

# Privacy Policy of **BluMobile**

This Application collects some Personal Data from its Users.

## **POLICY SUMMARY**

### **Personal Data collected for the following purposes and using the following services:**

- **Device permissions for Personal Data access**
  - **Device permissions for Personal Data access**  
Personal Data: Approximate location permission (continuous), Camera permission and Precise location permission (continuous), Storage permission, Username permission, Password permission,
  - **Location-based interactions**
  - **Geolocation**  
Personal Data: geographic position
- ### **Further information about Personal Data**
- **Push notifications**
  - This Application may send push notifications to the User.

## **FULL POLICY**

### **About BluMobile**

Blulog Sp. z o.o. built the BluMobile Application („Application”) as a Commercial Application. This Service is provided by Blulog Sp. z o.o. and is intended for use as is.

bluMobile applications present temperature and humidity data from different loggers on one screen, in real time and on a chosen Android device. The software can also be used for configuration of the new Bluetooth/Wifi hub

The Application obtains the information User provide when he download and register the Application. Registration with Blulog Sp. z o.o. is optional. However, please keep in mind that User may not be able to use some of the features offered by the Application unless he register with Blulog Sp. z o.o..

### **Blulog Sp. z o.o. and Data Controller**

#### **Types of Data collected**

Among the types of Personal Data that this Application collects, by itself or through third parties, there are: geographic position, Camera permission, Storage permission, Precise location permission (continuous), Precise location permission (non-continuous), Approximate location permission (continuous) and Approximate location permission (non-continuous). Username permission, Password permission, Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using this Application.

Unless specified otherwise, all Data requested by this Application is mandatory and failure to provide this Data may make it impossible for this Application to provide its services. In cases where this Application specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Blulog Sp. z o.o..

Any use of Cookies – or of other tracking tools – by this Application or by the Blulog Sp. z o.o. of third-party services used by this Application serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy, if available.

Users are responsible for any third-party Personal Data obtained, published or shared through this Application and confirm that they have the third party's consent to provide the Data to the Blulog Sp. z o.o.

## **Definitions and legal references**

### **Personal Data (or Data)**

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

### **Usage Data**

Information collected automatically through this Application (or third-party services employed in this Application), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Application, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

### **User**

The individual using this Application who, unless otherwise specified, coincides with the Data Subject.

### **Data Subject**

The natural person to whom the Personal Data refers.

### **Data Processor (or Data Supervisor)**

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

### **Data Controller (Blulog Sp. z o.o.)**

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of this Application. The Data Controller, unless otherwise specified, is the Owner of this Application.

### **This Application**

The means by which the Personal Data of the User is collected and processed.

### **Service**

The service provided by this Application as described in the relative terms (if available) and on this site/application.  
*European Union (or EU)*

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

## **Mode and place of processing the Data**

### **Methods of processing**

The Blulog Sp. z o.o. takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Blulog Sp. z o.o., in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of this Application (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail

carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Blulog Sp. z o.o.. The updated list of these parties may be requested from the Blulog Sp. z o.o. at any time.

### **Security**

Blulog Sp. z o.o. value User trust in providing Personal Data, thus Blulog Sp. z o.o. are striving to use commercially acceptable means of protecting it. But User should remember that no method of transmission over the internet, or method of electronic storage is 100% secure and reliable, and Blulog Sp. z o.o. cannot guarantee its absolute security.

### **Children's Privacy**

These Services do not address anyone under the age of 13. Blulog Sp. z o.o. do not knowingly collect personally identifiable information from children under 13. In the case that Blulog Sp. z o.o. discover that a child under 13 has provided Personal Data, Blulog Sp. z o.o. immediately delete this from Blulog Sp. z o.o. servers. If User is a parent or guardian and is aware that his child has provided Personal Data, please contact Blulog Sp. z o.o. so that Blulog Sp. z o.o. will be able to do necessary actions.

### **Legal basis of processing**

The Blulog Sp. z o.o. may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes. Note: Under some legislations the Blulog Sp. z o.o. may be allowed to process Personal Data until the User objects to such processing (“opt-out”), without having to rely on consent or any other of the following legal bases. This, however, does not apply, whenever the processing of Personal Data is subject to European data protection law;
- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Blulog Sp. z o.o. is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Blulog Sp. z o.o.;
- processing is necessary for the purposes of the legitimate interests pursued by the Blulog Sp. z o.o. or by a third party.

In any case, the Blulog Sp. z o.o. will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

### **Place**

The Data is processed at the Blulog Sp. z o.o.'s operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

Users are also entitled to learn about the legal basis of Data transfers to a country outside the European Union or to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Blulog Sp. z o.o. to safeguard their Data.

If any such transfer takes place, Users can find out more by checking the relevant sections of this document or inquire with the Blulog Sp. z o.o. using the information provided in the contact section.

### **Retention time**

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for. Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Blulog Sp. z o.o. and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Blulog Sp. z o.o.'s legitimate interests shall be retained as long as needed to fulfil such purposes. Users may find specific information regarding the legitimate interests pursued by the Blulog Sp. z o.o. within the relevant sections of this document or by contacting the Blulog Sp. z o.o..

The Blulog Sp. z o.o. may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Blulog Sp. z o.o. may be obliged to retain Personal Data for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right to access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

## **The purposes of processing**

The Data concerning the User is collected to allow the Blulog Sp. z o.o. to provide its Services, as well as for the following purposes: Location-based interactions and Device permissions for Personal Data access.

