



## PRIVACY POLICY

This privacy policy has been compiled to better serve those who are concerned with how their 'Personally identifiable information' (PII) is being used online. PII, as used in US privacy law and information security, is information that can be used on its own or with other information to identify, contact, or locate a single person, or to identify an individual in context. Please read our privacy policy carefully to get a clear understanding of how we collect, use, protect or otherwise handle your Personally Identifiable Information in accordance with our website.

### EU General Data Protection Regulation

As you may know, the European Union will begin enforcing new data protection legislation this month called the General Data Protection Regulation (GDPR). We have updated our Privacy Policy in accordance with GDPR, effective May 25th, 2018. Continued use of SneakerTracker after May 25th, 2018 means accepting our updated Terms of Service.

## COLLECTING DATA

### What personal information do we collect from the people that visit our website or app?

When registering on our site, as appropriate, you may be asked to enter your name, email address, location, product wearing related information, social profiles or other details to help us provide you with a better user experience.

### When and from where do we collect information?

*ONLINE:* We collect information from you when you register on our site, make a purchase, subscribe to our newsletter or enter information directly on our site and/or your respective profile.

*OFFLINE:* We collect information from you with sneaker cards during events and special occasions worldwide. The information provided on the Sneaker Cards is used for contact purposes, and serves as a pre-registration opportunity for the upcoming smartphone application.

### How do we use your information and the collected data?

We may use the information we collect from you when you register, make a purchase, sign up for our newsletter, respond to a survey or marketing communication, surf the website, or use certain other site features in the following ways:

- To personalize user's experience and to allow us to deliver the type of content and product offerings in which you are most interested.
- To improve our website in order to better serve your expectations.

### **How do we protect visitor information?**

Our website is scanned on a regular basis for security holes and known vulnerabilities in order to make your visit to our site is as safe as possible.

### **Do we use 'cookies'?**

We do not use cookies for tracking purposes. You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser (like Internet Explorer) settings. Each browser is a little different, so look at your browser's Help menu to learn the correct way to modify your cookies. If you disable cookies off, some features will be disabled that make your site experience more efficient and some of our services may not function properly.

## **ACCESSING YOUR DATA**

### **How does SneakerTracker store my personal information and how can I have access to it?**

Your personal information is stored in a database. You can request access to all your personal information you have provided with the use of SneakerTracker via email. We will review the claim and provide the requested data within 30 calendar days.

### **How can I request modification or deletion of my personal information?**

You can request modification of your personal information any time by contacting us in email and stating the kind of request. We will review the claim and act accordingly within 30 calendar days.

### **How can I request deletion of my profile and personal information?**

Once you request to delete your profile via contacting us, we will remove all your personal information from our database, including demographic and product-related data, e-mail subscription, unlocked rewards, offers, or any other collectibles of our platform within 30 calendar days.

### **Contacting Us**

If there are any questions regarding this privacy policy, you may contact us using the information below.

[info@sneakertracker.com](mailto:info@sneakertracker.com)

Lupeny utca 1/b  
Budapest  
Hungary  
H-1026

## THIRD-PARTY DISCLOSURE

### Do we disclose the information we collect to Third-Parties?

We may sell, trade, or otherwise transfer your online (Map / Sneaker Card) or offline (Sneaker Card) data, including your city, town, e-mail address, username or other personally identifiable information to third parties. Your personal identity will not be included in the data profiles, however if you make a purchase at one of our partners through our platform, your data will be used for checkout purposes on the third-party website or webshop.

### Third-party links

We may include or offer third-party products or services on our website.

### Google

Google's advertising requirements can be summed up by Google's Advertising Principles: <https://support.google.com/adwordspolicy/answer/1316548?hl=en>

They are put in place to provide a positive experience for users. As of today, we have not enabled Google AdSense on our website but may do so in the upcoming future.

### California Online Privacy Protection Act

CalOPPA is the first state law in the nation to require commercial websites and online services to post a privacy policy. The law's reach stretches well beyond California to require a person or company in the United States (and conceivably the world) that operates websites collecting personally identifiable information from California consumers to post a conspicuous privacy policy on its website stating exactly the information being collected and those individuals with whom it is being shared, and to comply with this policy. See more at: <http://consumercal.org/california-online-privacy-protection-act-caloppa/#sthash.0FdRbT51.dpuf>

### According to CalOPPA we agree to the following:

- Users are able to visit our site anonymously.
- Once this privacy policy is created, we will add a link to it on our home page or as a minimum on the first significant page after entering our website.
- Our Privacy Policy link includes the word 'Privacy' and can be easily found on the page specified above.
- Users will be notified of any privacy policy changes on our Privacy Policy Page.
- Users are able to change their personal information by emailing us or by modifying their profile.

### How does our site handle do not track signals?

We honor do not track signals and do not track, plant cookies, or use advertising when a Do Not Track (DNT) browser mechanism is in place.

## **Fair Information Practices**

The Fair Information Practices Principles form the backbone of privacy law in the United States and the concepts they include have played a significant role in the development of data protection laws around the globe. Understanding the Fair Information Practice Principles and how they should be implemented is critical to comply with the various privacy laws that protect personal information.

**In order to be in line with Fair Information Practices we will take the following responsive action, should a data breach occur:**

We will notify the users via email within 5 business days.

We also agree to the Individual Redress Principle, which requires that individuals have a right to pursue legally enforceable rights against data collectors and processors who fail to adhere to the law. This principle requires not only that individuals have enforceable rights against data users, but also that individuals have recourse to courts or government agencies to investigate and/or prosecute non-compliance by data processors.

## **CAN-SPAM Act**

The CAN-SPAM Act is a law that sets the rules for commercial email, establishes requirements for commercial messages, gives recipients the right to have emails stopped from being sent to them, and spells out tough penalties for violations.

**We collect your email address in order to:**

- Send you news updates about the SneakerTracker platform and its features/activities;
- Notify you if you are a winner of SneakerTracker's activations/raffles/sweepstakes;
- Notify you if you are eligible for a coupon/discount/reward from SneakerTracker or any of its partners through the platform;
- Provide a communications channels between you and SneakerTracker.

If at any time you would like to unsubscribe from receiving future emails, you can email us at [info@sneakertracker.com](mailto:info@sneakertracker.com) and we will promptly remove you from **ALL** correspondence.