

# Privacy and Cookie Policy

## 1. IN GENERAL

1.1. We, the team of Kippy srl, IT08263160965 , via Lombardini, 10 20143 Milano, Italy – “Kippy”, process your personal data when you use our Website, WebApp, Hardware, Apps or Tools - “Products”.

1.2. Controller. The controller for the data processing within the meaning of the GDPR is Kippy. You can contact us via mail (info@kippy.com) or via our Customer Service.

1.3. Data Protection Officer. Our data protection officer within the meaning of the GDPR can be contacted under our email address or via our Customer Service.

## 2. WHICH DATA WE PROCESS

2.1. In General. Kippy processes such personal data, that you as a user of the Products make available to us, for example by using our Products, and that others provide to us.

2.2. Data You Provide to Us.

**Mandatory Information:** You have to provide us with certain information in order to register and access to use most of our products:

- email address or mobile-phone number

In order to purchase a physical or digital product in the Kippy shop, to order a Kippy device and/or to activate a Kippy GPS & Activity Tracker (Kippy Finder, Kippy Vita or others), you have to provide additionally data, such as the following:

- address, zip code, city, country
- phone number
- Payment information: We use payment providers (e.g. Adyen, PayPal, WooCommerce, others) to process payments. Although we do not store any payment credentials information ourselves, we store a payment ID number that is given out by the respective provider and can be allocated to a person by that payment provider.

**Optional Information:** Certain information is optional during registration and can also be added later on by you or can be made available by giving certain rights in the apps, such as:

- date of birth
- address
- gender
- profile picture(s)
- pet related data (not related to owner, eg. Breed and date of birth)
- GPS position of the user’s mobile device (for showing the user position on the map)

### 2.3. Data from Others

The following personal data we retrieve from external services (without being explicitly provided by the user):

- IP address
- language (based on the settings of the browser/mobile phone of the user)
- country (based on the IP address)

## 3. WHY WE PROCESS DATA (PURPOSES)

3.1. Operating the Products. We process your Data to be able to provide you with a seamless user experience when using our products.

*Selling/Shipping Products*. To sell and ship our physical products.

*Providing Services*. To operate the Products and provide the services, including to

- authenticate your access to an account;
- track your pet's location;
- manage detailed information about your pet
- show statistics about your pet
- log and display your pet's physical activities

*Customer Support*. To investigate, respond to your requests, and resolve complaints and service issues, e.g. to contact you about a question you submitted to our customer service team.

3.2. Business Needs. We process your Data to manage our business needs, but only as long as your rights and interests do not outweigh ours. This includes advertisements and general marketing.

*Performance*. We process Data to monitor, analyse and improve the use of our Products and services. As well as protect the security or integrity of the Products as well as their performance and functionality. For example, we analyse User behaviour and perform research about the way you use our Services.

*Research and Development*. We process data, including public feedback, to conduct research and development for the further development of our Products in order to provide you and others with a better, more intuitive and personalized experience, and drive membership growth and engagement in our Products.

*Marketing General*. We process Data to market to you by delivering (tailored) marketing materials about Kippy products and online services or the products and services of Kippy.

*Advertising*. We target and measure the performance of ads to registered users and visitors.

*Newsletter/Push Message Marketing*. With your consent we will send you newsletters with information on pet related topics.

*Retargeting*. You might see marketing messages (ads) on different platforms (e.g. Google, Facebook, ...).

### 3.3. Compliance and Enforcement.

*Compliance*. We process your data to comply with our obligations and to comply with all applicable laws and regulations.

*Enforcement*. We process your data if we think it's necessary for security purposes or to investigate possible fraud or other violations of our terms and conditions or this privacy policy and/or attempts to harm our Members or Visitors.

### 3.4. Newsletter

Kippy only sends newsletters in the following cases:

- The user decides to register for the Kippy newsletter through the website [www.kippy.eu](http://www.kippy.eu).
- The user creates a Kippy user account and at the same time accepts the Terms of Use of Kippy.

Customers can at any point in time cancel the subscription of the Kippy newsletter. By unsubscribing, Kippy will not send any additional emails.

E-Mail newsletters from Kippy are being sent by MailChimp, an email distribution platform by Rocket Science Group (Rocket Science Group, LLC, 675 Ponce De Leon Ave NE #5000, Atlanta, GA 30308, USA)

The E-Mail-addresses of all Kippy newsletter subscribers as well as additional data as described in this document will be stored on servers owned by MailChimp. MailChimp uses the provided information solely for the distribution and analysis on behalf of Kippy. Additionally, MailChimp can use the information to improve its services, e.g. optimizing their technical infrastructure and setup, visualization of newsletters or for economical reasons to detect the region of where newsletter subscribers come from.

