

Privacy policy

We, Simplicity Tech, Inc., with its address at 535 Mission Street, 14th Floor San Francisco, California 94105, United States and our local contractors including PERRY SOFT a.s and Simplicity Ltd. (“**Simplicity**”, “**we**”, “**us**”, or “**our**”), are the provider of news, official documents and information, effective and modern communication tools between residents and its town, and other available functionalities related to the individual town, city or municipality.

This policy concerns our privacy and data collection, processing and transfer practices (the “**Privacy Policy**”) and describes how we treat the information we collect when you visit and use the website available at <https://onesimplicity.com/> (the “**Website**”) and Simplicity’s other domains, products, services, mobile applications, and content (collectively with the Site, the “**Services**”). By accessing our Services, you are acknowledging that this Privacy Policy and our Terms of Service available at: <https://www.onesimplicity.com/legal/terms-of-service/> (the “**Terms of Service**”) apply to your use of the Services and that you agree to be bound by this Policy and our Terms of Service.

Simplicity is a controller for the personal data processed under this policy and therefore is responsible for your personal data processing. All changes we make to our privacy policy in the future will be posted on our Website. Please check back frequently to see any updates or changes to our privacy policy.

This policy was last updated in September 2021.

1. Personal Data We Collect and Process

1.1. We may process the following personal data to:

- 1.1.1.** Provide our Services, including access to Services, support services and updates. This also includes the usage of essential cookies for the facilitation of our Website. We process your personal data for this purpose under performance of the contract,
- 1.1.2.** Deliver direct marketing messages and advertisements to your email or other indicated channel. We process your personal data for this purpose under your consent,
- 1.1.3.** Process your request through our Website and/or Services including, but not limited to, contacting us or applying for an open job vacancy,
- 1.1.4.** Optimise our Website and Services to continuously improve our Service. We process your personal data for this purpose under consent,

- 1.1.5. Deliver content to you which we believe you would be interested in based on your previous interactions with Simplicity. We process your personal data for this purpose under legitimate interest. More information can be found in 1.2,
 - 1.1.6. Fulfil our legal obligations and defend claims in the case of proceedings before public authorities. We process your personal data for this purpose to stay in compliance with our legal obligations.
- 1.2. If you have used our Service in the past and provided us with your email address, we may contact you at this email address to promote our Services, special offers, news and provide other information related to our Services via our newsletter. However, you have the option to choose not to receive our newsletters by ticking the appropriate check box when submitting your email. You may also unsubscribe from our newsletter at any time by ticking the appropriate check box or by using the link in the newsletter.
- 1.3. Personal data categories that we process may include your:
 - 1.3.1. personal details (including your name, surname, date of birth),
 - 1.3.2. contact details (including your address, phone number, email address),
 - 1.3.3. professional details (including your name of the company/city/town/municipality, that you work for and any other information you may provide about your role),
 - 1.3.4. personal data you provide in communication via the Services, Website, telephone, email or otherwise by you.
 - 1.3.5. The content you provide to the Services: The Simplicity Services are based directly upon content that users provide when using the Services. This content consists of the various pieces of information associated with the individual issue reports submitted through Simplicity Services. This information can include your name, the title of the issue, a textual description of the issue, the physical location of the issue, and a user-provided photograph and/or video showing the issue. In many cases, the default physical location of the issue is generated from obtaining GPS or other geolocation information directly from the user's computer or mobile device. **By default, all user-provided content is shared with the city office and is accessible to the assigned city official as a result of the normal use of Simplicity Services.**
 - 1.3.5.1. It is also possible that user-provided content may contain identifying information about other people and the user

including unregistered users. For example, a user might include a name or identifying information about a person or property in the textual description of an issue report. Or a user might include an image, a video, or a voice recording of another person as part of an issue report.

1.4. Other data that we obtain from you when you use our Website and Services include:

1.4.1. Technical information on our Website and Services, including, where applicable, the Internet Protocol (IP) address used to connect your computer to the Internet, your login credentials, specific online identifiers (for example Apple ID), browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, image metadata, information about your visit, including your clickstream to, through and from our website (including date and time), page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, number and frequency of our visitors, which pages or features of the Services they have visited, which links on the Services they have clicked on, and the length of those visits. We may also use third party applications and services, as well as in house systems to collect and analyze this information.

1.4.1.1. Without collecting the IP address from you and processing it, we cannot connect you to the nearest server, which is necessary for the provision of our Services (it means that we do not permanently store the IP address, and it is only used to find the place where the server answer of your request should be sent to). The IP address is stored in our system only in an anonymized form.

1.4.1.2. We use all technical information in aggregate form, that is, as a statistical measure related to all of our users that would not identify you personally.

1.4.1.3. We collect this information to improve the Services and provide additional features and functionality.

1.4.2. Our use of cookies to process personal data is explained in our section on cookies.

1.4.3. Please note that we require the provision of personal data required to create your account and to properly provide our Services per the Terms and Conditions you have concluded with us. In the event of non-provision

of this information, we are unable to provide our Services properly (for example the use of the website as a logged-in user for the use of services you have ordered).

