



WATCH VAULT

by KLOKKERIET

Data Privacy Policy

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Last updated: 31.03.2022

In order to use Watch Vault and our Services you grant us access to information about you. Our top priority is the privacy of our users. Watch Vault works hard to rightfully process data in compliance with laws and regulations. This document describes what data we collect about you, why we collect the data, how the data is used and on what legal basis the collection of data is made.

When you use Watch Vault and our Services we collect, store and may use the following data to deliver and improve your experience on Watch Vault. Enabling you to communicate with sellers and other users, utilizing third party services for shipping, notifications and payments are all in place to ensure an efficient and safe interaction with the Watch Vault Services. The data is used to reduce misuse of the Services, analyze and understand the market trends to offer an overall better Service accustomed to your interests and usage patterns.

1. Who we are and how to get in touch

This Data Privacy Policy applies to data processing by:

Watch Vault AS (hereinafter "Watch Vault"), Reg. no 920504248, a company duly incorporated and organized under the laws of Norway, having its registered address at Martin Linges vei 25, 1364 Fornebu.

If you need to contact us for feedback, questions or concerns about this data privacy policy or about our use of your information please use our address or email privacy@watchvault.org.

2. The personal data we collect

a) Account information

In order to register a user account, you are required to provide personal data. Depending on the sign-up method of your choice this data can include your full name, email address, username, phone number, address and connection to Facebook, Google or Apple. This represents the only information you have to provide to create an account with Watch Vault.

b) Information from Third-party service

If you sign-up a user account by linking your Facebook, Google or Apple ID you share a reference to the chosen provider. On the basis of the method you select you may also share your name, email address, profile picture, language and friend list. You can stop sharing third-part information at any time by revoking our access to that service.

Access to personal data can be granted Watch Vault when you create or add information to your listings, profile and social posts. Furthermore, personal data can be shared with Watch Vault when you write messages to our support or other users, or in reviews and comments you give us or other users.

c) Card and bank information

Watch Vault provides features which enable transactions between you and us or you and other Watch Vault users. If you activate these features, you will provide certain information for identification and verification, such as your name, address, date of birth, card number, bank account IBAN number, card expiration date, and Card Verification Value (CVV) number.

This information is stored with a third-party, Stripe, which handles payments for Watch Vault. The information is encrypted and sent to the card network, which if approved returns a identifier which is a random set of characters that is used for engaging in transactions without exposing your card information to others.

Watch Vault does not store this information on our servers, we only store references to the information stored within Stripe. You can remove the identifier from your account from the account settings or by deleting your account. Note that third-party payment processors may retain this information in accordance with their own privacy policies and terms, or as required by law. Stripe's full privacy policy and terms are available [here](#).

d) Additional information

In order to improve your experience or enable certain features of Watch Vault you can choose to provide us with additional information such as your phone number, address, date of birth, banking information or other information. You can choose to provide said information to our Customer Support in case you require assistance.

To connect with friends on Watch Vault or to invite friends who have not yet signed-up for our Services you may provide their email addresses or social media accounts.

In case you participate in contests, surveys or promotions we store the information you submit upon participation. This information may include username, user account details, your name, contact information and text answers you provide.

If you have expressly consented to receive our newsletter, we use your e-mail address to send you our personalized regular newsletter.

If you send us a written letter or e-mail, we store information such as your name, address, e-mail address, phone number or other data you share in said forms of communication.

e) Automatically collected information

When you use our apps or visit watchvault.org, and other pages we use, different technologies and functionality are applied to provide the best possible user experience.

- i. Watch Vault automatically collect information about which technology you use. This information may include your network operator, your browser, IP address, device or similar. The collected data depends on the device you are using.
- ii. Location information data about where you are is automatically collected when you consent to location sharing in Watch Vault. Your location information data will be collected if you actively select to share your location within the Services. Your IP address can be used to derive your approximate location. Location information data consent can be disabled within the Watch Vault app(s) settings.
- iii. Different internal and third part tools are used to measure how you interact with Watch Vault and our Services. Data collected in this regard is not limited to for example which items you like, which functions you use, who you follow, how frequently you sign in and log out for the Services. Data about the performance of our Services may be collected to detect crashes and other weaknesses or to measure what advertising you have been exposed to while using our Services.

