

## **PADDLE LOGGER PRIVACY POLICY**

Paddle Logger Limited is committed to protecting and respecting your personal data and privacy. Whenever you provide us with Personal Data (as defined below) we are legally obliged to use your information in line with all applicable laws concerning the protection of Personal Data; including the Data Protection Act 1998 and 2018 (DPA) and The General Data Protection Regulation 2016 (GDPR) together, and with other subsequent laws (“**Data Protection Laws**”).

This policy (together with our terms of use as set out at [\(Terms of Use\)](#) applies to your use of:

- The Paddle Logger App mobile application software (App) available on the Apple App Store™, once you have downloaded the App onto your mobile telephone, smart watch or handheld device (**Device**).
- Any of the services accessible through the App (**Services**) that are available on the App Site or other sites of ours (**Services Sites**), unless the Terms of Use state that a separate privacy policy applies to a particular Service, in which case that privacy policy only applies. This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

This policy is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can download a pdf version of the policy [here](#).

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## **Important information and who we are**

Paddle Logger Limited is the controller and is responsible for your personal data (collectively referred to as "Company", "we", "us" or "our" in this policy).

We have appointed a data protection officer (DPO). If you have any questions about this privacy policy, please contact them using the details set out below.

## **Contact details**

Our full details are:

DPO: Lewis Smith

Full name of legal entity: Paddle Logger Limited

Email address: [dpo@paddlelogger.com](mailto:dpo@paddlelogger.com)

Postal address: Office 1, The Warehouse, Anchor Quay, Falmouth, Cornwall TR10 8GZ

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues or other competent supervisory authority of an EU member state if the App is downloaded outside the UK.

## **Children's privacy**

This App is not intended for children and we do not knowingly collect data relating to children. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

## **Changes to the privacy policy and your duty to inform us of changes**

We keep our privacy policy under regular review.

This version was last updated on 24/04/2020. It may change and if it does, these changes will be posted on this page and, where appropriate, notified to you when you next start the App or log onto one of the Services Sites. The new policy may be displayed on-screen and you may be required to read and accept the changes to continue your use of the App or the Services.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during our relationship with you. You can review and

change the Personal Data we hold for you at any time by contacting our Data Protection Officer.

### **Third party links**

Our Sites may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. Please note that these websites and any services that may be accessible through them have their own privacy policies and that we do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites or services, such as Contact and Location Data. Please check these policies before you submit any personal data to these websites or use these services.

### **The data we collect about you**

We may collect, use, store and transfer different kinds of personal data about you as follows:

- Identity Data
- Contact Data
- Financial Data
- Transaction Data
- Device Data
- Content Data
- Profile Data
- Usage Data (anonymous)
- Marketing and Communications Data; and
- Location Data

### **(“Personal Data”)**

We explain these categories of data [here](#).

The types of personal data we collect about you varies depending on the functionalities you use within the App and your interactions with us.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific App feature. However, if we combine or connect Aggregated Data with your personal data so

that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

### **Special Categories of Personal Data**

Except as set out in this privacy policy, we do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences. To the extent that these Special Categories of Personal Data are processed (for example a photo may reveal your race, ethnicity, religious beliefs or health information) such processing is incidental and this information is not actively collected by us. Your explicit consent to the taking of photos will also be obtained before these features of the App can be used. All photos will be stored on your Device unless you choose to share them on social media via the App at which point they will be processed by the social media provider in accordance with their own privacy policies which we would advise you to read before sharing photos. No photos taken using the App will be stored or shared by Paddler Logger.

Paddle Logger sends and receives the following data to the Apple Health App and the Apple Activity App:

- Gender
- Active Energy
- Heart Rate (for Apple Watch users)
- Route Data
- Workouts (session start and end time)

### **(“Apple Health and Activity App Data”)**

We will seek your explicit consent to this data being shared when you open the Paddle Logger App for the first time.

You can also opt in to read specific data from the Apple Health App for the sole purpose of creating graphs within the App.

This information is stored locally on your device and backed up on Apple’s cloud servers.. To find out how Apple may use and store this data please consult their privacy policy which can be found here: <https://www.apple.com/uk/legal/privacy/en-ww/>

The App anonymously collects the following data at the end of each trip for the purposes of improving our service:

- Battery level & trip distance (to see how little battery the app uses)
- Start location & end location (to anonymously map popular regions)

- Device model, craft type & system language (locale; to help us focus future development to improve the service)

## How is your personal data collected?

We will collect and process the following data about you:

**Information you give us.** This is information (including Identity, Contact and Marketing and Communications Data) you consent to giving us about you by filling in forms on the App Site and the Services Sites (together Our Sites), or by corresponding with us (for example, by email, via the website or through the App). It includes information you provide when you subscribe to any of our Services, share data via an App's social media functions, and when you report a problem with an App, our Services, or any of Our Sites. If you contact us, we will keep a record of that correspondence.