MailChimp explicitly does NOT use the data provided, to contact any subscribers and will in no circumstance hand over the data and/or E-Mail-addresses to a third party.

Kippy strongly trusts the reliability and the safety of data and the IT infrastructure from MailChimp. MailChimp is certified under the US-EU-Data-Privacy-Agreement "Private Shield" and therefore does consent to fulfil all EU data privacy laws in that regard. The privacy policy from MailChimp can be found [here](#).

### 3.5. Push-Notifications

Kippy will also send you (based on you allowing this through the Apps) push notifications through its mobile apps. Notifications will be related to Kippy products (Geofence, Safe Zone, Battery status, ...), Kippy App usage and/or information about new Kippy products and services or special offers.

You can disable push notifications for individual apps in your phone settings or uninstall the app to discontinue receiving push notifications.

## 4. USAGE AND DATA TRANSFER FOR THIRD PARTIES

### 4.1. Service Use

#### **Google Analytics & Firebase**

*General.* The Kippy website as well as the Kippy apps use Google Analytics or Google Firebase, a web analysis service of Google Inc. that uses cookies. The information on your usage of the Website created by a cookie, will usually be transmitted to a Google server in the USA and stored there. In case of the activation of the IP- anonymization in the Products, your IP-address will be shortened by Google beforehand within member states of the EU or other members of the Agreement on the European Economic Area. Only in exceptional cases the entire IP-address will be transmitted to a Google server in the US and shortened there. On behalf of the website operator, Google will use this information in order to evaluate your use of the Products, compose reports on the Product activities, and provide further services to the operator related to the Product and internet usage. The IP-address transmitted by your browser within the use of Google Analytics will

not be combined with other data held by Google.

*Purpose.* Kippy uses Google Analytics and Firebase to analyse and be able to constantly improve the use of Kippy Products. Through the statistics, Kippy is able to improve its services and make them more interesting for users and to optimize new features and products. In those special cases in which personal data is transmitted to the USA, Google is certified via EU-US privacy shield. The basis for the processing is Art 6 sec 1 subsec f GDPR.

*Information on Third-Party Provider.* Google Dublin, Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland, Fax: +353 (1) 436 1001; Terms: <https://policies.google.com/privacy>

### **Online Shop Fulfillment/Shipping/Tracking**

For the (partially) automated handling of Kippy online shop orders, Kippy transmits for the shipping required data to a third parties partner for faster and easier fulfillment of orders. Kippy will transmit required information (such as name, shipping-address, email-address and phone number) solely for the purpose of the fulfillment of the order. Kippy currently works with Terashop, but reserves the right to add additional providers in the future. <http://www.terashop.it/InformativaPrivacy.pdf>

### **Payment Service Provider**

All payments to Kippy are handled by external payment providers (Such as Adyen, Paypal, Bancasella, Terashop, ...). In order to capture payments through external payment providers, Kippy transmits the following - for the payment relevant - data to the payment service provider:

- E-mail address
- First Name, Last Name
- Address, Zip Code, City, State, Country (for Fraud Detection)
- Payment Data (e.g. Credit Card Number)

Kippy never stores any Payment Data (e.g. Credit Card Number), but leaves this up to the carefully select payment providers who store your payment details securely.

### **Customer Service Software**

#### *Zendesk*

Kippy uses the customer support software Zendesk, in order to manage and answer customer requests via email, chat and via [www.kippy.eu](http://www.kippy.eu). All requests will be sent to, stored and processed by Zendesk. All personally identifying information sent through a customer support request will therefore be transmitted to Zendesk. Additionally, Zendesk stores the following information:

- Language (through automated language detection)
- IP-address

All personally identifying data are being processed by Zendesk and are only used to solve customer support cases. The privacy policy of Zendesk can be found [here](#).

#### *Phonetica*

Kippy uses the third parties Phonetica (INGO S.p.A. – Via I Maggio 13, 20037 Paderno Dugnano (MI) P.IVA/C.F./Reg. Impr. MI 12591490151) to manage customers issues.

All personally identifying data are being processed by INGO and are only used to solve customer support cases and support the Kippy Customer Service.

<https://www.phonetica.it/informativa-sulla-privacy/>

## **E-Mail-Services**

In order to send emails (aside from newsletters) Kippy could use third parties softwares. For the usage of the above service, the customers E-mail-address, the language, Firstname and Lastname are being transmitted to the service provider. All personally identifying data are being processed by them and are only used to for sending automated and automatically triggered emails.

## **Email Verification**

In order to verify E-mail addresses Kippy send a verification email to the customers.

