

# Privacy policy

**The effective date:** 3 May 2018

Welcome to DEALERBAG ("DEALERBAG", "we" or "our" in various case forms). DEALERBAG provides you with a fast, convenient and interesting way to share your content to other people.

- Our Privacy Policy regulates the collection, usage, transferring and protection of information by us and some of the companies we cooperate with when using our mobile services, the site and any other software provided in DEALERBAG services or in connection with them (= with the "Service" ), as well as your ability to manage the collection and usage of your personal information.

- Using our Service, you agree that we provide you with a platform for publishing content, including documents, photos, comments and other information ("User Content"), in our Service and for the public User Content's distribution. This means that other Users may search, view, use or distribute any User Content you've shared with the Service, in accordance with the terms of our Privacy Policy and our Terms of Use (the link: <http://dealerbag.com/legal/terms>).

- Our Policy applies to all visitors, users and other persons who have an access to the Service ("Users").

## 1. The information we collect.

We collect such information, as:

- Your user name, password and email, the address you've entered when registering a DEALERBAG account.
- The information you've entered in your user's profile (for example, name and surname, photo, phone number). With this information, you and other users can be "found" in DEALERBAG.
- The user's content (for example, photos, comments and other materials) published in the Service.
- The Correspondence between you and DEALERBAG. For example, we can send you email letters related to the Service (such as registration confirmation, information about changes and Service's functions updates, technical and security notifications). Please note that you can not opt-out of email, which are related to the Service.

### Analytical information:

- We use third-party analysis tools to assess traffic and trends in the use of the Service. These tools collect information sent by your device or our Service, including information about the pages you've visited, browser extensions and other information that can help us to improve the Service. We collect and use this analytical information with analytical information received from other Users, so, it is objectively impossible to determine the identity of any particular User.

### Cookies and similar technologies:

- When you visit the Service, we may use cookies and other similar technologies (for example, pixels, web beacons and local storage) to collect information about how you use DEALERBAG, and provide you with relevant functions.

- We can contact advertisers or other partners to deliver advertisements or services to your devices. So, we can use cookies or similar technologies posted by us or third parties.

### Log file information:

- The log file information is automatically sent by your browser every time when you request access to a web page or application (= visit them). It can also be provided when the content of a web page or application is downloaded to your browser or to your other device.

- When you use the Service, our servers automatically record certain information for the log file, including information about your requests, IP address and browser type; page you've entered the site; the page you've left the site; addresses of the pages, the number of clicks and

interaction with Service links; domain names, landing pages, pages viewed and other similar information. We can also collect all this information from email. Using those letters sent to our users we are able to track messages which were taken by recipient. This information helps to make reports more accurate and improve the Service.

#### **Device IDs:**

- When you use a mobile device (such as a tablet or phone) to access our Service, we can access your device's "ID", collect, track and store on your device and / or one or more (remotely) device IDs. Device identifiers are small data files or similar data structures which are stored on your mobile device (or connected with it) and identify it uniquely. The device identifier may be data, which are stored in connection with the device hardware; data that is stored in connection with the operating system or other device software; or data that is sent by DEALERBAG to the device.

- The device identifier can provide us or an external partner with information about how you navigate and use the Service, which can help us or others to compose reports or personalize advertisements and other content. Some of the Service's functions may not work correctly if the device IDs are partially or completely unavailable.

#### **Metadata:**

- Metadata is, as a rule, technical data related to User Content. For example, Metadata can describe as the information about how, when and by whom any part of the User Content was received and how that content was formatted.

- Users can add Metadata to their User Content (or they can be added by the other party), including a hashtag (for example, to mark keywords when publishing photos), geometry (for example, to mark their location in the photo), comments or other data . Thus, your User Content becomes more accessible for search and interaction. If you mark a location in the photo or place tags with other APIs, the latitude and longitude of your location will be stored along with the photo and [will be available for search](#) (for example, to search the location or map), if you indicated your photo as public in your privacy settings.

## **2. HOW WE USE YOUR INFORMATION**

In addition to some of the specific uses of information described in this Privacy Policy, we may use the information obtained to:

- help you quickly access your information after logging on;
- remember information so that you do not have to re-enter it during the current or next visit to the Service;
- provide you and others with personalized content and data, which may include advertisements on the Internet or other marketing materials;
- provide work, improve, test and monitor the effectiveness of the Service;
- develop and test new products and functions;
- Track metrics, such as the total number of visitors, traffic and demographic composition;
- diagnose or correct technical problems;
- automatically update the DEALERBAG application on your device;
- DEALERBAG users or other Users can organize contests, special offers or other events and events ("Events") within the Service. If you do not want to participate in the Event, do not use specific Metadata (such as a hashtag or geo-tag) associated with this Activity.

## **3. YOUR PERSONAL DATA TRANSFERRING**

We do not provide or sell your personal data to third parties which are not related to DEALERBAG without your permission, except the obstacles described in this Privacy Policy conditions.