**Information we collect about you and your device.** Each time you visit one of Our Sites or use one of our Apps we will automatically collect personal data including Device, Content and Usage Data. We collect this data using cookies and other similar technologies. Please see our [cookie policy](#) for further details.

**Location Data.** We also use GNSS technology to determine your current location. Some of our location-enabled Services require your personal data for the feature to work. If you wish to use the particular feature, you will be asked to consent to your data being used for this purpose. You can withdraw your consent at any time by disabling Location Data in your settings but the App will not be able to function. GNSS data is stored on your device for the purpose of logging your journeys but is not shared with Paddle Logger unless you also use the optional [PaddleLIVE® functionality](#). Anonymised GNSS location data of start and end points of your journeys may be used to map popular regions.

**Information we receive from other sources including third parties and publicly available sources.** Third parties may provide us with Personal Data and they should only do so where the law allows them to. If you provide us with Personal Data about others, or if others give us your Personal Data, we may store that data and will only use that information for the specific reason it was provided. We will receive personal data about you from various third parties as set out below:

Device Data from the following parties:

- **Analytics providers.**
  - Amplitude -
  - [MixPanel](#) - We use Mixpanel's Data Residency Program, ensuring European Data resides in Europe. Please see the MixPanel privacy policy for further details: <https://mixpanel.com/legal/privacy-policy/>
- **Unique application numbers.** When you want to install or uninstall a Service containing a

unique application number or when such a Service searches for automatic updates, that number and information about your installation, for example, the type of operating system, may be sent to us.

### **Cookies**

Cookies are small data files that most website operators place on the browser or hard drive of a user's computer or other device. Cookies may gather information about the user's use of the App or any website linked to the App or enable the App or website to recognise the user as an existing customer when they return to the App or website at a later date. Cookies are also used to collect information about the user that allows the website operator or a third party to create a profile of the user, their preferences and their interests for the purpose of serving the user with targeted, interest-based advertising.

We use cookies and/or other tracking technologies to distinguish you from other users of the App, App Site, the distribution platform (Appstore) or Services Sites and to remember your preferences. This helps us to provide you with a good experience when you use the App or browse any of Our Sites and also allows us to improve the App and Our Sites. For detailed information on the cookies we use, the purposes for which we use them and how you can exercise your choices regarding our use of your cookies, see our cookie policy.

### **If you fail to provide Personal Data**

Where we need to collect Personal Data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time. Some Personal Data is needed for the functionality of the App.

### **How we use your personal data**

We will only use your personal data when the law allows us to do so. Most commonly we will use your personal data in the following circumstances:

- Where you have consented before the processing.
- Where we need to perform a contract we are about to enter or have entered with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Click [here](#) to find out more about the types of lawful basis that we will rely on to process your personal data.

Note that we may process your Personal Data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your Personal Data where more than one ground has been set out in the table below.

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your Personal Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

We will only send you direct marketing communications by email or text if we have your consent. You have the right to withdraw that consent at any time by contacting us.

We have set out below a description of all the ways we plan to use your Personal Data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate:

### **Users of Basic App Functionality**

This section covers the Personal Data Paddle Logger will collect if you download the App. When you install the Paddle Logger App, Apple will collect certain information from you including the following types of Personal Data: Identity Data, Contact Data, Financial Data, Transaction Data, Device Data, Content Data, Profile Data, Usage Data, Marketing and Communications Data and Location Data. For further information about how Apple uses your Personal Data when you download the App please see the Apple privacy policy:

<https://www.apple.com/uk/legal/privacy/en-ww/>

This data is not usually sent to, stored or processed by Paddle Logger when you download the App but some of this data may be processed by us when you use certain services or functionality (see tables below). Any details we receive from Apple when you download the App or make an in-App purchase are anonymous.

