

At Topo Guru, our mission is to make climbing easier for climbers from all over the world. That mission covers our activities, and extends to our online community as well through our website and application. Our privacy policy describes what Personal Data we collect online and how we use that information.

This privacy policy applies to all use of our websites, [www.topoguru.com](http://www.topoguru.com), (hereinafter “Web”), and all use of our application for mobile devices (hereinafter “App”). The Web and the App together form our service offers to you (hereinafter “Platform”).

### **Information We Collect**

Topo Guru collects information to operate our business and provide you with innovative climbing IT solutions improve existing products and services, develop new products and services, and to improve and personalize your experiences interacting with us. We collect both Personal Data and Other Information in support of these efforts.

- Personal Data is information that can be used, directly or indirectly, alone or together with other information, to identify you as an individual User. When you register with us, we collect registration and demographic details (.e.g., name, username and password, email address, date of birth, and location). This includes your precise GPS Location Data.
- Other Information is information that is anonymous, de-identified, or otherwise does not reveal your identity. Some examples include age, gender, browser and operating system, time spent using our services, your device type, transactions carried out between you and Topo Guru, purchases of our goods or services and webpages visited. When you connect with us through social media, we may collect account or profile information. For example, when you log in with your Facebook credentials, with your consent we may collect Personal Data from your Facebook profile that is permitted under Facebook’s Terms of Use, such as your email address, profile picture, and friend list. For more information, please review the privacy disclosures and terms of your Facebook account.
- Location Data: We may collect precise location data as part of the functionality of our Services. For example, if you want to navigate yourself to a boulder with Topo Guru application and you have enabled geolocation tracking, we will collect your Location Data to show you the direction and distance of the boulder. We collect Location Data from the device on which you use our Services and your wireless carrier. If you decline to allow Location Data collection in the app, we will not collect your Location Data unless you manually enter it in.

### **What do we use your information for?**

Any of the information we collect from you may be used in one of the following ways:

- To personalize your experience – (your information helps us to better respond to your individual needs)
- To improve our website – (we continually strive to improve our website offerings based on the information and feedback we receive from you)
- To improve customer service – (your information helps us to more effectively respond to your customer service requests and support needs)
- To process transactions
- To administer a contest, promotion, survey or other site feature
- To send periodic emails
- The email address you provide for order processing, may be used to send you information and updates

pertaining to your order, in addition to receiving occasional company news, updates, related product or service information, etc. Note: If at any time you would like to unsubscribe from

receiving future emails, we include detailed unsubscribe instructions at the bottom of each email. Your information, whether public or private, will not be sold, exchanged, transferred, or given to any other company for any reason whatsoever, without your consent, other than for the express purpose of delivering the purchased product or service requested.

We mainly collect the personal data that you submit to us, including your contact information, comments, climbing log and purchase history. But we also collect information in several ways from different parts of the Platform, including but not limited to the way you use the Platform and if applied tracking information about your whereabouts on the Internet and technical information about your devices and location.

When registering via our online Platform, you provide us with certain information, including email, password, username, name, country of origin, preferred language. When registering and signing in via third-party application login (such as Facebook), and you authorize us to access certain account information from that third-party application, such as basic profile information; name, profile picture, e-mail address (optional), current city (optional). Some of this information will never be made public, such as password. Other information can be either hidden by default (email address, country of origin) or public by default (name and profile picture if third party application sign up). Please note that your username will be public at all times.

#### **EEA-users**

If you are a resident of the European Economic Area, you have the following data protection rights based on GDPR, which you can exercise at any time by contacting us using the contact details provided under this section.

- The right to access, correct, update or request deletion of your Personal Data.
- The right to object to processing of your personal information when it is based on our legitimate interests, and separately the right to object to direct marketing.
- The right to ask us, in some situations, to restrict processing of your personal information or request portability of your personal information.
- The right to opt-out of marketing communications we send you at any time.
- If we have collected and process your personal information with your consent, then you have the right to withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent. **You can at any time withdraw your consent by deleting your profile account in the in-app settings.**
- The right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority.
- We store the following personal data information: your name, nickname, location, purchasing history, facebook id (if registered with facebook-user), email address.
- We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

If you are aware of changes or inaccuracies in your information, you should inform us of such changes so that our records may be updated or corrected.

When we receive a request to access, rectify, erase or port data, we may ask you for additional information in order to confirm your identity and ensure data security. You can send a request at [info@topoguru.com](mailto:info@topoguru.com).

If you have any questions regarding this Privacy Policy or if you wish to access or correct your Personal Data, you may send your request to [info@topoguru.com](mailto:info@topoguru.com).

### **Communication**

We respect your communication preferences and have created several ways for you to control how Topo Guru communicates with you: **Email Communication:** You may stop receiving promotional email messages from us by following the unsubscribe instructions provided in any such message you receive. Please note that if you unsubscribe from “all emails” this means “all promotional emails” and you still will receive email communications from us that are not promotional in nature (for example safety instructions). **Push Notifications:** With your permission, Topo Guru may use push notifications to let you know about new messages or events even when you are not actively using a Service. You can manage the type of push notifications you receive from Topo Guru by modifying the settings in your phone menu.

### **Manage your geolocation services**

Disabling location services will not allow us to collect your Location Data when you use our Services and may impact the operation of a Service, for example it will not be possible to show you the distance from a boulder.

### **Children**

We are in compliance with the requirements of COPPA (Childrens Online Privacy Protection Act), we do not collect any information from anyone under 13 years of age. Our website, products and services are all directed to people who are at least 13 years old or older.

### **Third Parties We Don't Own or Control**

Occasionally, at our discretion, we may include or offer third party products or services on our website. These third party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our site and welcome any feedback about these sites.

### **Cookies**

A cookie is a small text file stored on your computer, tablet, mobile or similar, for the purpose of recognizing your device if you visit our website again (such as login, language, font size and other settings). This makes it possible to customize the Website to your browser. A cookie may contain text, numbers or e.g. a date, but generally there are no personal data in a cookie. It is not a program and thus cannot contain a virus.

When you visit our website, we collect information about you that allows us to identify your device. The information is used to customize and improve our content on the website and to get statistical information (not personal information), so we can provide you with the best possible experience. If you choose not to accept cookies at all you may not be able to use all the functions of our website.

You can modify your browser, so cookies are not stored on your computer, tablet, mobile etc. Be aware, however, that without cookies, you may not be able to use all the functions of our website.

Besides our own cookies, we use cookies from third parties, e.g. from suppliers of advertisements and analytic tools and from suppliers of social media.

### **How to Contact Us**

If you have any questions, comments, or concerns about how we handle your Personal Data, then you may contact us through our website: [www.topoguru.com](http://www.topoguru.com) or in email: [info@topoguru.com](mailto:info@topoguru.com)

### **Privacy Policy Updates**

If we decide to change our privacy policy, we will post those changes on this page, and/or update the Privacy Policy modification date.