# Privacy at Buddy Talk

A short summary:

- We respect your privacy and don't read your personal chat messages without your consent.
- You can change your profile information by signing in to your account. If you ever want to remove your profile and chat messages please send a formal request to info@buddy-talk.nl.
- We keep your data on secured and restricted database servers. We do everything we can to keep your data secure and encrypted between your device and our servers.
- We reserve the right to restrict access to Buddy Talk in the event of misconduct. Buddy Talk wants to provide a safe community for language buddies. We therefore take reports of abuse very seriously. Reports of misconduct on Buddy Talk are reviewed by human moderators and can lead to a ban from our website.

### Contact

www.buddy-talk.nl info@buddy-talk.nl

### **Privacy policy**

This statement details how we handle personal data at Buddy Talk. We are respectful of the data that is shared with us by our members and take protecting it very seriously.

Buddy Talk is made in the Netherlands and we are firmly committed to meeting European data protection standards for all our members wherever possible.

Please take the time to read these details to fully understand how we handle your data and keep it safe.

### Personal data

Personal data refers to any information about personal or factual circumstances of an identified or identifiable person. This includes information and details such as your name, birth date, hometown and also your email address.

Unless otherwise specified, we obtain the data from you (including via devices used by you).

We only retain your data if you have consented to this as part of processing, until such time as you withdraw your consent (e.g. by deleting your account). If you have not logged into your account for more than one year, your account and personal details will be deleted.

#### Purposes of use

When handling your data, we pursue the following legitimate interests:

- Improving our service;
- Protecting against misuse;
- Statistics and service analytics.

Personal data will only be collected by us to the extent and for the purpose for which you provide the data to us, e.g. for registering an account at Buddy Talk.

We use and store your personal data as part of our services for the following purposes and only if you have provided us with your express consent:

- To create a public user profile for you on Buddy Talk;
- To provide a curated community just for language learners, where access is restricted to members only. We take best efforts to prevent abuse and ban offenders, as soon as we are made aware;
- To send information relevant to the service, e.g. via email (e.g. received messages, updates, etc.);

We use your personal information only within the company and forward it only to those companies that are involved in performing the contracts concluded with you or otherwise involved in providing the relevant service.

Otherwise, your personal information will not be forwarded to third parties unless you have given your express consent for this or unless we are obliged to disclose it – for example, at the direction of a court or administrative authority.

We forward the following customer data to third parties:

- Anonymous visitor information is collected through Google Analytics, for the purpose of analysing and improving our service.
- E-mail addresses are collected through Mailchimp, for the purpose of sending e-mail newsletters.
- Personal information (profiles, chat messages) are stored on a webserver hosted by Digital Ocean for the purpose of offering you a functional online experience.
- The webserver is provisioned by Laravel Forge, a service that has access to the webserver for the purpose of installing and updating necessary services.
- If you log in with your Facebook account, Facebook has access to your profile information.

We create Buddy Talk member profiles based on your login data and also use these profiles and the information they contain, provided by you, for the purpose of creating a public member profile for you on Buddy Talk. While some elements of your profile, including your first name, age, profile picture, language settings, profile description, and current city are public, only Buddy Talk members can contact you via the Buddy Talk website by sending you a message. We never show your email address, exact location, or last name in your profile settings to other members.

You can edit personal data within the Buddy Talk website. You can do so by clicking on your name when logged in and accessing the data. If you would like to completely delete your account and all personal data, you can send this request to info@buddy-talk.nl.

### Cookies

Cookies are small files that your browser stores on your device in a directory designated specifically for this purpose. These cookies can be used for example to find out whether you have already visited a website. Most browsers accept cookies automatically. Nevertheless, you can change the settings in your browser, so that no cookies are stored or so that your explicit agreement is required before any cookies are stored. You can also delete previously set cookies at any time. Please note that disabling cookies may result in your use of our website being restricted.

We need cookies to: (a) remember information so that you will not have to re-enter it during your visit or the next time you visit the site; (b) provide custom, personalized content and information; (c) to provide and monitor the effectiveness of our service; (d) to monitor and aggregate metrics such

as total number of visitors, traffic, and demographic patterns; (e) to diagnose or fix technology problems and (f) to help you efficiently access your information after you sign in.

### **Data protection**

We have taken technical and organizational measures to secure your data against potential risks, such as unauthorized login or access, unauthorized perusal, amendment or distribution, and against loss, deletion or misuse.