Anonymised data is also collected which includes analytics data for crash reporting, accounts and marketing purposes, some of which is collected via third party services:

- Amplitude and MixPanel are used for anonymised user data which informs us on sales, downloads, etc. and allow us to improve our service. We are also able to use Sentry for crash reporting. Further information can be found here:

<https://amplitude.com/privacy>

<https://mixpanel.com/legal/privacy-policy/>

<https://sentry.io/privacy/>

- RevenueCat and Superwall are used to help manage accounts and payments. Data is processed anonymously. Further information can be found here:

<https://superwall.com/privacy/dpa>

<https://www.revenuecat.com/dpa>

- Occasionally we may advertise our products to users of Facebook, we use anonymous data to track how well adverts are performing and this allows us grow the Paddle Logger community further. Further information can be found here:

<https://www.facebook.com/about/privacy/update>

## Data we process

| Purpose/activity  | Type of Data                       | Lawful basis for processing  |
|---|------------------------------------|--|
| To enable the App to function correctly and to track your routes  | Apple Health and Activity App Data | Your consent   |
| To ensure compliance with local laws and regulations  | Location                           | Legal obligation (to ensure we comply with the laws of a particular country or region)   |
| To manage our relationship with you including notifying you of changes to the App or any Services and to notify you of changes of terms of use or this privacy policy | Device<br>Profile                  | Your consent<br>Performance of a contract with you<br>Necessary for our legitimate interests (to keep records updated)<br>Necessary to comply with legal obligations (to inform you of any changes to our terms and conditions and privacy policy) |
| To administer and protect our business and this App including data analysis and system testing  | Device<br>Usage Data               | Necessary for our legitimate interests (to analyse how customers use our products / services)  |

| Purpose/activity  | Type of Data                               | Lawful basis for processing  |
|---|--|--|
| <p>To monitor trends so we can improve the App</p> <p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p> <p>To carry out statistical and other kinds of research and analysis based on anonymised data.</p> <p>To monitor conversion rates of advertising campaigns, to develop our user base and improve the App</p> | <p>Device</p> <p>Usage</p> <p>Location</p> | <p>Consent</p> <p>Necessary for our legitimate interests (to develop our products / Services and grow our business; to report statistics on paddle usage )</p> |

**When you contact us via our website, by email or submit a query through the App:**

| Purpose/activity   | Type of Data  | Lawful basis for processing   |
|--|---|---|
| <p>To provide customer service support to you and to administer and protect our business and this App including troubleshooting.</p> | <p>Identity</p> <p>Contact</p> <p>Device</p> <p>Version of the App in use</p> <p>Location (country and IP address only)</p> | <p>Necessary for our legitimate interests (for running our business, provision of administration and IT services)</p> |

**If you sign up to receive marketing communications from us:**

| Purpose/activity  | Type of Data                 | Lawful basis for processing |
|---|------------------------------|-----------------------------|
| To deliver content and advertisements to you                                  | Identity                     | Consent                     |
|   | Contact                      |                             |
| To make recommendations to you about goods or services which may interest you | Content                      |                             |
|   | Profile                      |                             |
| To measure and analyse the effectiveness of the advertising we serve you      | Marketing and Communications |                             |

**PaddleLIVE® Functionality**

The App incorporates the PaddleLIVE® service, formerly referred to as Paddler in Trouble (PiT). By using this service you can opt to provide contact information of a responsible nominated contact and agree that you have their consent to provide these details to Paddle Logger. In using this optional service you are consenting to Paddle Logger sending your nominated contact your GNSS location. You understand that once Paddle Logger sends your GNSS location to your nominated contact Paddle Logger is not responsible for what your nominated contact does with your location data. One element of the PaddleLIVE® service shares your live GNSS position to a webpage that is viewable by your nominated contact that will anonymously be sent the link to the webpage to ascertain your location. PaddleLIVE® also has a public sharing element which allows you to share a live track of your journey - this operates separately and does not share your personal details. Your track is visible to anyone with whom you share the link and privacy is your responsibility.

| Purpose/activity   | Type of Data  | Lawful basis for processing                         |
|--|---|---|
| To inform your nominated contact of your Location Data if you have enabled the service | Identity Data (Paddler Name)<br><br>Location Data<br><br>Device Data (limited to Paddler battery level)<br><br>Contact (emergency contact phone number provided by you by selecting it from the contact list on your device - their name will not be processed or stored) | Your consent<br><br>To fulfil our contract with you |

**Disclosures of your personal data**

We will keep your information within the organisation except where disclosure is required or permitted by law or when we use third party service providers (data processors) to supply and support our services to you. We have contracts in place with our data processors. This means that they cannot do anything with your Personal Data unless we have instructed them to do so. They will not share your Personal Data with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

When you consent to providing us with your personal data, we will also ask you for your consent to share your personal data with the third parties set out below for the purposes set out in the table [\[Purposes for which we will use your personal data\]](#):

- Internal Third Parties as set out in the [Glossary](#).
- External Third Parties as set out in the [Glossary](#).
- Responsible nominated contacts are shared your live GNSS position as part of the Paddler in Trouble service so that if necessary, they are able to facilitate a rescue and make contact with emergency services should they consider this a necessary and reasonable course of action.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a

change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

### **Use of Social Media**

We embrace the use of social media and may wish to process any comments made public by you. We suggest you review the privacy policies of any social media sites you use before using them.

