advertising. When Unity provides personalized advertising, it will provide you notice and information about how to opt-out of such interest based advertising. Please review the information contained under the heading "What are my privacy choices for advertising?" below to learn more about how to exercise choice with regard to personalized ads.

https://unity3d.com/legal/privacy-policy? qa=2.24155961.2059843279.1525354675-461231398.1523876844

# Fyber/Heyzap

The Fyber Group (Fyber N.V., Fyber Monetization Ltd., Fyber GmbH, Fyber Media GmbH, Fyber RTB GmbH, Advertile Mobile GmbH, and Heyzap Ltd.), d/b/a "Fyber" and any future corporate affiliates (collectively, "**Fyber**") put great efforts in making sure that personal information is safe and used only in full compliance with applicable data protection laws and regulations.

This privacy policy ("**Policy**") explains Fyber's privacy practices for processing personal information on Fyber's website (the "**Site**") and via Fyber's Services. It applies whenever you access or use the Site or a mobile application or website that is connected and/or uses the Services (as applicable). Please take the time to read the full Policy. Capitalized terms used herein are defined in this Policy. <a href="https://www.fyber.com/legal/privacy-policy/">https://www.fyber.com/legal/privacy-policy/</a>

#### Analytics

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

### **Fabric Answers (Google Inc.)**

Fabric Answers is an analytics service provided by Crashlytics, a business division of Google Inc.

#### In order to understand Google's use of Data, consult

Google's partner policy. This service is designed for mobile apps analytics and can collect various information about your phone, highlighted in the Fabric Answers privacy policy.

In particular, this Application uses identifiers for mobile devices (including Android Advertising ID or Advertising Identifier for iOS, respectively) and technologies similar to cookies to run the Fabric Answers service. Fabric Answers may share Data with other tools provided by Fabric/Crashlytics, such as Crashlytics or Twitter. The User may check this privacy policy to find a detailed explanation about the other tools used by the Owner.

# Contacting the User

#### Mailing list or newsletter (this Application)

By registering on the mailing list or for the newsletter, the User's email address will be added to the contact list of those who may receive email messages containing information of commercial or promotional nature concerning this Application. Your email address might also be added to this list as a result of signing up to this Application or after making a purchase.

Personal Data collected: email address.

Users may opt-out of certain Fabric Answers features through applicable device settings, such as the device advertising settings for mobile phones or by following the instructions in other Fabric related sections of this privacy policy, if available. Personal Data collected: Cookies, unique device identifiers for advertising (Google Advertiser ID or IDFA, for example) and Usage Data.

Place of processing: United States – Privacy Policy.

#### **Device permissions for Personal Data access**

This Application requests certain permissions from Users that allow it to access the User's device Data as described below.

#### **Device permissions for Personal Data access (this Application)**

This Application requests certain permissions from Users that allow it to access the User's device Data as summarized here and described within this document. Personal Data collected: Camera permission and Microphone permission.

# Additional information about Data collection and processing

#### Legal action

The User's Personal Data may be used for legal purposes by the Data Controller, in Court or in the stages leading to possible legal action arising from improper use of this Application or the related services.

The User declares to be aware that the Data Controller may be required to reveal personal data upon request of public authorities.

#### Additional information about User's Personal Data

In addition to the information contained in this privacy policy, this Application may provide the User with additional and contextual information concerning particular services or the collection and processing of Personal Data upon request.

#### System logs and maintenance

For operation and maintenance purposes, this Application and any third-party services may collect files that record interaction with this Application (System logs) use other Personal Data (such as the IP Address) for this purpose.

#### Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Data Controller at any time. Please see the contact information at the beginning of this document.

#### The rights of Users

Users have the right, at any time, to know whether their Personal Data has been stored and can consult the Data Controller to learn about their contents and origin, to verify their accuracy or to ask for them to be supplemented, cancelled, updated or corrected, or for their transformation into anonymous format or to block any data held in violation of the law, as well as to oppose their treatment for any and all legitimate reasons. Requests should be sent to the Data Controller at the contact information set out above.

This Application does not support "Do Not Track" requests.

To determine whether any of the third-party services it uses honor the "Do Not Track" requests, please read their privacy policies.

#### Changes to this privacy policy

The Data Controller reserves the right to make changes to this privacy policy at any time by giving notice to its Users on this page. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom. If a User objects to any of the changes to the Policy, the User must cease using this Application and can request that the Data Controller remove the Personal Data. Unless stated otherwise, the then-current privacy policy applies to all Personal Data the Data Controller has about Users.

#### Information about this privacy policy

The Data Controller is responsible for this privacy policy, prepared starting from the modules provided by iubenda and hosted on iubenda's servers.

#### **Definitions and legal references**

#### Personal Data (or Data)

Any information regarding a natural person, a legal person, an institution or an association, which is, or can be, identified, even indirectly, by reference to any other information, including a personal identification number.

#### **Usage Data**

Information collected automatically through this Application (or third-party services employed in this Application), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Application, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

#### User

The individual using this Application, which must coincide with or be authorized by the Data Subject, to whom the Personal Data refers.

# **Data Subject**

The legal or natural person to whom the Personal Data refers.

#### **Data Processor (or Data Supervisor)**

The natural person, legal person, public administration or any other body, association or organization authorized by the Data Controller to process the Personal Data in compliance with this privacy policy.

#### **Data Controller (or Owner)**

The natural person, legal person, public administration or any other body, association or organization with the right, also jointly with another Data Controller, to make decisions regarding the purposes, and the methods of processing of Personal Data and the means used, including the security measures concerning the operation and use of this Application. The Data Controller, unless otherwise specified, is the Owner of this Application.

# **This Application**

The means by which the Personal Data of the User is collected and processed.

# **Cookies**

Small sets of data stored in the User's device.

# **Legal information**

Notice to European Users: this privacy statement has been prepared in fulfillment of the obligations under Art. 10 of EC Directive n. 95/46/EC, and under the provisions of Directive 2002/58/EC, as revised by Directive 2009/136/EC, on the subject of Cookies.

This privacy policy relates solely to this Application.