## **Other services**

Beside the services mentioned above Kippy may uses additional services to ensure high quality of all the Kippy products (e.g. caching services to reduce the response time of requests). It might be the case that personally identifying data is transmitted to those services. Kippy pares the transfer of this data down to the minimum which is required for using the services. The external services process the data on behalf of Kippy and do not use the data for their own benefit. The transferred personal data are mainly IP addresses, but other data, such as their name, may also be processed.

## **4.2. Marketing Services**

### **Retargeting**

Kippy websites and apps use retargeting technologies. This allows us to display advertising on partner websites to customers who previously were interested in Kippy and/or visited the Kippy website.

We are convinced that personalized and interest-based advertising is more interesting and relevant to our customers, compared to advertising without and relevance for the customer. Retargeting technologies analyze the information captured through interactions with Kippy (website, online-shop, apps) as well as through cookies, and displays advertising based on the users surf behavior online.

Kippy uses remarketing services from Google Inc. (AdWords) and Facebook. Kippy remains the right to add additional remarketing providers.

## **4.3. R&D**

### **Data Analysis**

Kippy shares information of the Product to third parties to study and analyse behavior and to create new algorithms to increase the performance of its Products. No personal data of the customer are shared in those cases. Kippy remains the right to select the third parties to conduct the studies.

# **5. COOKIES AND PLUGINS**

## **5.1. Cookies**

The Website use 'cookies' – small text files that are placed on your computer, mobile device and/or stored by the browser. If the respective server of our Website is again accessed by the user, the user's browser sends the afore received cookie back to the server. The server can evaluate the information received in this manner in various ways. Cookies cannot run programs or

infect your computer/mobile device with a virus. Cookies can help to make websites more user-friendly and effective. They can, for example, be used in order to manage advertisements on the Website or to facilitate navigation on a webpage.

What are the different cookie types we use? There are different types of cookies with different uses. Some are there just to allow you to browse the website and see certain features. Some give us an idea on your browsing experience, i.e. when you have trouble finding what you are looking for, so we can improve and make your future visit as pleasant as possible. We use first party and third party cookies for several reasons.

The most important cookies are the required cookies. They are essential and help you to navigate on the website and to use basic features. Then there are functionality cookies that enable you to save your shopping bag and to use other additional features like the live chat. The performance and analytics cookies we use to improve our website. Interaction cookies are used for you to interact with social media. Targeting cookies, advertising cookies and social media cookies capture your preferences in order to show you relevant ads outside Kippy sites. In addition, social media cookies may be used to track your activity over social media platforms.

Kippy uses cookies primarily to ensure your visit to our website is as pleasant as possible, as well as for advertising-related purposes during your future visits to other websites.

You can change your browser settings to delete or prevent certain cookies from being stored on your computer or mobile device without your explicit consent. The 'help' section in your browser should provide information on how to manage your cookie settings.

## 5.2. Plugins

The Kippy Products include social media plugins (e.g. Facebook plugins). Such plugins can recognize a user's IP address and the page visited on the Kippy platform and, possibly, store cookies, so that the services offered by Kippy work properly. Your interactions with these plugins are subject to this privacy policy or the privacy policy of any third party that offers such feature.

**KIPPY IS NOT RESPONSIBLE FOR THE USE OF, OR GUIDELINES REGARDING THE USE OF, PERSONAL DATA BY THIRD PARTY PROVIDERS.**

Users may recognize the respective plugins of third parties, e.g., by the respective logo or other respective characteristic typical for the respective social media-platform on our pages.

If a user interacts with the plugins, e. g. by clicking on the Facebook "Like-Button" or entering a comment, while being logged in to such user's Social Media-account, a user links the contents of the Kippy pages to her respective social media-profile. Thereby, the social media platforms can associate a user's visit or use of the Products with such user's social media-account. Kippy as the provider of the Products does not have any knowledge of the content of the transmitted data or its usage by the social media platforms. Users can find more information on the issue of data transmission in the privacy policy of the respective social media-platform.

If users do not want to have the respective social media-platform associate their visits on our site with their social media-account, users must log out from their social media- account.

## 6. SHARING OF PERSONAL DATA

### 6.1. General.

We transmit Data to third parties only, if this is necessary for the Purposes, due to a request from a national authority, due to a court ruling, required by law, necessary to investigate and defend ourselves against any third-party claims or allegations, exercise or protect the rights and safety of Kippy, our members, personnel, or others, or if you have consented beforehand. We attempt to notify you about legal demands for your personal data when appropriate in our judgment, unless prohibited by law or court order or when the request is an emergency. We may dispute such demands when we believe, in our discretion, that the requests are overbroad, vague or lack proper authority, but we do not promise to challenge every demand.