We offer encrypted communications between webserver and browser, through standard SSL encryption.

Your personal data, such as profile information or chat messages, may become publicly available; your chat partners may disclose information, hackers may gain unauthorized access to our systems, or third party websites or suppliers may leak sensitive information by mistake. We recommend that you exercise caution in disclosing any information, personal or otherwise, during a chat session.

# Our policy on children's information

If you are a parent and you learn that your child is using Buddy Talk and you don't want them to, please contact info@buddy-talk.nl.

# **Registration and authentication**

By registering or authenticating, users allow Buddy Talk to identify them securely and give them access to its services. Depending on what is described below, third parties may provide registration and authentication services. In this case, Buddy Talk will be able to access some data stored by these third-party services for registration or identification purposes, with the user's explicit consent:

• Facebook Authentication (Facebook, Inc.): Facebook Authentication is a registration and authentication service provided by Facebook, Inc. and is connected to the Facebook social network. The personal data collected is various types of data as specified in the privacy policy of the service. Place of processing: United States – Privacy Policy. Privacy Shield participant.

### Hosting and backend infrastructure

This type of service has the purpose of hosting data and files that enables Buddy Talk to run and be distributed, as well as providing a ready-made infrastructure to run specific features or parts of Buddy Talk. Some of these services work through geographically distributed servers, making it difficult to determine the actual location where personal data is stored.

Digital Ocean is a hosting and backend service, storing personal information such as profile information and chat messages, for the purposes of offering you a functional and user-friendly online experience. Please visit <u>DigitalOcean.com</u> for further information about their policies.

Laravel Forge is a provisioning service that has access to the webserver for the purpose of installing and updating necessary services.

### Web and mobile analytics

The services contained in this section enable us to monitor and analyze web and mobile traffic and can be used to keep track of how Buddy Talk is used by users.

• Analytics collected directly (Buddy Talk): Buddy Talk uses an internal analytics system that does not involve third parties. Personal Data collected: cookies and usage data.

- Google Analytics (Google Inc.): Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google utilizes the data collected to track and examine the use of Buddy Talk, to prepare reports on its activities and share them with other Google services. Google may use the data collected to contextualize and personalize the ads of its own advertising network. Personal Data collected: cookies and usage data. Place of processing: United States – Privacy Policy– Opt Out. Privacy Shield participant.
- Google Analytics for Firebase (Google Inc.): Google Analytics for Firebase or Firebase Analytics is an analytics service provided by Google Inc. In order to understand Google's use of data, consult Google's partner policy. Firebase Analytics may share data with other tools provided by Firebase, such as Crash Reporting, Authentication, Remote Config or Notifications. The user may check this privacy policy to find a detailed explanation about the other tools used by the owner. Buddy Talk uses identifiers for mobile devices (including Android Advertising ID or Advertising Identifier for iOS, respectively) and technologies similar to cookies to run the Firebase Analytics service. Users may opt out of certain Firebase features through applicable device settings, such as the device advertising settings for mobile phones or by following the instructions in other Firebase 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. Privacy Shield participant.

# Location-based services

Buddy Talk may collect, use, and share user location data in order to provide location-based services. Most browsers and devices provide tools to opt out from this feature by default. If explicit authorization has been provided, the user's location data may be tracked in order for Buddy Talk to show Buddy Talk partners nearby. Personal data collected: geographic position.

### Rights of our users as "data subjects"

As a Buddy Talk user, you have the right to access, rectification, right to object, to complaint, erasure and blockage. More specifically:

- You have the right to request information about whether and which personal data is processed by our organization. You also have the right to demand that your personal data is rectified or amended.
- Under certain circumstances, you have the right to request that your personal data should be deleted, e.g. by sending this request to info@buddy-talk.nl.
- You can withdraw your consent to the processing and use of your data completely or partially at any time with future application.
- You have the right to obtain your personal data in a common, structured and mechanically readable format, which can be requested via info@buddy-talk.nl.
- If you have any questions, comments, complaints or requests in connection with our statement on data protection and the processing of your personal data, you can also contact us via info@buddy-talk.nl.
- You also have the right to complain if you believe that the processing of your personal data is in violation of the legislation.

### Date of issue of this data privacy statement

25.05.2018

We reserve the right to make amendments at any time to this data privacy statement for future effect.