Users can find further detailed information about such purposes of processing and about the specific Personal Data used for each purpose in the respective sections of this document.

## **Device permissions for Personal Data access**

Depending on the User's specific device, this Application may request certain permissions that allow it to access the User's device Data as described below.

By default, these permissions must be granted by the User before the respective information can be accessed. Once the permission has been given, it can be revoked by the User at any time. In order to revoke these permissions, Users may refer to the device settings or contact the Blulog Sp. z o.o. for support at the contact details provided in the present document.

The exact procedure for controlling app permissions may be dependent on the User's device and software.

Please note that the revoking of such permissions might impact the proper functioning of this Application.

If User grants any of the permissions listed below, the respective Personal Data may be processed (i.e accessed to, modified or removed) by this Application.

### **Approximate location permission (continuous)**

Used for accessing the User's approximate device location. This Application may collect, use, and share User location Data in order to provide location-based services.

### **Precise location permission (continuous)**

Used for accessing the User's precise device location. This Application may collect, use, and share User location Data in order to provide location-based services.

### **Camera permission**

Used for accessing the camera or capturing images and video from the device.

### **Storage permission**

Used for accessing shared external storage, including the reading and adding of any items.

## Detailed information on the processing of Personal Data

Personal Data is collected for the following purposes and using the following services:

- **Device permissions for Personal Data access**
  - When User visit the mobile Application, he may be asked to use Camera to scan barcodes or QR codes. Camera may be used only for this purpose. No photos will be captured or archived. Only barcodes and QR codes will be captured and archived in order to use some of the features offered by the Application. Blulog Sp. z o.o. will not share them with other users or partners.
  - When User visit the mobile Application, he will be asked to provide his username and password. This information is necessary for proper operation of the application. Thanks to this information the user gets access to measurements and data from loggers and hubs assigned to his account in the BluConsole system.
- **Location-based interactions**
  - When User visit the mobile Application, Application may use GPS technology (or other similar technology) to determine User current location in order to determine the location of the tag. Blulog Sp. z o.o. will not share User current location with other users or partners.

## Further information about Personal Data

- **Push notifications**
  - Push notifications are used to notify the user about exceeding the measurement thresholds from the loggers assigned to his account, as well as providing alerts related to the disconnection of hubs and loggers. The application does not use push notifications for advertising, marketing or monetization purposes.
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## The rights of Users

Users may exercise certain rights regarding their Data processed by the Blulog Sp. z o.o.

In particular, Users have the right to do the following:

- **Withdraw their consent at any time.** Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- **Object to processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent. Further details are provided in the dedicated section below.
- **Access their Data.** Users have the right to learn if Data is being processed by the Blulog Sp. z o.o., obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- **Verify and seek rectification.** Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- **Restrict the processing of their Data.** Users have the right, under certain circumstances, to restrict the processing of their Data. In this case, the Blulog Sp. z o.o. will not process their Data for any purpose other than storing it.
- **Have their Personal Data deleted or otherwise removed.** Users have the right, under certain circumstances, to obtain the erasure of their Data from the Blulog Sp. z o.o..
- **Receive their Data and have it transferred to another controller.** Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance. This provision is applicable provided that the Data is processed by automated means and that the processing is based on the User's consent, on a contract which the User is part of or on pre-contractual obligations thereof.
- **Lodge a complaint.** Users have the right to bring a claim before their competent data protection authority.

### **Details about the right to object to processing**

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Blulog Sp. z o.o. or for the purposes of the legitimate interests pursued by the Blulog Sp. z o.o., Users may object to such processing by providing a ground related to their particular situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time without providing any justification. To learn, whether the Blulog Sp. z o.o. is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

### **How to exercise these rights**

Any requests to exercise User rights can be directed to the Blulog Sp. z o.o. through the contact details provided in this document. These requests can be exercised free of charge and will be addressed by the Blulog Sp. z o.o. as early as possible and always within one month.

## **Additional information about Data collection and processing**

### **Legal action**

The User's Personal Data may be used for legal purposes by the Blulog Sp. z o.o. in Court or in the stages leading to possible legal action arising from improper use of this Application or the related Services.

The User declares to be aware that the Blulog Sp. z o.o. may be required to reveal personal data upon request of public authorities.

### **Additional information about User's Personal Data**

In addition to the information contained in this privacy policy, this Application may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

### **System logs and maintenance**

For operation and maintenance purposes, this Application and any third-party services may collect files that record interaction with this Application (System logs) use other Personal Data (such as the IP Address) for this purpose.

### **Information not contained in this policy**

More details concerning the collection or processing of Personal Data may be requested from the Blulog Sp. z o.o. at any time. Please see the contact information at the beginning of this document.

### **How “Do Not Track” requests are handled**

This Application does not support “Do Not Track” requests.

To determine whether any of the third-party services it uses honour the “Do Not Track” requests, please read their privacy policies.

### **Changes to this privacy policy**

The Blulog Sp. z o.o. reserves the right to make changes to this privacy policy at any time by giving notice to its Users on this page and possibly within this Application and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Blulog Sp. z o.o.. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User's consent, the Blulog Sp. z o.o. shall collect new consent from the User, where required.

## **Contact Details**

In case of User have any questions regarding privacy while using the Application, or have questions about Blulog Sp. z o.o. practices, please contact Blulog Sp. z o.o. via email at [info@blulog.eu](mailto:info@blulog.eu)