

# Data Privacy Policy

Thank you for installing our app.

## Declaration of Consent to Data Processing

**By downloading and using the app you are consenting to the data processing as described in this Data Privacy Policy.**

**With using the app, we collect measurements from connectivity tests, as well as system and usage parameters and provide those anonymized to our partners. You can access some aggregates of the collected information, like your network statistics, in dedicated screen(s) within the app.**

## Data Privacy – What we stand for

Team Win LLC, 5800 NE Coral Drive, Lee's Summit, MO 64064, USA ("TWRP") and our partner umlaut insight GmbH, Am Kraftversorgungsturm 3, 52070 Aachen, Germany, are aware that you consider a particularly safe handling of all your personal data as extremely important. Therefore, we guarantee that all your data is processed by us in accordance with the provisions of the relevant EU legislation, as implemented in Germany.

You can always retrieve this Data Privacy Policy in the app.

## What information is collected

This app does only collect so-called pseudonymous data. This is information that is not directly associated with the real-life identity of the user (and which could not be used to identify them individually), for example, the type of internet connection or the measured velocity and location. At the latest after six months, the pseudonym is automatically replaced by a new random number. Information collected will at NO time be associated with names, email addresses or phone numbers of users.

The app is using ACRA as a crash analysis framework which may submit crash logs to umlaut insight.

In NO case do we collect content information such as messages or passwords.

In addition to the results of the tests run in the app other localization information and technical (system) parameters are obtained. Some technical parameters (such as wireless network information) are collected periodically, e.g. subject to GPS localization events.

As far as IP-addresses are concerned, those will be masked on collection within the app, by removing the last three digits; therefore, a correlation to a single user is no longer possible.

Specifically, the following data will be collected from the user's device and analyzed:

Measurement results of the tests run in the app (active measurements "Connection Test")

- Internet availability / success ratio
- Download time

- Latency (“ping”)

Measurement data collected through use of the device (passive measurements)

- Download speed
- Upload speed
- Dropped calls
- Wireless access technology
- Coverage / signal strength

System and usage parameters

- User ID (pseudonymous random number)
- Wireless network information (e. g. network operator, Cell ID, signal strength, SSID)
- Device information (e. g. model, operating system)
- Location information (e. g. longitude / latitude)
- Usage information (e. g. transferred amount of data, call logs)
- App usage (e. g. of all installed apps, their usage time, duration, volume and location)
- Time information (e. g. time stamps of the measurements)
- Other system information (e. g. battery status, memory usage, connected devices)
- Release information (e. g. app build, data formats)

The regular execution of the connection test and the collection of the system and usage information take place in the background.

### **Purpose of Data Collection**

The data collected is used statistically, with the purposes of supporting the development and improvement of communication networks as well as usage-related analyses.

### **Transfer of Information**

With acceptance of the Data Privacy Policy, you agree that the information described above, is stored and can be transferred anonymously to our partners.

Personally identifiable data (like name, phone number or email address) are NOT collected and, therefore, can at no time be transferred to third parties. The collected pseudonymous data are only transferred in context of their analyses to our partner umlaut insight.

Lawfulness of data processing is your consent according to Art. 6 (1) a) of GDPR.

### **Right of the Data Subject**

You have the right of access, rectification, erasure, restriction of processing, notification obligation regarding rectification, erasure, and restriction of processing, data portability and objection.

You have the right to lodge a complaint with a supervisory authority.

To do so, please contact us free of charge. You can also contact our Data Privacy Officer at the e-mail address [ins.datenschutz@umlaut.com](mailto:ins.datenschutz@umlaut.com)

## **Opt-out**

**You always have the option to uninstall the application. With the application being uninstalled, the collection of information is stopped immediately and respective data is erased from your device.**

## **Final Provisions**

German law applies to the exclusion of the UN purchase law.

TWRP and our partner umlaut insight reserve the right to update this Data Privacy Policy.

*Last modified: 26th March 2018*

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