

## Website Privacy Notice

Capitalized terms used in this Privacy Notice (the "**Notice**") but not defined in this Notice shall have the respective meanings ascribed to such terms respectively in the General Terms and Conditions for the provision of services, Terms of Service governing use by the Petwalker/Petsitter of the service made available by Mopets and User terms of service.

### 1. About this Notice

- 1.1 This Notice explains how we (as defined below) collect, share and use any information that, alone or in combination with other information, directly or indirectly identifies or relates to you ("**Personal Data**") when you ("**you**" and "**your**") use our online platform available on our website <http://www.mopets.com> ("**Website**").
- 1.2 This Notice also sets out the rights that you have in relation to the Personal Data that we process about you and how you can exercise them.
- 1.3 Mopets treats compliance with its privacy obligations seriously. This is why we have developed this Notice, which describes the standards that Mopets applies to protect your Personal Data. Please note however that we cannot control over how other Users may use your Personal Data if you choose to disclose any Personal Data to them. We will not accept any liability in this respect and we recommend you to be careful when disclosing any Personal Data to other Users.
- 1.4 For the purposes of this Notice, Mopets SPRL with registered office at Bovenberg 124, 1150 Brussels, and registered with the Crossroads Bank of Enterprises (RPM Brussels) under number 0689.619.916 and with VAT BE0689.619.916 ("**Mopets**", "**us**", "**we**", or "**our**") acts as the data controller for the Personal Data that is collected via the Website. As a data controller, Mopets is responsible for ensuring that the processing of Personal Data complies with applicable data protection law, and specifically with the General Data Protection Regulation.
- 1.5 Please take the time to read this Notice carefully. If you have any questions or comments, please contact [privacy@mopets.com](mailto:privacy@mopets.com)

### 2. When do we collect Personal Data?

- 2.1 In general, we collect your Personal Data when you register an account on our Website as an User, Professional or Petwalker/Petsitter ("**Account**") and use any of the features made available on our Website. Our Website is primarily intended to allow Users to:
  - Access a social network dedicated to the animal world in order to enable the User to enter into contact with other Users to share information about his or her Pet(s);
  - Enter into contact with Petwalkers and Petsitters that offer Petwalking/Petsitting Services and possibly other services;
  - Access and, if you are a Professional, possibly be included in the Professional Directory.

2.2 When registering an Account, we will invite you to provide us with certain Personal Data. At the time of registration, we will expressly indicate if you are obliged to provide certain Personal Data in order to gain access to certain services available on the Website. Please note that if you do not wish to provide us with such compulsory Personal Data, you will not be able to use the services provided on our Website. Other Personal Data that are not compulsory can be provided by you voluntarily and are optional. If you do not wish to communicate such optional Personal Data, this will not affect your possibility to use the services of our Website.

2.3 If you are a Professional, we may have collected certain basic Personal Data automatically from publicly accessible sources to make a free space in the Professional Directory. You can choose to sign up for a Premium Subscription and complete your space in the Professional Directory with further Personal Data in accordance with our User Terms of Service.

**3. What Personal Data does Mopets collect and why?**

3.1 The types of Personal Data that we may collect about you, and the reasons why we process it, include:

Categories of data subjects	Why we collect it	Types of Personal Data	Legal basis
Users Petwalker/Petsitter	<ul style="list-style-type: none"> <li>• Administer our Website and provide you with the services available on the Platform;</li> <li>• Providing you information about our or our Business Partners' products or services;</li> <li>• Management and operation of a commercial Platform that puts Users of the Website in contact with each other.</li> </ul>	<ul style="list-style-type: none"> <li>• First name;</li> <li>• Last name;</li> <li>• E-mail address;</li> <li>• City location;</li> <li>• Contact details;</li> <li>• Information related to your Pet (such as its name);</li> <li>• Content you have posted on the Website on your Petwalker/Petsitter Profile; (including pictures, ratings you have received from Users);</li> <li>• Content you have posted on the Website under your Account (including pictures, comments, ratings, feedback provided by you, correspondence through the Website to other Users or</li> </ul>	<ul style="list-style-type: none"> <li>• Contractual necessity or taking steps at your request prior to entering a contract;</li> <li>• Our legitimate interest to get to know your preferences to enable us to better personalise our offers / advertising;</li> <li>• Compliance with a legal obligation;</li> <li>• Your consent, for Personal Data which are optional.</li> </ul>

