

## **Privacy Policy**

*This privacy Policy governs your use of the Blooloc Software Application for the purpose of yooBee - Wayfinding ("Application") for mobile devices. The Application provides indoor maps, routes and directions and turn-by-turn navigation along with related directories and content to address the wayfinding needs of Blooloc's affiliates and respective users.*

*This Privacy Policy includes information about the personal data collected by BLOOLOC, as well as the manner in which BLOOLOC uses and processes this personal data.*

*BLOOLOC wishes to emphasize that it always attempts to act in accordance with (i) the Belgian Privacy Law of 8 December 1992 on privacy protection in relation to the processing of personal data (i.e. as long as still in force), (ii) the EU Regulation of 2016 concerning the protection of individuals with regards to the processing of personal data, regarding the free movement of such data and repealing Directive 95/46/EC and/or (iii) all (future) Belgian laws regarding the implementation of this Regulation.*

### **Types of personal data**

- Device sensor data (GPS, iBeacon measurements, motion sensors) that can be used to calculate a user's position over time;
- A user's position over time;
- Device characteristics data (type, model);
- A user identification for access to personalized experience and appointments already registered in a third party system.

### **Methods of personal data collection**

Device sensor data is collected as the user is using the Application, from which the user's position itself is located, to make use of wayfinding to navigate to a certain place.

The calculated position may be collected, anonymously, for statistics purposes.

User identification and/or an initial navigation target and/or a session identification is collected by transmission in a referral URL or any other entry point into the Application.

### **Use of personal data**

This Application does collect and store precise information about the location of your mobile device when the application is open. This is necessary in order to provide turn-by-turn indoor navigation to address your wayfinding needs and other location-based features to improve your experience with BLOOLOC's affiliates.

Depending on the location, the timestamped calculated positioning data may also be transmitted anonymously for location-based analytics to third parties.

The user identification (which may or may not be pseudonymized), which was passed on by a third party may be forwarded to the same third party, together with location information, to get access to personalized services within the Application, such as personalized messages and instructions, appointment overviews, automated location based services, etc... Personalized information may be stored within the Application for convenience.

Processing takes place on the following legal grounds, as the case may be and for which you have given consent to the processing of your personal for one or more specific purposes:

- Processing is necessary for the performance of the agreement with BLOOLOC or in order to take steps at your request prior to entering into an agreement
- Processing is necessary for compliance with a legal obligation to which BLOOLOC is subject
- Processing is necessary in order to protect your vital interests or of another natural person
- Processing is necessary for the performance of a task carried out in the public interest
- Processing is necessary for the purposes of the legitimate interests pursued by BLOOLOC or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject, which require protection of personal data (in particular when you are a child).

### **Disclosure of personal data to third parties**

BLOOLOC shall not disclose your personal data to third parties, unless it is necessary in the context of providing BLOOLOC services and optimizing them (including but not limited to maintenance works, payment processing, the delivery of services to BLOOLOC (e.g. subcontracting) and database management). In this respect, your personal data may be disclosed to payment providers, software providers, cloud partner, datacenter, external IT-consultants and service providers.

If it is necessary that BLOOLOC discloses your personal data to third parties in this context, the third party is required to use your personal data in accordance with the provisions of this Privacy Policy.

Notwithstanding the foregoing, it is however possible that BLOOLOC discloses your personal data:

- To the competent authorities (i) if BLOOLOC is obliged to do so under the law or under legal or future legal proceedings and (ii) to safeguard and defend our rights;
- If BLOOLOC, or the majority of its assets, are taken over by a third party, in which case your personal data – which BLOOLOC has collected – shall be one of the transferred assets;
- For the purpose of identifying similar profiles to your own, except if you have expressly opted out in this respect.

In all other cases, BLOOLOC will not sell, hire out or pass on your personal data to third parties, except when it (i) has obtained your permission to this end and (ii) has completed a data processing agreement with the third party in question, which contains the necessary guarantees regarding confidentiality and privacy compliance of your personal data.

