

PRIVACY POLICY

PRO ALERTS

This Privacy Policy shall be effective starting on September 3th, 2018.

Last updated: June 3th, 2019

The owner and data controller of the Pro Alerts mobile app is Joeri W. Bultheel - "dataexcess" and its future legal successors and assigns. Contact the owner by using the email address: contact@dataexcess.xyz

The owner and data controller of the Pro Alerts mobile app (referred to hereinafter as "PA", "we", "us") respects and protects the privacy of its users and the customers who use its services. To ensure transparency, this Privacy Policy describes our information handling practices when you use the Pro Alerts mobile app (the "App") and related services (referred to collectively hereinafter as "Services").

Please take a moment to read this Privacy Policy carefully. If you have any questions about this Privacy Notice, please contact us at contact@dataexcess.xyz

ACCEPTANCE OF PRIVACY POLICY

By accessing and using our Services, you signify acceptance to the terms of this Privacy Policy. In case we require your consent to process your personal information, we will ask for your consent to the collection, use, and disclosure of your personal information as described further below. PA may provide additional "just-in-time" disclosures or additional information about the data collection, use and sharing practices of specific Services. These notices may supplement or clarify PA's privacy practices or may provide you with additional choices about how PA processes your data.

If you do not agree with or you are not comfortable with any aspect of this Privacy Policy, you should immediately discontinue access or use of our Services.

CHANGES TO THIS PRIVACY POLICY

We reserve the right to modify this Privacy Policy at any time, and when required by law, we will notify you of changes to this Privacy Policy. If we make any material changes we will notify you by push notification (sent to the push notification device token specified in your account) prior to the change becoming effective.

THE PERSONAL INFORMATION WE COLLECT

We collect information to provide you with our Services. When we require certain information from users it is because we are required by law to collect this information or it is relevant for specified purposes. You are free to choose whether to provide us with the information requested, but we may not be able to offer you our Services when you do choose not to share certain information with us.

Personal information is data that can be used to identify you directly or indirectly, or to contact you. Our Privacy Policy covers all personal information that you voluntarily submit to us and that we obtain from third parties. This Privacy Policy does not apply to anonymised data, as it cannot be used to identify you.

Currently, we do not collect any data that would constitute your personal information, but we may decide to collect it in the future and will correspondingly update this Privacy Policy. For example, we could be processing your personal data to provide customer support, process refunds or ask you what new features you would like to see coming to the App in the future.

We currently collect the following types of information:

Usage Data: an anonymously generated user ID, information on alerts created by the User, information on the value and amount of (crypto-)currencies in the user's Coinbase Pro wallet, the total value of the user's Coinbase Pro wallet and the user's trading data made on the Coinbase Pro platform.

None of this information can be used to personally identify you.

With respect to all other data that you provide inside the app, such as your Coinbase Pro API key, Coinbase Pro secret, and Coinbase Pro passphrase we adopt a *privacy by design* approach. This means that your data is stored exclusively locally on your iOS device (smartphone) and encrypted using the Advanced Encryption Standard encryption technique. The encryption process uses a unique randomly generated password stored on device by using Apple's Keychain Services API. We have no technical possibility to access before-mentioned data.

Information about the purchases you make on our Services, such as the purchase ID, date and the amount of purchase, are collected by Apple, which we can however access via our App Store account. This information is not personally identifiable and does not constitute personal data. In particular, your AppleID is not shared with us.

You may be asked to provide personal information in the future, anytime you are in contact with PA, for example when we will be providing support to you. PA may use it consistent with this Privacy Policy and combine it with other information to provide and improve our products and services.

PA will not give, sell, rent or loan any personal Information to any third party.

INFORMATION FROM THIRD PARTY SOURCES AND INFORMATION SHARING

We regularly obtain information about you from third party sources such as the Coinbase Pro API to generate the alerts you set up.

We do not collect any other data automatically and we do not use cookies.

We do collect and share the following data with the Firebase Crashlytics Service to facilitate infrastructural monitoring and crash reporting: Geographic position and various types of Data as specified by the privacy policy of the service.

HOW WE PROTECT AND STORE PERSONAL INFORMATION

We understand how important your privacy is, which is why PA maintains (and requires its service providers to maintain) appropriate physical, technical and administrative safeguards to protect the security and confidentiality of the personal information you entrust to us.

We may store and process all or part of your personal and transactional information, in Germany and elsewhere in the world where our service providers (for example, hosting providers) are located. We protect your personal information by maintaining physical, electronic, and procedural safeguards in compliance with the applicable laws and regulations.

For example, we use computer safeguards such as firewalls and data encryption, we enforce physical access controls to our buildings and files, and we authorise access to information only for those employees who require it to fulfil their job responsibilities. We use reputed service providers such as Firebase to host our database.

However, we cannot guarantee that loss, misuse, unauthorised acquisition, or alteration of your data will not occur. Please recognise that you play a vital role in protecting your own personal information. When registering with our Services or the service we use such as Coinbase Pro, it is, when applicable, important to choose a password of sufficient length and complexity and to not reveal this password to any third-parties.

Furthermore, we cannot ensure or warrant the security or confidentiality of information you transmit to us or receive from us by Internet or wireless connection, including email, phone, or SMS, since we have no way of protecting that information once it leaves and until it reaches us.

RETENTION OF INFORMATION

We store your information securely throughout the life of your App account. We will only retain your personal information for

as long as necessary to fulfil the purposes for which we collected it.

HOW TO CONTACT US AND COMPLAINTS

If you have questions or concerns regarding this Privacy Policy, or if you have a complaint, you should contact us at contact@dataexcess.xyz.