

# Privacy Policies - SPAW

## 1. General Information

This privacy policy applies to all "Services" offered by SPAW, which refer to the various search tools, user connection tools, user location features, and other related services on the SPAW website or mobile application.

SPAW and its services are committed to making every effort to respect the privacy of its users and ensure transparency in the collection and retention of data.

This privacy policy governs how SPAW obtains, uses, classifies, and processes information in accordance with the General Data Protection Regulation EU 2016/679, which came into effect in France on May 25, 2018.

## 2. Identity and Contact Information

The data controller is SPAW, a SASU (Simplified Joint Stock Company) registered with the Paris Trade and Companies Register under number 987 516 226, with a share capital of €4,000, SIREN number 9817 516 226, SIRET number 987 516 226 00014, and headquartered at 61 rue de Lyon, 75012, Paris.

The data processor for personal data collection is "Supabase," with its statutory headquarters in Delaware, USA, and its actual headquarters at 970 Toa Payoh North #07-04, Singapore 318992.

## 3. Legal Basis

The data is collected within the framework of the terms of use of the SPAW website or mobile application, as permitted by Article 7 of the aforementioned General Data Protection Regulation. This data is collected based on the user's consent to these terms of use when creating a user account.

## 4. Data Collected

SPAW collects and processes user data to provide a personalized, relevant, and efficient experience. The use of the SPAW website or mobile application involves the collection of the following data:

- Personal information requested during registration (name, date of birth, profile picture...)
- Posted content and its data (date added, locations)
- User activity when streaming video of a location
- Data that the user shares about an establishment/places/events
- Geolocation data when the user has consented to share it

## 5. Use of Collected Data

SPAW collects the aforementioned personal data in order to:

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- Better understand the user to provide more accurate, personalized recommendations, particularly based on previously visited establishments and the user's location
- Allow other users to have additional information about other users or the specific user who creates videos or publishes information about the establishment
- Allow other users to determine who/what type of user (regarding age/interests) as well as places, bars, events
- Allow other users to know with whom they share/have shared usage or time within the chosen establishment
- Optimize the user experience
- Provide recommendations based on user location
- Understand user behavior to provide better recommendations and optimize the user experience

### 6. Choice of Collected Data

Users of the SPAW website or mobile application have a choice in determining which data will be collected. Users can specifically:

- Choose to refuse cookies when accessing the SPAW website
- Refuse SPAW and its services access to their geolocation. However, deactivating the geolocation system may affect the optimal functioning of services offered by SPAW
- Choose to close their user account. SPAW will retain certain data associated with the account for internal purposes, including fraud prevention or dispute resolution. However, closing an account removes the profile from active view and makes the data unavailable to other users

### 7. User Rights

Under the General Data Protection Regulation, each user has the right to access, rectify, or object to the processing of their data.

Under the right to data portability introduced by the aforementioned Regulation, each user who has provided personal data can receive the personal data concerning them and transfer this collected data to another data controller.

### 8. Data Retention Period

Data collected by SPAW and its services is retained for a period of 5 years. However, SPAW reserves the right to delete certain collected data prior to the expiration of the aforementioned period.