Before you scroll, read this

This Policy applies to LuxTechSystems SA as well as to all its subsidiaries and products, especially LetzTrail App and Website and www.opengpxfiles.com. In this Policy, we refer to "LetzTrail" for all services of LuxTechSystems SA.

Please note however that www.opengpxfiles.com is a platform for the free sharing of GPX files for outdoor activities and does not log any personal data and does not require the creation of a profile.

It's really hard to make everyone happy with a Privacy Policy. Most people who use LetzTrail want something short and easy to understand. While we wish we could fit everything you need to know into a Tweet, our regulators ask us to meet our legal obligations by describing them all in a lot of detail.

With that in mind, we've written our Privacy Policy as simply as possible to empower you to make informed decisions when you use LetzTrail by making sure you understand and have control over the information we collect, how it's used, and when it's shared.

So if you skip reading the Privacy Policy in detail, at least read the summary below and know this:

- LetzTrail is a public platform
- We collect some data about you
- Affiliated services may have their own policies
- We use your data to make our products better
- You can control your experience
- If you have questions about how we use your data, just drop us a mail

Summary

Capture and sale of data	
Do we sell your personal data?	No
Do we share or sell aggregated statistical data from our users?	Yes
Do we share data with third parties other than our partners?	Yes with your consent
Do we share your personal data for advertisement purposes?	No, advertisers will be able to target specific targeted groups of users of which you may be part of
Do we use physical data of yours?	No
Do we use your personal contact list?	No
Do we delete your data once you close your account?	Yes, but we will keep the GPX/trails that you shared
Do we keep your data as long as necessary, except if you ask the deletion?	Yes
Confidentiality settings	
Can you control who can see your activities and your posts?	Yes, but the GPX/trails will be available to the whole community but anonymously
Can you control who can see your geolocation?	Your geolocation will not be shared to other users that are not part of your private community or groups you are part of.

Can you define who can access your profile?	Yes
Can you download and delete your data?	Yes
Tracing	
Do we trace the geolocation of your device to provide you the services?	Yes
Do we trace the geolocation of your device when LetzTrail is not in use?	No
Do we trace your browsing activities on other sites?	No
Do we listen to you when your microphone is in use?	No, we never listen to you
Communication	
Are you notified when there are important changes in this policy?	Yes
Do we send you marketing communications?	Yes, according to local regulation
Do we send push notifications to mobile devices?	Yes

What happens with my data?

What data do you collect about me?

You give some data, we get some data. In return we offer useful services. Not what you had in mind? Check your settings.

1. Collected information

The information we collect when you use LetzTrail falls into three categories:

1.1.   Information you provide us

To use some of our products and services you need to have an account, and to create an account, you need to provide us certain information. Likewise, if you use our paid products and services, we cannot provide them to you without getting payment information. Basically, certain information is necessary if you want to use many of our products and services.

Personal Accounts. If you create an account, you must provide us with some information so that we can provide our services to you. This includes a display name (for example, "LetzTrail Peter"); a username (for example, @LetzTrailPeter); a password; an email address; a year of birth; your display language; and third-party single sign-in information (if you choose this sign-in method). You can also choose to share your location in your profile and Posts. Your profile information, which includes your display name and username, is always public, but you can use either your real name or a **pseudonym**, which we recommend. Howver, you cannot create multiple LetzTrail accounts with the same email address.

Professional Accounts. If you create a professional account, you also need to provide us with a professional category, and may provide us with other information, including street address, contact email address, and contact phone number, all of which will always be public.

Payment Information. In order to purchase ads or other offerings provided as part of our paid products and services you will need to provide us payment information, including your credit or debit card number, card expiration date, CVV code, and billing address.

Preferences. When you set your preferences using your settings, we collect that information so that we can respect your preferences.

1.2. Information we collect when you use our services

When you use our services, we collect information about how you use our products and services. We use that information to provide you with products and services, to help keep LetzTrail more secure and respectful for everyone, and more relevant to you.

Usage Information. We collect information about your activity on LetzTrail, including:

- Posts and their content (including the date, application, and version of LetzTrail), the users you are following and communities you are a part of.
- Searches in the regions you want to visit for future outdoor activities.
- Your interactions with other users' content, such as reposts, likes, shares, replies, if other users mention or tag you in content or if you mention or tag them.
- How you interact with others on the platform, such as people you follow and people who follow you.
- If you communicate with us, such as through email, we will collect information about the communication and its content.
- We collect information on links you interact with across our services (including in our emails sent to you).

