

## Privacy Policy of SoleCall app and website

### Introduction

SoleCall Ltd (Provider) is developing a personal safety app that can be activated with and without manual intervention. SoleCall Ltd respects your privacy and is committed to protecting your personal data. This privacy statement will inform you as to how we look after your personal data when you visit our website or use the SoleCall app.

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### 1. Details

#### Controller

We inform you that SoleCall Limited is the controller and responsible for your personal data (collectively referred to as "SoleCall", "we", "us" or "our" in this privacy notice). We have appointed a data protection officer (DPO) who is responsible for our privacy policy. If you have any questions about this privacy statement, please contact the DPO using the e-mail address set out below.

Company details:

Full name of legal entity: Solecall Limited

Postal address and headquarters: 1162 Budapest, Árpádföldi út 90/3

Company register number: 01 09 286619

Tax number: 25740435242

Name or title of DPO: Gergő Nagy

E-mail address: [info@solecall.hu](mailto:info@solecall.hu)

#### Processor

We employ dedicated external data processor for the operation of our website:

#### Website operator:

Magyar Hosting Kft.

Address: 1132 Budapest, Victor Hugo u. 18-22

E-mail: [info@mhosting.hu](mailto:info@mhosting.hu)

In such cases like Questionnaires, or feedbacks we employ external data processor:

Name: Google LLC

Headquarter: 1600 Amphitheatre Parkway, Mountain View, CA 94043, United States of America.  
Platform: Google Forms (docs.google.com)

You have the right to make a complaint at any time to the Hungarian Information Commissioner's Office , the HU supervisory authority for data protection issues: Nemzeti Adatvédelmi és Információszabadság Hatóság, Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c., Telefon: +36 (1) 391-1400; Fax:+36(1)391-1410., <http://www.naih.hu> e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu) (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## 2. Data we collect

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

**Identity Data** includes first name, last name, e-mail address.

**Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

**Usage Data** includes information about how you use our website, products and services.

**Sensor data** includes accelerometer, orientation, light, temperature and proximity sensors and additionally battery and wifi status.

**Location Data (GPS)** When the application is opened it requests the GPS coordinates to be able to locate the place of the emergency for the security contacts. The provider does not store GPS data.

## 3. How is your data collected?

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your Identity, Contact details by filling in forms or by corresponding with us by email or otherwise. This includes personal data you provide when you:

- logging in to our app (Name and E-mail)
- uploading the sensor data via WiFi connection
- answer questionnaires or send us feedback about the app

By using the app you generate sensor data (from accelerometer, orientation, light, temperature sensors). Uploading takes place automatically if you are connected to WiFi and the app is opened.

Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, [server logs] and other similar technologies.

Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below:

Technical Data from the following parties:

- analytics providers such as Google based outside the EU;
- search information providers.

#### **4. How we use your data?**

We will use your personal data in the following circumstances:

- To manage our relationship with you (personal data: Name, E-mail)
- To use data analytics to improve our website, app, customer relationships and experiences
- To improve our gesture recognition through training the machine learning models (sensor data)

#### **Cookies**

It's a file which has within it an identifier (i.e. a combination of letters and numbers) that a web server sends to a browser to be stored by that browser. This assists the server in more quickly identifying the browser – as each time that this browser requests a page from the server it sends this identifier back to the server. We may use both "session" cookies and "persistent" cookies on the website. Session cookies will be deleted from your computer when you close your browser. Persistent cookies will remain stored on your computer until deleted, or until they reach a specified expiry date. We will use the session cookies to: keep track of you whilst you navigate the website; keep track of items in your shopping basket; prevent fraud and increase website security; and other uses. We will use the persistent cookies to: enable our website to recognise you when you visit; keep track of your preferences in relation to your use of our website; and other uses. We use Google Analytics to analyse the use of this website. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated relating to our website is used to create reports about the use of the website. Google will store this information. Google's privacy policy is available at: <http://www.google.com/privacypolicy.html>. Most browsers allow you to reject all cookies, whilst some browsers allow you to reject just third party cookies.

#### **Change of purpose**

We will only use your personal data for the purposes for which we collected it.

#### **5. Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

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

#### **6. Data retention**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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 requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us.

In some circumstances we may 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.

## **7. Advertising**

The app is ad free.

## **8. Your legal rights**

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

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.

If you wish to exercise any of the rights set out above, please contact us via e-mail [info@solecall.hu](mailto:info@solecall.hu) .