		Professionals and other materials); <ul style="list-style-type: none"> <li>• National registry number;</li> <li>• Search and user history on the Website under your Account;</li> <li>• Financial information (billing, credit card number and other payment information);</li> <li>• Information provided through your Facebook or Google+ account (name, account name, profile picture, gender, age, nationality, user name, information about your connections or any other Personal Data that you have made available on Facebook or Google+);</li> <li>• Information provided by other Users of our Website in communication with us relating to a question or complaint.</li> </ul>	
	<ul style="list-style-type: none"> <li>• Contacting you on your request about an inquiry you have submitted.</li> </ul>	<ul style="list-style-type: none"> <li>• E-mail address.</li> </ul>	<ul style="list-style-type: none"> <li>• Your consent.</li> </ul>

Professionals	<ul style="list-style-type: none"> <li>• Providing you information about our products or services;</li> <li>• Administer our Website;</li> <li>• Management and operation of a commercial Platform that puts Users in contact with each other.</li> </ul>	<ul style="list-style-type: none"> <li>• Full name;</li> <li>• Contact details (e-mail address, telephone number, address);</li> <li>• Pictures;</li> <li>• Content you have posted on the Website under your Account;</li> <li>• Financial information (bank account number);</li> <li>• VAT number;</li> <li>• Ratings and/or comments provided by Users.</li> </ul>	<ul style="list-style-type: none"> <li>• Contractual necessity or taking steps at your request prior to entering a contract;</li> <li>• Our legitimate interest to provide the Professional Directory to our Users;</li> <li>• Your consent, for Personal Data which are optional.</li> </ul>
	<ul style="list-style-type: none"> <li>• Contacting you on your request about an inquiry you have submitted.</li> </ul>	<ul style="list-style-type: none"> <li>• E-mail address.</li> </ul>	<ul style="list-style-type: none"> <li>• Your consent.</li> </ul>

3.2 If you are using our Website as Petwalker/Petsitter by offering Petwalking/Petsitting Services, we are legally obliged, under the Royal Decree of 12 January 2017 concerning the conditions for obtaining accreditation as electronic platforms of sharing economy (the "**Royal Decree**") to collect your national registry number and to use it for the purposes as set forth in article 4 of the Royal Decree.

3.3 As an User, you can link your Account to your family page ("**Family Page**"). We offer Users the possibility to transfer an Account from their Family Page to the Family Page of the new owner of their Pet. All information relating to the Pet will automatically be transferred to the Family Page of the new Pet owner. However, pictures that were posted on your Account will only be transferred to the Family Page of the new Pet owner with your explicit consent and by default any content posted on your Account will also remain with your Family Page.

3.4 We may also collect certain information automatically from your device. Specifically, the information we collect automatically may include information like your IP address, device type, unique device identification numbers, browser-type, broad geographic location (e.g. country or city-level location) and other technical information. We may also collect information about how your device has interacted with our Website, including the pages accessed and links clicked.

Collecting this information enables us to better understand the visitors who come to our Website, where they come from, and what content on our Website is of interest to them. We use this information for our internal analytics purposes and to improve the quality and relevance of our Website to our visitors.

Some of this information may be collected using cookies and similar tracking technology, as explained further in our Cookie Notice.

In general, we will use the Personal Data we collect from you only for the purposes described in this Notice or for purposes that we explain to you at the time we collect your Personal Data. However, we may also use your Personal Data for other purposes that are not incompatible with the purposes we have disclosed to you (such as archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes) if and where this is permitted by applicable data protection laws.

#### **4. Who does Mopets share your Personal Data with?**

4.1 We may disclose your Personal Data to the following categories of recipients:

- (a) to **our group companies** for purposes consistent with this Notice. We take precautions to allow access to Personal Data only to those staff members who have a legitimate business need for access and with a contractual prohibition of using the Personal Data for any other purpose;
- (b) to **other Users** to allow them to contact you on the Platform;
- (c) to **our third party vendors, services providers and partners** who provide data processing services to us, or who otherwise process Personal Data for purposes that are described in this Notice or notified to you when we collect your Personal Data. This may include disclosures to third party vendors and other service providers we use in connection with the services they provide to us, including to support us in areas such as IT platform management or support services, infrastructure and application services, marketing, data analytics;
- (d) to our **business partners** who promote their services or products on our Website ("**Business Partners**"). We cannot be held liable for the use of your Personal Data by such Business Partners, which will be governed by the privacy policies of such Business Partners. Please carefully read these privacy policies and contact our Business Partner if you have any question with regard to such processing of your Personal Data;
- (e) to **any competent law enforcement body, regulatory, government agency, court or other third party** where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;
- (f) to **our auditors, advisors, legal representatives and similar agents** in connection with the advisory services they provide to us for legitimate business purposes and under contractual prohibition of using the Personal Data for any other purpose;
- (g) to a **potential buyer** (and its agents and advisers) in connection with any proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your Personal Data only for the purposes disclosed in this Notice;
- (h) to any other person, if you have provided your prior consent to the disclosure.