Device Information. We collect information from and about the devices you use to access LetzTrail, including:

- Information about your connection, such as your IP address and browser type.
- Information about your device and its settings, such as device and advertising ID, operating system, carrier or language.

Location Information. When you use LetzTrail, we collect some information about your approximate location to provide the service you expect, including showing you relevant ads for the region you are visiting. You can also choose to share your current precise location or places where you've previously used LetzTrail by enabling these settings in your account.

Inferred Identity. We may collect or receive information that we use to infer your identity as detailed below:

- When you sign into LetzTrail on a browser or device, we will associate that browser or device with your account. Subject to your settings, we may also associate your account with browsers or devices other than those you use to sign into LetzTrail (or associate your signed-out device or browser with other browsers or devices or LetzTrail-generated IDs).
- When you provide other information to LetzTrail, including an email address, we associate that information with your LetzTrail account. Subject to your settings, we may also use this information in order to infer other information about your identity, for example by associating

your account with hashes of email addresses that share common components with the email address you have provided to LetzTrail.

- When you access LetzTrail and are not signed in, we may infer your identity based on the information we collect.

Log Information. We may receive information when you view content on or otherwise interact with our products and services, even if you have not created an account or are signed out, such as:

IP address; browser type and language; operating system; the referring webpage; access times; pages visited; location; your mobile carrier; device information (including device and application IDs); search terms and IDs (including those not submitted as queries); ads shown to you on LetzTrail; LetzTrail-generated IDs; and identifiers associated with cookies. We also receive log information when you click on, view, or interact with links on our services.

Advertisements. When you view or interact with ads we serve on or off LetzTrail, we may collect information about those views or interactions (e.g., watching a video ad or preroll, clicking on an ad, interacting with posts of or replies to an ad).

Cookies and similar technologies. Like many websites, we use cookies and similar technologies to collect additional website usage data and to operate our services. Cookies are not required for many parts of our products and services such as searching and looking at public profiles. here.

A cookie is a small text file that websites store on your computer or mobile device when you visit them.

Internal cookies or "own cookies" are cookies created by the website you are visiting. Only that site can read them. A site may also use external services, which also create their own cookies, known as third-party cookies.

They are also cookies that are stored on your computer and are not deleted automatically when you exit your browser, unlike session cookies, which are deleted when you exit your browser.

The purpose is to enable the site concerned to remember your preferences (user name, language, etc.) for a certain period of time.

How do I manage cookies?

Delete cookies from your device: You can delete all the cookies already on your device by deleting your browser's browsing history. This will delete all the cookies from the sites you have visited. However, you should be aware that you may lose some of the information stored (such as connection data or site preferences).

- Managing cookies specific to certain sites: For more detailed control of cookies specific to different sites, consult your browser settings relating to privacy protection and cookies.
- Blocking cookies: Most modern browsers can be configured to prevent cookies being saved on your device, but you may then have to enter some of your preferences each time you visit a site/page. In addition, certain services and functions may not be available (login using a profile, for example).

Interactions with our content on third-party sites. When you view our content on third-party websites that integrate LetzTrail content such as embedded timelines, we may receive log information that includes the web page you visited.

1.3.   Information we receive from third parties

When you use other online products and services, they may share information about that usage with us.

Ad Partners, Developers, Publishers. Our ad and business partners share information with us such as browser cookie IDs, LetzTrail-generated identifiers, mobile device IDs, hashed user information like email addresses, demographic or interest data, and content viewed or actions taken on a website or app. Some of our ad partners, particularly our advertisers, also enable us to collect similar information directly from their website or app by integrating our advertising technology. Information shared by ad partners and affiliates or collected by LetzTrail from the websites and apps of ad partners and affiliates may be combined with the other information you share with LetzTrail and that LetzTrail receives, generates, or infers about you described elsewhere in this Privacy Policy.

Other Third Parties, Account Connections, and Integrations. We may receive information about you from third parties who are not our ad partners, such as other LetzTrail users, developers, and partners who help us evaluate the safety and quality of content on our platform, our corporate affiliates, and other services you link to your LetzTrail account. You may choose to connect your LetzTrail account to your account on another service, and that other service may send us information about your account on that service.

How do you use my information?

To make LetzTrail the service you know and love.

2. How We Use Information

Breaking down how we use the information we collect is not simple because of the way the systems that bring our services to you work. For example, the same piece of information may be used differently for different purposes to ultimately deliver a single service. We think it's most useful to describe the five main ways we use information and if you have questions that are not answered, you can always contact us.

2.1. We operate, improve and personalize our services

We use the information we collect to provide and operate LetzTrail products and services. We also use the information we collect to improve and personalize our products and services so that you have a better experience on LetzTrail, including by showing you more relevant content and ads, suggesting people and topics to follow, enabling and helping you discover affiliates, third-party apps, and services.