#### **The third parties with which we share your personal data:**

- We may transfer User Content and information about you (including information obtained with cookies, log files, device IDs, site usage and location data) to companies that are legal parts of a group of companies, which includes DEALERBAG, or become part of this group ("Affiliated companies"). Affiliated companies can use this information to assist in the provision, studying and improvement of the Service (by providing statistical data as well) and the services of the Affiliated Companies (by improving the quality and relevance of the materials as well). However, these Affiliated companies will consider your privacy settings.
- In addition, we can transfer your information, as well as information obtained through such tools as cookies, log files, device IDs and location data, to third-party organizations that help us to provide you with the Service ("Service Providers" ). Our Service Providers have access to the part of your information necessary to provide the Service, based on reasonable confidentiality conditions.
- We can also provide certain information (for example, data from cookies) to third-party advertising partners. This information will allow third-party advertising organizations, among other things, to offer you advertisements, which, in their opinion, will be most interesting to you.
- We can delete some of the data by which you can identify your identity and pass on impersonal data to third parties. In addition, we can combine your information with other information in such a way that it can not be linked to you, and share this common information with third parties.

#### **Parties to which you can give your User Content access:**

- Any information or content to which you open access when publishing in the Service (for example, User Content) becomes publicly available in accordance with the privacy settings you have chosen. To change your privacy settings in the Service, you should change your profile settings. Once you've published the User Content or make it public, other people will be able to share your User Content.

- Depending on your profile and privacy settings, any User Content that you make public can be displayed in a search for other Users or used by the DEALERBAG API. Using the DEALERBAG API is governed by the API Terms of Use, which includes the terms of Privacy Policy.

- If you delete information published by you in the Service, its copies may remain available in the cached and archived pages of the Service or if other Users or third parties use the DEALERBAG API to copy or store this information.

#### **What happens when the owner changes:**

- If we sell or transfer DEALERBAG or our assets to another organization, [partially or totally](#) (for example, as a result of merger, affiliation, bankruptcy, liquidation, dissolution), your information (for example, name, email address, User content and any other information collected from the Service) can be sold or transferred along with the rest of the assets. At the same time, you remain the owner of your User Content. The buyer or the acquirer will have to comply with the obligations we have accepted in this Privacy Policy.

#### **Response to official requests and prevention of harm:**

- We can access, store, and transmit your information in response to an official request (for example, a search warrant, court order or summons), if the request was made legally. Among other things, we can respond to official requests from countries (beyond the United States) if we have sufficient grounds to believe that the response should be provided under the laws of that country or territory, affects users in that country or territory and it is not contradict to international standards. We can also access, store and transmit information, if we have sufficient grounds to believe that it is necessary to detect, prevent or suppress fraud or other illegal activities; to protect

yourself, you and others, including the criminal investigation; or to prevent death or an immediate threat to health. We can access and retrieve information about you, process it, and store it for a longer period of time if it is the subject of an official request or legal obligation, an investigation of the government or an investigation of possible violations of this privacy policy, or in other cases to prevent harm.

#### **4. HOW WE KEEP YOUR INFORMATION**

Storage and handling:

- Your information collected with the Service can be stored and processed in the US or any other country where the equipment of DEALERBAG, our Affiliated Companies or Service Providers is located.

- DEALERBAG, our Affiliated Companies or Service Providers may transfer information collected about you (including personal information) from your country or territory to other countries or to other parts of the world. If you are in the European Union or other regions where the laws for the collection and use of information differ from relevant laws of the United States, please, note that we can transfer information (including personal information) to the country or territory where data protection laws may be different from the laws of your country or territory.

- By registering in the Service and using it, you consent to the transfer of information to the US or any other country where the DEALERBAG equipment, our Affiliated Companies or Service Providers are located, and to use and disclose information about you in accordance with the this Privacy Policy .

- We use commercially reasonable precautions to ensure the security of information collected with the Service and take reasonable actions (for example, request a unique password) to identify your identity before giving you the access to your account. Nevertheless, DEALERBAG can not ensure the complete security of any information that you transmit to DEALERBAG, or guarantee that the information in the Service will not be available to other persons, disclosed, changed or destroyed.

- Please take precautions for your part to help us. You are responsible for keeping in secret your unique password and account information, as well as for controlling access to electronic correspondence between you and DEALERBAG. Your privacy settings can also change as a result of changes in the social networking services that you connect to DEALERBAG. We are not responsible for the functionality, confidentiality or security measures of any other organization.

#### **5. PERSONAL SETTINGS CONCERNING YOUR INFORMATION**

**Account information, profile and privacy settings:**

- You can update the information in your account at any time by logging into our website and changing your profile settings.

- As already mentioned, you can not refuse to receive messages related to the Service (for example, account confirmation, confirmation and reminder of purchases and invoices, changes and updates of the Service's functions, security notifications and technical issues).

**How long we store User Content:**

- After deleting or deactivating your DEALERBAG account, our Affiliated Companies or Service Providers may store information (including your profile information) and User Content during a commercially reasonable period of time in order to create backup copies and archives, and for audit purposes.

