

# FASTING TRACKER PRO APP | PRIVACY POLICY

Last updated: May 10, 2019

We want to use this Privacy Policy to explain in detail which information we collect about you when you use our app (which we will simply call the "Service"), how and whom we share it with, and how you can access as well as control your information. We have embraced and implemented the changes governed by the GDPR (General Data Protection Regulation, an EU-wide privacy and data protection law) not only within our Privacy Policy, but also in the way we handle data within the app.

We do not collect any personal data from you or data that can be related to your personal information. This Privacy Policy therefore covers in detail why we collect certain anonymous data and how we handle this data.

This Privacy Policy is set out by the Drama Labs UG (haftungsbeschränkt) (hereinafter "Fasting Tracker", "we", "us", "the application", "the app"), Kaiserstr.13, 80801 Munich, Germany (Managing Directors: Marius Pollin, Jens Bosse Parra, Julia Klinger).

You should read this Privacy Policy carefully. By using our Service you are accepting the practices described in this Privacy Policy.

## 1. DATA ABOUT YOU THAT WE COLLECT, PROCESS AND USE

To make our Service work and ensure a great user experience, we collect and store certain anonymized information about user behaviour. As your privacy is important to us, we will inform you in the following policy which information we are and are not storing.

Most importantly for you, when you are using our Service we do not collect any **'Personal Data'** from you that can identify you, such as your name, email address, postal address, telephone number or financial information. Thus, we are also not processing or using such personal data from you.

However, we do collect certain anonymized information. By using the Service, you are authorizing us to gather, parse and retain such data. We offer you the option to opt-out of this collection of anonymous usage data in our app's settings.

### 1.1 Information collected at the time of registration

When using the Service, an anonymous account will be created for you automatically by generating a random user number based on your mobile device. This number makes it possible for you to use the app (e.g. by connecting your device anonymously to previous fasting times you stored or the subscriptions you bought). This anonymous account cannot be related to your name or other personal information about you.

### 1.2 Information about app usage

When you use our Service, we may also collect information on how our members are behaving. We do this to constantly improve our Service to fit your needs. In the following we list all the information we collect in detail. None of this information can be related to you as a person or your personal data, but is also gathered in anonymized form:

- **Device Information:** We collect information about your device, such as the hardware model, operating system version, browser type, and mobile network information, primarily to diagnose and solve crashes and other problems that may arise during app usage.
- **Content & Usage information:** We may collect information about how you use the app, the content you view and how you interact with it (e.g. saving or liking content).
- **Log Information:** We collect log file information when you use your Service, such as device information, access times, your IP Address and details about how you have used our Service.

### **1.3 Opt-out of anonymized data collection**

If you want us to stop collection anonymized usage data about your account, we offer you a possibility to opt-out of this within the app's Settings. To reach this setting, please swipe left on the app's home screen, find the choice "Anonymous Analytics Enabled" (4th cell from the top) and disable.

## **2. DURATION OF STORAGE OF DATA**

Unless we do not indicate a shorter period in this privacy policy, we generally store the collected data only as long (i) as required for the provision of the Services to you, and/or (ii) as it is necessary with regard to the contractual relationship with you, thereafter only if and to the extent that we are obliged to do so by mandatory statutory retention obligations. If we no longer require the respective data for the purposes described above, it will only be stored during the respective legal retention period and not processed for other purposes.

## **3. SHARING YOUR INFORMATION WITH THIRD PARTIES**

We do not share any of the aggregated, non-personal information we collect with others except as indicated in this Privacy Policy or when we inform you.

We may share this information, with third parties who assist us in operating the Service and conduct some processing of your information on our behalf, such as analytics or ad tracking. These providers may only have access to information needed to perform their specific service, but are not permitted to share or use such information for any other purpose. We may also share aggregated, non-personal information with third parties, including advisors, advertisers and investors, for the purpose of conducting general business analysis or other business purposes. The specific services we may use are listed below (*see 4*).

Further, we may be legally obliged to disclose your information to third parties by a statutory authority with the appropriate jurisdiction. We may also be obliged to do so in order to enforce or apply our terms of use, to protect the rights, property or safety of our Service, our customers, our Service's members, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection.

## **4. USE OF THIRD-PARTY SERVICES**

The third parties listed below assist us in operating our Service. For example, we may utilize third-party analytics companies who will gain access to anonymous data (such as your device ID, usage behaviour and operating system version). They use this data solely on our behalf.

### **4.1 Mixpanel**

We use Mixpanel, an advanced analytics service, that helps us improve our app by tracking how members interact and engage. Usage information is stored by Mixpanel and is subject to their privacy policy.

Mixpanel Privacy Policy: <https://mixpanel.com/privacy/>

Mixpanel Data Processing Addendum: <https://mixpanel.com/legal/dpa>

### **4.2 Amazon Web Services**

We also use Amazon Web Services (AWS) for backend hosting/ data storage purposes. AWS is bound by confidentiality and may not transfer the data, unless in anonymized form and by following the Privacy Shield requirements governed by the European Commission.

AWS Privacy: <http://aws.amazon.com/privacy/>

AWS Data Processing Addendum:

[https://d1.awsstatic.com/legal/aws-gdpr/AWS\\_GDPR\\_DPA.pdf](https://d1.awsstatic.com/legal/aws-gdpr/AWS_GDPR_DPA.pdf)

### **4.3 Apple Health**

With your explicit consent (that we ask from you when using the app), we may also use the HealthKit framework from Apple (Apple Inc., 1 Infinite Loop, Cupertino, CA 95014, USA) to access and share health and fitness data collected on iPhone and Apple Watch. The HealthKit framework provides a central repository for health and fitness data on Apple devices. The Service may use existing data - which may include data on gender, weight, body fat, heart rate, energy burned, calory intake and activitiy types - for research purposes and to create a personalised fasting experience, as well as improve its outcome for each customer. We will not use any of this information for advertising purposes.

In the future, new data attributes may be added to the HealthKit framework - in this case we will inform you by updating this Privacy Policy or asking your consent.

You may always stop this access through your phone's settings. Also, you may select which data you wish to share.

More information on Apple HealthKit: <https://developer.apple.com/documentation/healthkit>

## **5. CHILDREN'S PRIVACY**

Our Service and its content is not directed at children under the age of 13. Therefore, we do not knowingly collect or solicit information from individuals under the age of 13 or knowingly allow such persons to register for the Service. Should we learn that we have collected information from an individual under the age of 13 without parental consent, we will make sure to delete that information as quickly as possible.

## **6. DATA SECURITY AND STORAGE**

Unfortunately, the transmission of information via the internet is not completely secure. Although we will take all reasonable measures to help safeguard your data from unauthorized access and disclosure, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

While the Service operates from Munich, Germany, we our Affiliates, or Service Providers may transfer information that we collect about you across borders and from your country or jurisdiction to other countries or jurisdictions around the world whose local data-protection and privacy laws may offer fewer protections than those in your country of residence or from any country where you use or access the services.

## **7. NO RIGHTS OF THIRD PARTIES**

This Privacy Policy does not create rights enforceable by third parties or require disclosure of any personal information relating to users of the application.

## **8. CHANGES TO THIS POLICY**

We may occasionally update this Privacy Policy. All such changes will take effect once a revised version has been uploaded [here](#), therefore made available to you via our website or mobile app. In some cases we may give you additional notice, e.g. via in-app notification. By continuing to use the application you will be deemed to have accepted any such changes

## **10. HOW TO CONTACT US**

If you do have any questions or comments about this Privacy Policy, feel free to contact us by email: [fastingtimer<at>mydrama.de](mailto:fastingtimer@mydrama.de)

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