### **Storage of personal data**

Unless a longer storage period is required or justified (i) by the law or (ii) through compliance with another legal obligation, BLOOLOC shall only store your personal data for the period necessary to achieve and fulfil the purpose in question, as specified in the Privacy Policy under 'Use of personal data'.

### **Your privacy rights**

In light of the processing of your personal data, you enjoy the following privacy rights:

- Right of access to personal data which BLOOLOC possibly has concerning you;
- Right to rectification, completion or update of your personal data;

- Right to delete your personal data ('right to be forgotten') (BLOOLOC wishes to point out that in this context certain services will no longer be accessible and/or can no longer be provided if you delete resp. request deletion of certain required personal data);
- Right to limit the processing of your personal data;
- Right to transferability of your personal data;
- Right to object to/oppose the processing of your personal data;

If you wish to invoke your privacy rights, as defined below, please contact [support@blooloc.com](mailto:support@blooloc.com).

In principle, you can exercise these rights free of charge via the above-mentioned address. In addition, you can always, via your personal account, update, modify and/or verify your personal data which you were required to submit when creating your (demo) account.

### **Security of personal data**

BLOOLOC undertakes to take reasonable, physical, technological and organizational precautions in order to avoid (i) unauthorized access to your personal information, and (ii) loss, abuse or alteration of your personal data.

BLOOLOC shall store all personal data which it has collected in the cloud (with datacenter(s) within the EU). Notwithstanding BLOOLOC's security Policy, the checks it carries out and the actions it proposes in this context, an infallible level of security cannot be guaranteed. Since no method of transmission or forwarding over the internet, or any method of electronic storage is 100% secure, BLOOLOC is, in this context, not in a position to guarantee absolute security.

Finally, the security of your (demo) account will also partly depend on the confidentiality of your password in obtaining access to the App. BLOOLOC will never ask for your password, meaning that you will never be required to communicate it personally. If you have nonetheless communicated your password to a third party – for example because this third party has indicated that it wishes to offer additional services - this third party shall have access to your (demo) account and your personal data via your password. In such cases, you are liable for the transactions which occur as a result of the use made of your (demo) account. BLOOLOC therefore strongly advises you, if you observe that someone has accessed your (demo) account, to immediately change your password and contact us.

### **Cross-border processing of personal data**

Any transfer of personal data outside the European Economic Area (EEA) to a recipient whose domicile or registered office is in a country which does not fall under the adequacy decision enacted by the European Commission, shall be governed by the provisions of a data transfer agreement, which shall contain (i) the standard contractual clauses, as referred to in the 'European Commission decision of 5 February 2010 (Decision 2010/87/EC)', or (ii) any other mechanism pursuant to privacy legislation, or any other regulations pertaining to the processing of personal data.

### **Update Privacy Policy**

BLOOLOC is entitled to update this Privacy Policy by posting a new version on the Website. As such, it is strongly recommended to regularly consult the Website and the page explaining the Privacy Policy, to make sure that you are aware of any changes.

## **Other websites**

The Website may potentially contain hyperlinks to other websites. When you click on one of these links, you may be redirected to another website or internet source that could collect information about you through cookies or other technologies. BLOOLOC does not bear any responsibility, liability or control authority over these other websites or internet resources, nor about their collection, use and disclosure of your personal data. You must check the Privacy Policies of these other websites and internet sources in order to be able to judge whether they act in accordance with the Privacy Legislation.

## **Contact BLOOLOC**

If you have questions about this Privacy Policy, or the manner in which BLOOLOC collects, uses or processes your personal data, please contact us:

- Via e-mail: [info@blooloc.com](mailto:info@blooloc.com) or
- Via post: NV BLOOLOC, Kempische Steenweg 311, bus 1.02, 3500 Hasselt (Belgium)

In case you are not satisfied with the way BLOOLOC handled your questions and/or remarks or have any complaints about the way BLOOLOC collects, uses and and/or processes your personal data, note that you have the right to lodge a complaint with the Privacy Commission.