## 5. How we protect your privacy

5.1 We will process Personal Data in accordance with this Notice, as follows:

- (a) **Fairness:** We will process Personal Data fairly. This means that we are transparent about how we process Personal Data and that we will process it in accordance with applicable law.
- (b) **Purpose limitation:** We will process Personal Data for specified and lawful purposes, and will not process it in a manner that is incompatible with those purposes.
- (c) **Proportionality:** We will process Personal Data in a way that is proportionate to the purposes which the processing is intended to achieve.
- (d) **Data accuracy:** We take appropriate measures to ensure that the Personal Data that we hold about you is accurate, complete and, where necessary, kept up to date. However, it is also your responsibility to ensure that your Personal Data is kept as accurate, complete and current as possible by informing us promptly of any changes or errors.
- (e) **Data security:** We use appropriate technical and organisational measures to protect the Personal Data that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your Personal Data. Specific measures we use include separating Personal Data and Platform information in separated secured and encrypted cloud databases.
- (f) **Data processors:** We may engage third parties to process Personal Data for and on behalf of Mopets. We require such data processors to process Personal Data and act strictly on our instructions and to take appropriate steps to ensure that Personal Data remains protected.
- (g) **International data transfers:** Your Personal Data may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of your country (and, in some cases, may not be as protective).

Specifically, our servers are in Germany (Frankfurt), and our group companies and third party service providers and partners operate around the world. This means that when we collect your Personal Data we may process it in any of these countries. However, we have taken appropriate safeguards to require that your Personal Data will remain protected in accordance with this Notice. We can provide you with more information in this respect upon request.

- (h) **Data Retention:** We retain Personal Data we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

When we have no ongoing legitimate business need to process your Personal Data, we will either delete or anonymise it or, if this is not possible (for example, because your Personal Data has been stored in backup archives), then we will securely store your Personal Data and isolate it from any further processing until deletion is possible.

## 6. Your data protection rights

6.1 You have the following data protection rights:

- (a) If you wish to **access, correct, update or request deletion** of their Personal Data, can do so at any time by updating your Account or deleting their Account as explained in the Mopets User Terms of Service available on [\[hyperlink\]](#). Please note that you cannot remove any ratings that you have received from other Users on the Website.
- (b) In addition, in certain circumstances, as stipulated in the applicable data protection legislation, you can **object to processing** of your Personal Data, ask us to **restrict processing** of your Personal Data or **request portability** of your Personal Data. You can exercise these rights by contacting us using the following contact details: [privacy@mopets.com](mailto:privacy@mopets.com).
- (c) If we have collected and process your Personal Data with your consent, then you can **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 Data conducted in reliance on lawful processing grounds other than consent. If you no longer want to have your Personal Data shared with our Business Partners, you can let us know by contacting us using the following contact details: [privacy@mopets.com](mailto:privacy@mopets.com).
- (d) You have the **right to opt-out of marketing communications** we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you.
- (e) If you have a complaint or concern about how we are processing your Personal Data then we will endeavour to address such concern(s). If you feel we have not sufficiently addressed your complaint or concern, you have the **right to complain to a data protection authority** about our collection and use of your Personal Data. For more information, please contact your local data protection authority.

6.2 We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

## 7. Linking to other websites

7.1 The Website may contain hyperlinks to websites owned and operated by third parties. These websites have their own privacy policies and we urge you to review them. They will govern the use of Personal Data you submit whilst visiting these websites.

We do not accept any responsibility or liability for the privacy practices of such third party websites and your use of such websites is at your own risk.

## 8. Updates to this Notice

8.1 We may update this Notice from time to time in response to changing legal, technical or business developments. When we update our Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Notice changes if and where this is required by applicable data protection laws.

**Commenté [ 1 ]:** **Fieldfisher comment:** Please complete a hyperlink to the User Terms of Service.