

## PRIVACY NOTICE of PATHEARN

"VMobile" AD ("**VMobile**", "**we**") is the data controller of the personal data received from the users ("**user**", "**you**") in connection with (i) browsing the Pathearn web based software platform <https://pathearn.ai> (the "**Platform**"); (ii) registering in the Pathearn mobile software application using Android and iOS operating systems and available for free download in the online stores GooglePlay and Apple Store and on the Platform (the "**Application**") and/or entering the Application as a guest and (iii) using the Application and the Platform.

Pathearn is a software solution for gathering of data for vehicles, IoT devices and multiple moving and stationary objects, for the needs of data consumers in a distribution ecosystem ("**Pathearn**"). Pathearn is being migrated over a blockchain protocol to enhance secure and transparent monetization of the relevant user-generated data..

### WHAT DATA DO WE COLLECT, WHY AND FOR HOW LONG DO WE KEEP IT?

#### 1. Browsing the Platform

When visiting (browsing) the Platform, we do not collect any of your personal data, do not store IP addresses and do not analyze the behavior of visitors. We use only necessary (functional) cookies (like rc::a and rc::c) helping to distinguish between humans and bots.

We have envisaged a contact form where you can share with us some thoughts or ask us any questions. For that we will need your **e-mail** to reach you back. We store this data only for the time we need to be in touch with you and a limited time after that. We do not store any other personal data which you may decide to share with us in your message to us.

#### 2. Registration / Guest visiting

You can register by creating your account in the Application and/or the Platform. For the purposes of registration we only need your **email address** (as a username) and **password** for log-in purposes.

In addition, we may collect your device **IMEI number** for general reporting purposes. The information from the IMEI is usually non-personal, i.e. it does not, on its own, permit direct association with any specific individual, and we may access it only in aggregated form.

The data provided by you can be used by VMobile to contact you (strictly with respect to matters concerning the Application/the Platform), as well as to provide you with up-to-date information.

Through the registration data you can use all functionalities and review your account easily without registering each time, you can review your account profile, accumulate and use points and crypto tokens with the same or different designation that will run natively on the Ethereum blockchain with ERC-20 and will have 18 decimals ("**PTRN**"). PTRNs will be used to facilitate the sale, purchase, and exchange of data and will be exchangeable for points collected by using Pathearn via the Application and/or the Platform.

In order to be able to use the services offered through the Application, you can also log in as a guest. When you log in as a guest you do not create username and password and thus no email address is collected by us. However, when you need to use the gathered points/PTRNs (as explained in the [Terms of Use](#)) you should either use the account of a registered person, or register yourself to Pathearn on the same device and transfer the points/PTRNs to the respective account so that you can exchange them further.

We keep your account data as a registered user for as long as it exists. An account that has not been used at all for 48 months and/or has no accumulated points/PTRNs would be deleted and the data on it not stored by VMobile. .

#### 3. Using the Application and the Platform

When you use the Application/the Platform, you collect points (and cryptocurrency) for each **vehicle registration plate**, together with **GPS coordinates, current time and a cropped photo of the**

**registration plate.** The collection and the nature of processing of such (third party) information is described in detail in the [Terms of Use](#).

In connection with the above – please note that we receive such information automatically from your device. You do not have access to it, i.e. you do not see and do not keep on your device at any time any registration plates, location and time of stay or passage of a vehicle. Consequently, you cannot use this information for your personal purposes or process it in any other way.

Apart from the above, in order to collect points and to send us the above information, **you indirectly share with us your location** (as the GPS coordination of the detected vehicles coincides to a certain extent with your personal location i.e., the location of your device at that time) or the location of the installed by you camera/s.

At the moment, we are neither processing for specific purposes nor using your location data in any way. We do not aim and do not accumulate the information about your location with other data you provide us with. We do not profile you or analyze your movement and/or your daily habits. We do not store your location as a separate type of personal data related to you. However, this information reaches us and in order you to be informed and we to be in compliance with our legal obligations about this part of the processing, we require your consent (through the designated click button on the Application/the Platform), as described in the next paragraph.

The location of the installed by you camera/s is provided by you via the Application and/or the Platform and stored by us with respect to our need to identify the location of the passing vehicles. Your temporary location might become indirectly known to VMobile due to the processing of the location data of your installed camera/s but with a very low probability. In this case, we know only the location point of the placed camera (we detect no movement). This camera location point may have nothing to do with your current location. Again, this information is not processed in any way (including - it is not used to draw conclusions about your place of work and residence, as well as your centers of interest), but in order for us to be sure that you are fully informed about that location data processing, we again require your consent.

#### **4. Storage**

Except as described above, we generally store your personal data for as long as it is necessary for performing the functional service of the Application/the Platform and to comply with our legal obligations. If you no longer want us to use your information that we access and store, you can request that we erase your personal information and close your account. However, some data may still be stored for a certain period of time (but no longer than the storage purpose requires) or if information is necessary to comply with legal obligation or in order to maintain safety and data backup settings, prevent fraud or other malicious acts.

Please note that without the data listed above, the Application/the Platform cannot be used and cannot function.

#### **5. Opt-out of Location Data Processing**

If you don't want third-party service providers to use your location data you can follow the instructions below. However, this will prevent you from using the Application:

- iOS 11 or later: turn Location Services off for the applicable Product via the menu "Settings > Privacy > Location Services". Then select the applicable App and set the "Share My Location" status to "Never". Please see additional information here: [About privacy and Location Services in iOS and iPadOS](#).
- Android 5.0 or later: turn Location off for the applicable Product via the menu "Settings > Apps > [applicable Product] > Permissions > Location". Then turn off the "Location" button.