We may use the information we collect from accounts of other services that you choose to connect your LetzTrail account to provide you features like cross-posting or cross-service authentication, and to operate our services.

We use your information to provide our advertising and sponsored content services subject to your settings, which helps make ads on LetzTrail more relevant to you. We also use this information to measure the effectiveness of ads and to help recognize your devices to serve you ads on and off of LetzTrail. Some of our ad partners also enable us to collect similar information directly from their website or app by integrating our advertising technology. Information shared by ad partners and affiliates or collected by LetzTrail from the websites and apps of ad partners and affiliates may be

combined with the other information you share with LetzTrail and that LetzTrail receives, generates, or infers about you, as described elsewhere in our Privacy Policy.

2.2. Foster safety and security

We use information we collect to provide for the safety and security of our users, our products, services, and your account. This includes verifying your identity, authenticating your account, and defending against fraud, unauthorized use, and illegal activity. We also use the information to evaluate and affect the safety and quality of content on LetzTrail - this includes investigating and enforcing our policies and and terms, as well as applicable law.

2.3. We measure, analyse and make our service better

We use the information we collect to measure and analyse the effectiveness of our products and services and to better understand how you use them in order to make them better.

2.4. We communicate with you about our services

We use the information we collect to communicate with you about our products and services, including about product updates and changes to our policies and terms. If you're open to hearing from us, we may also send you marketing messages from time to time.

2.5. Research

We use information you share with us, or that we collect to conduct research, surveys, product testing, and troubleshooting to help us operate and improve our products and services.

How or when do you share my information?

3. Sharing information

You should know the ways we share your information, why we share it, and how you can control it. There are five general ways we share your information.

3.1. When you post and share

NO- Not in LetzTrail - With the general public. You are directing us to disclose that information as broadly as possible. LetzTrail content, including your profile information (e.g., name/pseudonym, username, profile pictures), is available for viewing by the general public. The public does not need to be signed in to view much of the content on LetzTrail.

With other LetzTrail users from your network. Depending on your settings, and based on the LetzTrail products and services you use, we share your interactions with LetzTrail content of other users of shared communities, friends etc, or especially professional users, such as likes, and people you follow.

With partners. Depending on your settings, we also provide certain third parties with information to help us offer or operate our products and services. However, the information we share is statistical and limited to the area you are residing in or visiting, your age group, your favourite outdoor activities, the activities you made using LetzTrail etc. However, at no point in time, we will share your personal data.

3.2. With third parties and third-party integrations

With service providers. We may share your information with our service providers that perform functions and provide services on our behalf, including payment services providers who facilitate payments; service providers that host our various blogs and wikis; service providers that help us understand the use of our services; and those that provide fraud detection services.

With advertisers. Advertising revenue enables us to provide our products and services. Advertisers may learn information from your engagement with their ads on or off LetzTrail. For example, if you click on an external link or ad on our services, that advertiser or website operator might figure out that you came from LetzTrail, along with other information associated with the ad you clicked, such as characteristics of the audience it was intended to reach and other LetzTrail-generated IDs for that ad. They may also collect other personal information from you, such as cookie identifiers, or your IP address.

Third-party content & integrations. We share or disclose your information with your consent or at your direction, such as when you authorize a third-party web client or application to access your account or when you direct us to share your feedback with a business. Similarly, to improve your experience, we work with third-party partners to display their video content on LetzTrail or to allow cross-platform sharing. When you watch or otherwise interact with content from our video or cross-platform sharing partners, they may receive and process your personal information as described in their privacy policies.

3.3. When required by law, to prevent harm or in public interest

We may preserve, use, share, or disclose your information if we believe that it is reasonably necessary to:

- comply with a law, regulation, legal process, or governmental request;
- protect the safety of any person, protect the safety or integrity of our platform, including to help prevent spam, abuse, or malicious actors on our services;
- explain why we have removed content or accounts from our services (e.g., for a violation of LetzTrail Rules);
- address fraud, security, or technical issues; or
- protect our rights or property, or the rights or property of those who use our services.

3.4. With our affiliates

We may share information amongst our affiliates to provide our products and services.

3.5. As a result of change of ownership

We may share, sell, or transfer information about you in connection with a merger, acquisition, reorganization, sale of assets, or bankruptcy. This Privacy Policy will apply to your personal information that is shared with (before and after the close of any transaction) or transferred to the new entity.

Does data have an expiration date?

How long do you keep data?