2. What third parties do we share your data with?

- 2.1.** We have internal policies in place to ensure that your data is only shared with authorised personnel at our company or a verified third party. Our staff might have access to your personal data on a strictly need-to-know basis typically governed and limited by function, role and department of the particular employee.
- 2.2.** Please note that we may only disclose your personal data to service providers that have undertaken the necessary security measures to protect your data. When we share personal information with others we require them to keep it safe. In this section, you may learn more about who we share your personal information with.
- 2.3.** We may share your personal data with the following recipients:
 - 2.3.1.** our business partners, suppliers, subcontractors and service providers, for example, authorised IT service providers, accounting companies, all to the extent necessary to meet the obligations of these suppliers and service providers in relation to us (if we use sub-contractors to support us in providing services who may process personal data for us, we ensure that selection of our sub-contractors and any processing of personal data by them is compliant with GDPR in terms of technical and organizational security of processing operations);
 - 2.3.2.** other recipients, including:
 - 2.3.2.1.** our advertising and analytics partners, and
 - 2.3.2.2.** in some specific situation, our auditors, legal advisers and other professional consultants and service providers for the purposes described in this document;
 - 2.3.3.** in relation to information obtained via our Website or Services:
 - 2.3.3.1.** analytics and search engine providers that may assist us in the improvement and optimisation of our website and application.
- 2.4.** Our Website and Services may contain links provided by services from third parties. While we try to facilitate access only to those third party services that share our respect for your privacy, we don't take responsibility for the content or privacy policies of those third party services. We encourage you to carefully review the privacy policies of all third party services you access.

3. How do we protect your data?

- 3.1.** We take security measures to protect your personal data processed in hard copies or/and electronically as well from destruction, loss, alteration, unauthorized provision or access to them.
- 3.2.** We have appropriate technical and organisational measures in place, in accordance with the relevant data protection legislation in order to secure our website and as well as other systems used for data processing including SSL, HTTPS, and TLS encryption.
- 3.3.** Our website may contain links to other websites or services of different providers than us. We are not responsible for the content and provision of websites or services of these different providers. This Privacy Policy does not apply to the processing of personal data during browsing or using websites or services of said different providers.
- 3.4.** You are responsible for maintaining the confidentiality of your access data. Therefore, we suggest that you do not disclose your access data to anyone. You should treat your access information as confidential and always remember to log out of your account after you end your activity.

4. How do we store your data?

- 4.1.** Regardless of where you use our Services or otherwise provide information to us, your personal data may be transferred to and maintained on servers located in the United States or elsewhere.
- 4.2.** If you are a European resident, in the event that data is transferred to the United States we use Standard Contractual Clauses and adequacy decisions to ensure personal data protection is maintained at the same standard as in Europe.

5. How do we use cookies?

- 5.1. Cookies:** Cookies are pieces of text that may be sent to and saved by your web browser when you access a website. Your web browser stores these cookies in a way associated with each website you visit, and you can see your cookies through your browser settings.
 - 5.1.1.** Simplicity uses essential web cookies to enable our servers to provide users with the Service and for the security of the Service. Essential cookies can not be refused as they are essential to access the service.

- 5.1.2. Simplicity uses non-essential web cookies to recognize your web browser, provide you will personalised Services and improve our Services. Non-essential cookies are only used with the consent of the User. We use the following non-essential cookies:
 - 5.1.2.1. Google Analytics
 - 5.1.2.2. Facebook
 - 5.1.2.3. Hotjar
 - 5.1.2.4. Hubspot
- 5.2. **Web Beacons:** We may place information called web beacons in our emails to you, which allow us to detect when you read our email messages. This helps us measure our email deliverability and effectiveness.

6. General

- 6.1. **Privacy of Children** Our Site and Services are not intended for use by children 13 years of age and younger, so you must be at least 14 years of age to use the Services. Accordingly, we do not knowingly collect information from or direct the Services to anyone under 14 years of age. We encourage parents and legal guardians to monitor their children's mobile app and Internet usage and enforce our Privacy Policy by instructing their children never to provide Personal Data to Simplicity Services without their parental permission. If you have reason to believe that a child under the age of 14 has provided Personal Data to us, please contact us at info@onesimplicity.com, and we will delete that information from our databases as soon as is reasonably practicable.

7. What are your rights concerning your privacy?

- 7.1. If you would like to exercise any of your rights or receive more information about them, please contact us at info@onesimplicity.com .
- 7.2. Regarding your processed personal data, you have the following rights:
 - 7.2.1. **Right of access** You have the right to gain access to information about the personal data that we process about you. Should you have any questions regarding the processing, or you would like to have more insight about the personal data we process from you, please contact us via the contact details below and we will provide you with further information.
 - 7.2.2. **Right to rectification** You can request from us to correct information inaccurately stored by us without undue delay. You also have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

- 7.2.3. Right to erasure/right to be forgotten** You have the right to request us to permanently delete your personal information. You can make such a request if you for example believe that the personal data are no longer necessary in relation to the purpose for which the personal data were collected or otherwise processed.
- 7.2.4. Right to restrict the processing activities** You have the right to request from us to restrict our processing activities, for example, if you believe we process incorrect personal data about you, for the time being until the correctness of that personal data is verified, or when the processing of your personal data is unlawful.
- 7.2.5. Right to data portability** You have the right to request data that we process about you by automated means based on a contract or consent in a structured, commonly used and machine-readable format, and you have the right to request that we transmit those data to another controller, if technically feasible.
- 7.2.6. Right to complain to a supervisory authority** If you are not satisfied with the method of how we process your personal information, you can contact us at any time to find a solution for your concern.

8. CCPA (California Consumer Privacy Act of 2018)

- 8.1.** Under the California **Consumer Privacy Act of 2018 (the “CCPA”)**, California residents are entitled to ask us for a notice identifying the categories of personal customer information that we share with our affiliates and/or third parties for marketing purposes, and providing contact information for such affiliates and/or third parties. If you are a California resident and would like a copy of this notice, please submit a request to the following address: info@onesimplicity.com.
- 8.2.** California residents are entitled to the above rights. If you would like to exercise any of your rights or receive more information about them, please contact us at info@onesimplicity.com.

9. How can you contact Us?

- 9.1.** If you have any questions or concerns regarding privacy using the Services, please send us a detailed message at info@onesimplicity.com.