### 6.2. Service Providers and other Third Party Services.

We transfer your information to others, who help us to provide and improve our Products (e.g. maintenance, analysis, audit, payments, fraud detection, marketing and development). Service providers will have access to your information as reasonably necessary to perform these tasks on our behalf and are obligated not to disclose or use it for other purposes.

## 7. HOW LONG WE STORE DATA

7.1. Storage period. We store your Data as long as you are a registered user of the Products. Beyond that, we only store Data, if it is legally necessary (because of warranty, limitation or retention periods) or otherwise required.

7.2. Account Deletion. If you decide to delete your account, all personal data we have about you will be deleted with the following exceptions:

- All data necessary for the fulfillment of contractual obligations or the observance of the statutory retention requirements by Kippy must not be deleted, but minimized to the extent required.
- Data published by the customer on external services are not revised by deleting the user account.
- Data which serve to uniquely identify a customer (eg e-mail address) is anonymised by the deletion so that it is no longer possible to infer the identity of the user.
- The personal data sent to us by a customer with the deletion request remains stored in our Customer Service Software (Zendesk).

A deletion request does not affect data, if the storage is legally necessary, for example for accounting purposes.

## 8. WHICH RIGHTS YOU HAVE

8.1. Exercise of Rights. To exercise your rights please send a request via e-mail to our email address or via mail to our postal address.

8.2. Revocation of Consent. You can revoke the consent for future data processing at any time. However, this does not affect the lawfulness of Data processing based on the consent before the revocation.

8.3. Right of Access. You have the right to obtain (i) confirmation as to whether or not your Data is being processed by us and, if so, (ii) more specific information on the Data.

8.4. Right to Rectification. You have the right to obtain from us the rectification of inaccurate Data concerning you. In case the Data processed by us is not correct, we will rectify these without undue delay and inform you of this rectification.

8.5. Right to Erasure. Should you decide, you do not want us to process your data any further, please contact us via mail. We'll delete your account and erase your data. Should mandatory provisions of law prevent such erasure, we will inform you.

8.6. Right to Data Portability. You have the right to (i) receive your Data in a structured, commonly used and machine-readable format.

8.7. Right to Object. You have the right to object at any time to the processing of Data for which our legitimate interests are the legal basis, including profiling based on those provisions.

8.8. Right to Lodge a Complaint. You have the right to lodge a complaint with a supervisory authority, if you think that the processing of Data infringes applicable law, especially the GDPR.

## 9. FURTHER IMPORTANT INFORMATION

9.1. Legal Bases. Data protection laws regulate, that we are only allowed to collect and process your Data, if we have lawful bases for processing. The lawfulness of processing stems from

- your consent in such cases where you have given consent;
- the necessity for the fulfillment of your user contract, e.g. where Data is needed for a satisfactory use of the Product; or
- legitimate interests pursued by Kippy or a third party.

Our legitimate interests include protecting you, Kippy, or others from security threats or fraud, complying with all applicable laws, managing and improving our business (e.g. customer service, reporting) including possible corporate transactions, enabling users to share their and connect via pet experiences, and express all pet related opinions.

The following processing is based on the legitimate interests of Kippy:

- Processing of billing-relevant data to comply with the statutory provision of accounting (for example, determining the tax rate based on the country selected by the customer when activating a GPS tracker).
- Processing demographic data in aggregated form for creating reports that improve the company.
- Processing of e-mail address, delivery address, billing address and IP address to detect potential fraud cases.
- Processing the IP address to detect and prevent potential attacks on the Kippy software system.

9.2. Safety Measures. To avoid unauthorized access to Data and generally secure the Data, we apply the safety measures which comply with the latest technological developments.



9.3. Pictures. By uploading pictures, you confirm that other persons depicted in the pictures consent to the upload of the respective picture.

9.4. Usage of Minors. Users under the age of 18 are not allowed to transmit any personally identifying information to Kippy, without the consent of their legal guardian.

## 10. CHANGES TO THE PRIVACY POLICY

10.1. General. Kippy may change this privacy policy.

10.2. Material Changes. If we make material changes to it, we will provide notice directly in our Products, or by other means, to provide you the opportunity to review the changes before they become effective. Material changes will, for example, include further tracking, profiling, and analytics services. Should your consent be necessary, we will obtain it, before the changes become effective. If you object to any changes, you may close your account. You acknowledge that your continued use of our Products after we publish or send a notice about our changes to this privacy policy means that the collection, use and sharing of your personal data is subject to the updated privacy policy.

10.3. Last Updated. This privacy policy was last modified on 27/11/2018.