TRAVEL PLANNER APP | PRIVACY POLICY

Last updated: October 24, 2023

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 GmbH (hereinafter "Travel Planner App", "we", "us", "the application", "the app"), Augustenstr. 68a, 80333 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, which means the data collected cannot be traced back to an individual.

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 is stored locally on your device, enabling you to access previous trips and use the app. 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 to 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 and interact with it.

- **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 Optional information provision

For the purpose of tailoring the travel recommendations, we may ask you for your age range and gender. However, providing this information is entirely optional with a choice of selecting 'prefer not to say'. This data is not saved and is only used to improve the information provided for a single trip, after which it is discarded.

2. DURATION OF STORAGE OF DATA

Unless indicated otherwise 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 OpenAI API

Our Service utilizes the OpenAI API to provide enhanced travel recommendations based on user input. When you search for locations and select interests, your input is processed by OpenAI to generate suggestions tailored to your preferences. No personal data is sent to or stored by OpenAI through our Service; only anonymized data relevant to generating travel recommendations is transmitted.

OpenAI Data Usage Policy: https://openai.com/enterprise-privacy

4.2 Google Places API

We employ the Google Places API to facilitate location searches and provide additional information about selected places. Initially, the Google Places API is used for autocompleting search queries, assisting you in finding locations swiftly. It may also be utilized to display detailed information about places you are interested in. The data exchanged with the Google Places API is anonymized and does not contain any personal information.

Google Places API Policy: https://developers.google.com/places/web-service/policies

Google Maps Platform Terms of Service: https://cloud.google.com/maps-platform/terms

Google Privacy Policy: https://policies.google.com/privacy

4.3 Firebase Crashlytics

In order to increase the stability and reliability of our Service, we need anonymized crash reports that are provided by Firebase Crashlytics, a service of Google Ireland Ltd.. In case of a crash, anonymous information (state of the app at the time of the crash, crash-trace, installation UUID, device operating system and last log messages) will be transferred to the US servers of Google. This information does not inclued any personal data.

Crashlytics Data Processing Terms: https://firebase.google.com/terms/crashlytics-app-distribution-data-processing-terms/
Crashlytics Terms of Use: https://firebase.google.com/terms/crashlytics/

4.4 Google Analytics for Firebase

We use Google Analytics for Firebase, a service of Google Ireland Ltd., for statistical analysis of the user interaction within the app, with the goal to constantly improve our service and features. To this end anonymous usage data such as end-user device information, number and duration of sessions, operating systems used and information on in-app requests/events is transmitted to Google and stored in servers managed by Google. Firebase does not collect any personal data. You can opt-out of the collection of analytics data with firebase analytics anytime in the App's Settings by turning off "Enable anonymous analytics".

Firebase Privacy Policy: https://firebase.google.com/support/privacy
Google Analytics Terms of Service: https://marketingplatform.google.com/about/analytics/terms/us/

4.5 Google Cloud Platform

We use also use selected services of the Google Cloud Platform (Big Query and Looker Studio) for purposes of advanced data analytics and visualization on the basis of the data collected

through Google Analytics for Firebase. As laid out in the previous paragraphs, we do not collect any personal data in the first place and thus will not process any such data in the use of these services.

Google Cloud Platform Privacy Policy: https://cloud.google.com/privacy
Google Cloud Platform Terms of Service: https://cloud.google.com/terms
Google Cloud Platform Services Summary: https://cloud.google.com/terms/services

4.6 Google Ads

For the purpose of promoting our application, we employ Google Ads, a third-party service provided by Google Ireland Ltd.. While Google Ads helps us increases app visibility and improve our marketing strategies, no personal data is used for these campaigns. Instead, our use of Google Ads is focused on general patterns of app usage and downloads data gathered and processed by Google Ads. All data gathered and processed by Google Ads adheres to Google's Privacy Policy and Data Processing Terms.

Google Ads Data Processing Terms: https://business.safety.google/adsprocessorterms/
Google Privacy Policy: https://policies.google.com/privacy

5. CHILDREN'S PRIVACY

We do not knowingly collect, solicit, or store personal information from children under the age of 13 without parental consent, in accordance with the Children's Online Privacy Protection Act (COPPA). Given the absence of personal information collection in our Service, there's no personal data to manage or delete. If you have concerns about our data practices or believe that we might have inadvertently collected information, please contact us.

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: **help<at>mydrama.de**

Drama Labs GmbH
Augustenstr. 68a
80333 Munich, Germany