### **International transfers**

Many of our external third parties are based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#).
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#).
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US. For further details, see [European Commission: EU- US Privacy Shield](#).

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

### **Data security**

All information you provide to us is stored on our secure servers hosted by Linode or on the Help Scout portal. Where we have given you (or where you have chosen) a password that enables you to access certain parts of Our Sites, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Once we have received your information, we will use strict procedures and security features to try to prevent your Personal Data from being accidentally lost, used or accessed in an unauthorised way.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator when we are legally required to do so.

## **Data retention**

We will only retain your Personal Data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your Personal Data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for Personal Data, we consider the amount, nature and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

As a general rule we will apply the following retention periods apply:

- Customer service data shall be kept for one year after your last contact with our customer service team;.
- Anonymous analytics and crash data shall be kept for 14 months;
- PaddleLIVE® Red Alert Trips (open trips) that are not ended shall be kept for 18 months after the trip started; and
- PaddleLIVE® successfully ended trips (including trips that are completed before any message is sent to your designated contact) shall be deleted after 7 days.

In some circumstances you can ask us to delete your data: see [\[Your legal rights\]](#) below for further information.

In some circumstances we will anonymise your Personal Data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## **Your legal rights**

Under certain circumstances you have the following rights under data protection laws in relation to your personal data.

Please click on the links below to find out more about these rights:

- [\[Request access to your personal data\]](#).
- [\[Request correction of your personal data\]](#).
- [\[Request erasure of your personal data\]](#).
- [\[Object to processing of your personal data\]](#).
- [\[Request restriction of processing your personal data\]](#).
- [\[Request transfer of your personal data\]](#).
- [\[Right to withdraw consent\]](#).

You also have the right to ask us not to continue to process your personal data for marketing purposes.

You can exercise any of these rights at any time by contacting us at:  
Email: [info@paddlelogger.com](mailto:info@paddlelogger.com)

You can also stop all collection of information by uninstalling the App.

## **Glossary**

### **1. Lawful basis**

**Consent** means processing your personal data where you have signified your agreement by a statement or clear opt-in to processing for a specific purpose. Consent will only be valid if it is a freely given, specific, informed and unambiguous indication of what you want. You can withdraw your consent at any time by contacting us.

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal obligation** means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

## 2. **Third parties**

### **External third parties**

- Service providers acting as processors based in the United States who provide customer support services (Help Scout), hosting (Linode) and marketing email platform services (Mail Chimp).
- Professional advisers acting as processors including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- Twilio our SMS service provider (only used if you are using the PaddleLIVE® functionality)
- You can share photos with Facebook and other social media providers via the App. Please see the privacy policy for the relevant provider before sharing your photos.

## 3. **Your legal rights**

You have the right to:

- **Request access to your personal data** (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you

want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
  - a) if you want us to establish the data's accuracy;
  - b) where our use of the data is unlawful but you do not want us to erase it;
  - c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
  - d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

### **Description of categories of personal data**

- **Identity Data:** first name, last name, maiden name, or similar identifier.
- **Contact Data:** email address and telephone numbers.
- **Financial Data:** bank account and payment card details.
- **Transaction Data:** includes details about payments to and from you and details of in- App purchases.
- **Device Data:** includes the type of mobile device you use, a unique device identifier (for example, your Device's IMEI number, the MAC address of the Device's wireless network interface, or the mobile phone number used by the Device), mobile network information, your mobile operating system, the type of mobile browser you use, time zone setting, internet

protocol (IP) address, browser plug-in types and versions.

- **Content Data:** includes information stored on your Device, including login information, photos, videos or other digital content, check-ins or other digital content.
- **Profile Data:** includes your username, in-App purchase history, your interests, preferences, feedback and survey responses.
- **Usage Data:** includes details of your use of any of our Apps or your visits to any of Our Sites including, but not limited to, traffic data and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access.
- **Marketing and Communications Data:** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Location Data:** includes your current location disclosed by GPS and GNSS technology. You can choose whether to allow this by changing your tracking settings but Location Data is a key element for the functionality of the App.