#### **6. CONFIDENTIALITY OF CHILDREN'S INFORMATION**

DEALERBAG intentionally does not collect or request any information from people under the age of 18, and does not allow such persons to register with the Service. The service and the content placed therein are not intended for persons under 18 years of age. If we would be known the receiving personal information from a child under the age of 18 without parental consent, we will remove this information as soon as possible. If you believe that we may have information about a child under the age of 18 or information received from him, please contact us.

## **7. OTHER SITES AND SERVICES**

We are not responsible for the information processing on other sites or services that contain links to our Service or links to them in our Service, including information or content placed on them. When clicking on a link from our Service to another site or to another service, remember that our Privacy Policy does not apply to these third-party sites and services. When you visit or use any third-party site or service, including those linked to our site, the rules and policies of this third-party site or service apply to you. In addition, you agree that we do not control and are not responsible for third parties to whom you give the access to your User Content. If you use a third-party site or service and give them access to your User Content, then you do so at your own risk.

## **8. HOW TO CONTACT WITH US IN THE CASE OF USER'S DEATH**

Contact us in case of DEALERBAG user's death. Usually we correspond with email. If you need more information, we will contact you by email address you've written in your request letter.

## **9. HOW TO CONTACT US**

If you have any questions about the Privacy Policy or the Service, please visit the Help Center to find a comfortable way to contact us.

## **10. YOUR RIGHTS**

Subject to applicable law, you may have some or all of the following rights in respect of your Personal Information:

**Access to own Personal Information:** You may have the right to request an overview of your Personal Data in accordance with applicable law. In such a case, where reasonably possible, the overview shall contain information regarding the source (if reasonably available), type, purpose and categories of recipients of the relevant Personal Information. You may also have the right to obtain a copy of the Personal Information held about you. Such right of access can normally be exercised free of charge, however we reserve the right to charge an appropriate administrative fee where permitted by applicable law, for instance where you request multiple copies of your information.

**Accuracy and right of rectification:** DEALERBAG seeks to ensure that your Personal Data is accurate, complete and kept up-to-date to the extent reasonably necessary for the purposes described herein. If the Personal Information is incorrect, incomplete or not processed in compliance with applicable law or this Policy, you may have the right to have your Personal Information rectified, deleted or blocked (as appropriate) in accordance with applicable law.

**Right to object to or withdraw consent:** In certain circumstances (e.g., where your Personal Information is processed on the basis of DEALERBAG's legitimate interests), you may have the right to object to the processing of your Personal Information on the basis of compelling grounds related to your particular situation and in accordance with applicable law. For instance, you may have the right to request that DEALERBAG does not process your personal data for marketing purposes. In such a case, you can control your initial marketing preferences by ticking the relevant box situated on the form on which your data is collected (the registration form). Thereafter, you can follow the opt-out links or unsubscribe directions in emails or SMS messages.

If the processing of your Personal Information is based on your consent, you may have the right to withdraw your consent to such processing at any time. It is worth noting that the withdrawing of consent has no impact on earlier processing on such basis, and does not prevent DEALERBAG from invoking another legal basis for the processing of the relevant Personal Information.

**Right to lodge a complaint:** You may have the right to lodge a complaint before the relevant data protection authority or supervisory authority.

To exercise these rights, where applicable, please contact DEALERBAG at [privacy@DEALERBAG.com](mailto:privacy@DEALERBAG.com) or use the appropriate functionality in the App or Site. In this context, DEALERBAG asks that you provide it with one form of photographic identification so that DEALERBAG can verify your identity.

From time to time DEALERBAG may post links to third-party websites on the Site and/or in the Services. These links are provided as a courtesy to DEALERBAG's users and visitors and are not administered or verified in any way by DEALERBAG. Such links are accessed by you at your own risk and DEALERBAG makes no representations or warranties about the content of such websites including any cookies used by the website operator. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that DEALERBAG does not accept any responsibility or liability for these policies. As a result, DEALERBAG strongly recommends that you read the privacy policies of any third-party websites before you provide any personal data to them.

## **11. CHILDREN**

Neither the Site nor any of the Services are directed or targeted to children under the age of 18, and DEALERBAG does not knowingly collect personally identifiable information from children under the age of 18. DEALERBAG requires users under 18 years of age to obtain the consent of a parent or guardian, to view the Site or use the Services. If DEALERBAG learns that a child under 18 years of age has provided personally identifiable information to the Site, it will use reasonable efforts to remove such information from its files. No part of our Service is directed towards children under the age of 18 and we do not want Personal Information from children under the age of 18. If you believe that a child under 18 years of age has given us Personal Information, please contact DEALERBAG via our Help Center.

## **12. CHANGES TO PRIVACY POLICY**

DEALERBAG may change or update this Privacy Policy from time to time, so we ask you to review it periodically. We can provide you with additional forms of changes or updates notification in accordance with the circumstances. If you continue to use DEALERBAG or Service after making changes to the Privacy Policy, it will mean that you agree with such changes