Generally, we keep your data as long as your account is up.

4. How Long We Keep Information

We keep different types of information for different periods of time:

- We keep your profile information and content for the duration of your account.
- We generally keep other personally identifiable data we collect when you use our products and services for a maximum of 18 months.
- Remember public content can exist elsewhere even after you remove it from LetzTrail. For example, search engines and other third parties may retain copies of your Posts longer, based upon their own privacy policies, even after they are deleted or expire on LetzTrail.
- Where you violate our Rules and your account is suspended, we may keep the identifiers you used to create the account (i.e., email address or phone number) indefinitely to prevent repeat policy offenders from creating new accounts.
- We may keep certain information longer than our policies specify in order to comply with legal requirements and for safety and security.

How can I control my data?

You can access it, delete it, or change your settings. Basically, you're in control.

If you have any questions or if you wish to access, modify, rectify and/or delete your data, please contact us at the addresses indicated in article 9.

5. Take control

5.1. Access, correction, portability

You can access, correct, or modify the information you provided to us by editing your profile and adjusting your account settings.

- You can learn more about the information we have collected or inferred about you in Your LetzTrail Data and request access to additional information per email.
- You can download a copy of your information, such as your Posts, by following the instructions here.

To protect your privacy and maintain security, we take steps to verify your identity before granting you access to your personal information or complying with a deletion, portability, or other related request. We may, in certain situations, reject your request for access, correction, or portability, for example, we may reject access where you are unable to verify your identity.

5.2. Deleting your Information

If you follow the instructions in LetzTrail, your account will be deactivated. When deactivated, your LetzTrail account, including your display name, username, and public profile, will no longer be viewable on LetzTrail.com, LetzTrail for iOS, and LetzTrail for Android. For up to 30 days after deactivation it is still possible to restore your LetzTrail account if it was accidentally or wrongfully deactivated.

5.3. Objecting to, restricting, or withdrawing your consent

You can manage your privacy settings and other account features. If you change your settings it may take some time for your choices to be fully reflected throughout our systems. You may also notice changes in your LetzTrail experience or limitations in your ability to access certain features depending on the settings you've adjusted.

5.4. Authorized agent request

To submit a request related to access, modification, or deletion of your information, or someone else's information if you are their authorized agent, you may also contact us as specified in the How To Contact LetzTrail section of our Privacy Policy below. We may require you to provide additional information for verification.

How does LetzTrail handle my information wherever I am?

We treat your information fairly, no matter where you live around the world.

6. Your rights and ours

We provide LetzTrail to people all over the world and provide many of the same privacy tools and controls to all of our users regardless of where they live. However, your experience may be slightly different than users in other countries to ensure LetzTrail respects local requirements.

6.1. We have specific legal bases to use your information

LetzTrail has carefully considered the legal reasons it is permitted to collect, use, share and otherwise process your information. And no, we don't sell your personal information.

6.2. We move your data to make LetzTrail work for you

Just as you use LetzTrail to seamlessly participate in global conversations with people in countries all over the world, LetzTrail may move information across borders and to different countries around the world to support the safe and reliable service you depend on. For example, if you live in Europe and are having a conversation with someone in the United States, information has to move between those countries to provide that experience – it's what you expect from us.

We also use data centers and cloud providers, and engage our affiliates and third-party partners and service providers located in many parts of the world to help us provide our services. Before we move data between countries we look at the risks that may be presented to the data and rely on things like

standard contractual clauses, where applicable, to ensure your data rights are protected. If data will be shared with a third party, we require them to maintain the same protections over your data that we provide directly.

Is LetzTrail for kids?

Nope, LetzTrail is not intended for people under 15.

7. LetzTrail's Audience

Our services are not directed to children, and you may not use our services if you are under the age of 15. You must also be old enough to consent to the processing of your personal data in your country (in some countries we may allow your parent or guardian to do so on your behalf).

Will this policy change?

If it does, we'll let you know.

8. Changes To This Privacy Policy

The most current version of this Privacy Policy governs our processing of your personal data and we may revise this Privacy Policy from time to time as needed.

If we do revise this Privacy Policy and make changes that are determined by us to be material, we will provide you notice and an opportunity to review the revised Privacy Policy before you continue to use LetzTrail.

How can I contact LuxTechSystems?

9. How To Contact LuxTechSystems for any provided service

If you want to contact us, you can send an email to

LuxTechSystems SA
Attn: Data Protection Officer
185, Val Sainte-Croix
L- XXX Luxembourg
LUXEMBOURG

You can confidentially contact LuxTechSystems's Data Protection Officer per email to GDPR@letztrail.com.