

PRIVACY POLICY „Cruster“

This privacy policy ("Privacy Policy") governs how we, Tögel & Daut ("we", "our" or "us") use, collect and store information pertaining to you ("User", "you"), user of Cruster mobile application ("App").

Please take a moment to familiarize yourself with our privacy practices and contact us if you have any questions.

This Privacy Policy explains:

- What information we collect and why we collect it.
- Your rights and choices with regard to that information.
- The steps we take to protect that information.
- Limitations with regard to third party websites and content.
- How we transfer the information.
- How we may make changes to our Privacy Policy.
- How you may contact us.

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WHAT INFORMATION WE COLLECT AND WHY WE COLLECT IT

"Personal Information" means any information about an identified or identifiable individual.

In many cases data is generated automatically (inherent) to you using a computing device or automatically (inherent) when transmitting data over computer networks, such as the Internet. This data may include IP-addresses, date and time of your requests, operating system type, analytic data and crash reports.

We do not use information about you that is automatically (inherent) generated while you use our services, and we do not collect it.

We do not, in particular, store or use Personal Information generated automatically (inherent) while you use our services!

We may collect/use information only for the purposes stated below, and then only for a limited period of time, after which it is destroyed:

- a) Communicate with you
 - (1) We may keep a record of your requests & feedback you sent via email, in order to help solve any issues you might be facing and to improve the content of the app.

- b) Protect Tögel & Daut, our users, the public and for Legal reasons
 - (1) To enforce the Terms of Use or Privacy Policy;
 - (2) To comply with any applicable law and assist law enforcement agencies under any applicable law
 - (3) To detect abuse and illegal activity; to detect and prevent fraud, misappropriation, infringements, identity theft and other illegal activities and misuse of our services;
 - (4) To handle breakdowns and malfunctions;
 - (5) To take any action in any case of dispute, or legal proceeding of any kind between you and the App, or between you and other users or third parties with respect to, or in relation with the App;
 - (6) For purposes provided under this Privacy Policy and Terms of Use;
 - (7) To help improve the safety and reliability of our App.

We do not sell or rent the information to marketers or third parties.

We may, however, share or disclose the information as follows:

- a) Members of our group.

We may share the information to any members of our group, subsidiaries and branch offices, to which it is reasonably necessary or desirable for us to disclose the information in order to carry out the above-mentioned information processing purposes.

b) Compliance with laws and law enforcement.

We will share the information if we, in our good faith judgment, believe it is necessary to:

- (1) investigate and defend ourselves against any third-party claims or allegations;
- (2) comply with laws and legal process (including valid subpoenas, court orders, or government requests);
- (3) take precautions against liability and protect the property, rights, and safety of our App users or others as required or permitted by law;
- (4) enforce our Terms of Use or other agreements;
- (5) prevent or stop activity we believe to be illegal, fraudulent, abusive, unethical or legally actionable; and
- (6) detect, prevent, or otherwise address fraud, the security or integrity of our App or equipment used to make the App available, or any other technical issues.

c) Other Disclosures.

We may disclose the information in other ways when we have your consent to do so.

PURCHASE OF APPLICATIONS VIA APP STORES

The purchase of our apps is done via special online platforms operated by other service providers (so-called "app stores"). In this context, the data protection notices of the respective app stores apply in addition to our data protection notices. This applies in particular with regard to the methods used on the platforms for web analytics and for interest-related marketing as well as possible costs.

a) Processed data types:

- (1) Inventory data (e.g. names, addresses),
- (2) Payment Data (e.g. bank details, invoices, payment history),
- (3) Contact data (e.g. e-mail, telephone numbers),
- (4) Contract data (e.g. contract object, duration, customer category),
- (5) Usage data (e.g. websites visited, interest in content, access times),
- (6) Meta/communication data (e.g. device information, IP addresses).

b) Data subjects:

- (1) Customers.

c) Purposes of Processing:

- (1) Provision of contractual services and customer support.

d) Legal Basis:

- (1) Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

Services and service providers being used:

- a) Apple App Store:
App and software distribution platform;
Service provider: Apple Inc., Infinite Loop, Cupertino, CA 95014, USA;
Website: <https://www.apple.com/ios/app-store/>
Privacy Policy: <https://www.apple.com/privacy/privacy-policy/>

- b) Google Play:
App and software distribution platform;
Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA;
Website: <https://play.google.com/store/apps?hl=en>
Privacy Policy: <https://policies.google.com/privacy>

YOUR RIGHTS AND CHOICES

Subject to applicable law, you may have the right to request access to and receive information about the data we collect about you, update and correct inaccuracies in your information, and have the information blocked or deleted, as appropriate. You also have the right to withdraw your consent to the collection of your Personal Information. You may at any time stop the collection of your information via the settings of your device, or by uninstalling the App. Note however that if you exercise your right of blocking or deletion, if you decline to share certain information with us, or if you withdraw your consent, we may not be able to provide to you some of the features and functionalities of the App.

To exercise your rights and choices to your Personal Information, please contact us by using the contact details provide below under "Our Contact Information".

INFORMATION SECURITY

We maintain technical and organizational measures intended to protect the information that we collect against unauthorized or unlawful processing and against accidental loss, destruction or damage.

THIRD PARTY WEBSITES AND CONTENT

Our App may provide links to other websites for your convenience and information. These websites may operate independently from My Pilot´s Handbook. Linked websites may have their own privacy notices or policies, which we strongly suggest you review if you visit any linked websites.

CHANGES TO OUR PRIVACY POLICY

We may revise this Privacy Policy from time to time. When we do, we will post the revised policy and the revised version will be effective when it is posted.

OUR CONTACT INFORMATION

If you have any questions about this Privacy Policy and the way in which we handle the information that we collect, or to exercise your rights and choices, please contact us at

privacy@toegel-daut.de

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