#### **ON WHAT LEGAL GROUNDS DO WE PROCESS YOUR PERSONAL DATA?**

We need the data processed in connection with your registration for the operation of the Application and the Platform and their use by you. The legal ground for such processing is our **legitimate interest**

to offer you a better and easily accessible service. It is also our **legitimate interest** to stay in touch with you when you reach us via our contact form.

In addition to the above, you are in a **contractual relationship** with us, as you use the Application and/or the Platform based on your agreement with our [Terms of Use](#).

With regard to the ability to process (albeit indirectly) your location and time of stay/pass over and/or the location of the installed by you camera/s, you give your voluntary and informed **consent** to this at the designated places in the Application and the Platform. All requisites for you to provide a lawful consent are contained in this Privacy notice. You have the right to withdraw your consent at any time which will however mean that you will no longer be able to use the Application/the Platform in its designated way (you will be, however, able to use your up to that moment gathered point/PTRNs). The withdrawal of your consent does not affect the lawfulness of processing based on your consent before its withdrawal.

## **ACCESS TO DATA OF THIRD PARTIES-RECIPIENTS**

We do not grant access to or transfer your data to third parties. Exceptionally, it is possible, if it is lawful and in our legitimate interest, to provide your data to our technical, legal, IT or other consultants for a specific case, for a certain time required to carry out the consultation, only if it is necessary and/or in order to protect our legal rights and interests.

We will not rent or sell your personal data to any third parties, but we may (if applicable) share your information from tools like log files, and device identifiers and location data, with third-party organizations that provide automatic data processing technologies for the Application/the Platform. We do not control or influence these third parties' tracking technologies or how they may be used.

With respect to the service providers which we use for the Application (Android or iOS depending on your device) please consult the correspondent websites and privacy policies to learn more about these services and their privacy options (including opt-out). We are not responsible for any usage of your personal data by these providers.

## **DATA TRANSFER**

We do not transfer your personal data outside the EU and / or the European Economic Area. The cloud database of VMobile is located in Bulgaria.

VMobile respects any local legislation restrictions. With this respect the Data of Turkish data subjects is stored in Turkey and the Data accessed from abroad is not disclosed.

For the purposes of data storage, we take your privacy seriously and, therefore, encrypt your personal data.

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### **INFORMATION ABOUT DATA SUBJECTS WHICH DATA WILL BE COLLECTED VIA THE PATHEARN APP**

Based on the use of the Application and the Platform we will process the following information about an indefinite circle of vehicles - **vehicle registration plate**, together with **GPS coordinates, current time and a cropped photo of the registration plate** (the "Data"). Such information may or may not be related to any particular data subjects. If related to data subjects it is yet almost impossible or possible with disproportionate additional efforts and gathering additional information to identify such subjects - something we do not do at any point in the processing of the information we provide.

Notwithstanding the above, we have taken all necessary technical and organizational measures to protect the Data by processing it via encrypted channel and in a pseudonymized and/or anonymized form.

With respect to the implementation of our project to maintain a database with the Data and the benefits to the society we envisage with the large implementation of that project, it is our **legitimate interest** to process the Data in compliance with all applicable data protection rules and regulations.

The storage of the Data depends on the legitimate interest of VMobile to maintain the database. However, deletion on grounds of relevance is made on a period of 5 years (inaccurate or not up to date Data).

With respect to the processing of the Data we have conducted a purposive Data Protection Impact Assessment (the "DPIA") which gives the assurance that the risk for the rights and interests of the data subjects is not high but moderate and acceptable. All residual risks have been taken into consideration and covered with proportional measures. A consolidated version of the DPIA is available for you [here](#).

The access to the Data by any third parties is usually in an aggregate form for statistical purposes or by providing anonymized information. In the rare occasions in which we provide (not raw) Data to third parties in a not anonymized form the Data is usually accumulated with other information about a particular data subjects by such third parties themselves. In such cases the data subjects is informed by the third party about that processing which is done only after his/hers explicit consent or some other legal basis would be obtained or secured.

We do not transfer your personal data outside the EU and / or the European Economic Area. The cloud database of VMobile is located in Bulgaria.

Your rights are as enumerated hereunder. You can contact us on the provided e-mail for any enquiries or need of clarification.

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## INFORMATION SECURITY

We are committed to ensure that the information you provide to us is protected. We have put in place appropriate technical and organizational measures, carried out a data protection impact assessment consolidated version of it to be found [here](#)) and maintained a high level of protection of the data and information that reaches us.

## YOUR RIGHTS

You have the right to require from us information about, copy of, access to or deletion of your personal data, as well as limit the processing that applies to you. You may object to the processing of the data. You have the right to information and comment on the automated processing of your data, in cases where and if we use one, of which you will be duly notified.

If you have not been able to correct your data yourself, you can ask us to correct or remove any information you consider to be inaccurate.

For any of the above requests, please contact us at: [support@vmobile.eu](mailto:support@vmobile.eu).

We may require additional proof of identity to protect your personal information from unauthorized access.

You can file a complaint to the data protection authority in your country. Contact details of the data protection authorities in all Member States can be found here - [https://edpb.europa.eu/about-edpb/about-edpb/members\\_en](https://edpb.europa.eu/about-edpb/about-edpb/members_en). Contact details of the Turkish data protection authority can be found here – <https://www.kvkk.gov.tr>.

## PRIVACY NOTICE UPDATES

This Privacy notice is updated from time to time. Whenever we do this, we post those updates at a visible place at the Application, the Platform and/or other places that we consider appropriate.

**Note:** This Privacy Notice is in compliance with all applicable EU and national data protection legislations of the Member States to which it applies as well as with the applicable Turkish data

protection legislation. The Privacy Notice will be taken as a basis in fulfilling the obligation of the data controller to inform data subjects within the scope of Turkish Law No. 6698.