3. How we use personal data

In order to provide you with the Watch Vault Products and Services you consent to our Terms of Service. We use data collected about you to honor our Terms of Service. Data about you is used to personalize and improve your user experience. Data is also used to communicate with you, for instance by providing support and information regarding our Services not limited to information about new products, new functionality, new services, updates, updates to Terms of Service, updates to these terms and your user account.

Watch Vault uses personal data for the following purposes:

a) Providing our Services

Watch Vault uses personal data to deliver the Services you have consented to expect from us. As an example, your name and email address are used to display your profile page and get in contact with you to provide support.

b) Improving our Services

Watch Vault use data in a continuous way for research and development purposes in order to improve our Services. Analytics of statistical data on large user segments enable us to understand how people use Watch Vault and grants insight to how we can further improve our Services. This involves using error reports to improve security and features of the clients, using search queries and clicks to improve the relevance of search results and applying usage data to determine what new features to prioritize.

Google Analytics and Google Analytics Advertising are used to understand the demographics of our user audience, in example the Age, Gender and Interests of our users. Data from Google Analytics and Google Analytics Advertising is completely anonymous. If you do not consent to share said data you can opt-out by using Google Analytics Opt-out Browser Add-on or refrain from using the Service.

The third parties include:

- Google Analytics – User insight
- Google Firebase: Real time database
- Google Firebase: Authentication
- Google Firebase: Storage
- Amazon Web Services: EC2
- Amazon Web Services: Amplify
- Mixpanel - User insight
- OneSignal - User insight
- Firebase (A Google product) - Crash and performance data
- Sentry - Crash and performance data
- AppsFlyer - Attribution and user insight
- CloudMailin

c) Communication

Personalized communication with you is based on the data we collect. At Watch Vault we use the data we collect to provide customer and user support. Communication not limited to responding to customer enquiries, diagnostics of technical issues or providing help for individual use cases requires the use of data.

Watch Vault may contact you via our Services, email, SMS, phone or other means of electronic communication, including through the Watch Vault app to inform you about new Watch Vault Services, support issues, surveys, security and software updates.

Watch Vault use information about you obtained from our Services to curate Watch Vault content and advertisements from our partners. This way you can be shown Watch Vault content adapted to you outside of the Watch Vault Services. However, Watch Vault does not share information that can identify you without your explicit consent.

Processing of said data is necessary for the performance of the agreement we have with you and our legitimate interest. If you do not want to receive direct marketing communications from Watch Vault you can opt-out by following the instructions sent in every such email or disable marketing communications in the Privacy settings for your user account with our Services. You can not opt-out from receiving communication related to changes in terms of service and policies, security updates or other critical information related to your Watch Vault account.

d) Customize Watch Vault to you and your interests

At Watch Vault we want to give you the best possible user experience. Therefore, Watch Vault Services are in place to customize and showcase relevant and interesting content based on our understanding of your interests, or trends in or around your location. You might experience that Watch Vault shows you listings or content similar to what you have previously liked, visited or searched.

e) A safe and trusted marketplace

Watch Vault highly regards the importance of having a safe and trusted marketplace. In order for you to feel safe buying or selling items to other users, Watch Vault will show some of your personal information on your Watch Vault profile and listings. Your name, username, profile picture and address can be shared with other users. You can select the granularity of your address when you browse and add items for sale. For the contractual agreement between a seller and a buyer of a specific item additional information such as full name and phone number can be shared between the involved parties, and the Watch Vault support administrators.

In order to keep the Watch Vault marketplace safe our Services are constantly monitored and evaluated. To avoid and reduce unwanted and criminal activity on the marketplace Watch Vault has put in place visible and hidden measures. As part of these measures Watch Vault stores and utilizes information including IP-addresses, email addresses, message history and other personal data collected. This data processing is necessary for the performance of the agreement we have with you and our legitimate interests.

Watch Vault uses cookies and similar technology for the purpose described above.

4. Disclosure of data

Watch Vault only disclose your personal data to third parties if you have expressly consented thereto, or there is a legal disclosure obligation, or disclosure is required in order to assert or defend against claims or exercise of legal rights and there are no grounds to assume that you have a prevailing legitimate interest in non-disclosure of your data.

However, Watch Vault may share non-personal information that is de-identified or aggregated in a way sufficiently securing the data to not be reasonably used to identify an individual. Such non-personal information may be disclosed publicly, to third-parties and partners.

a) External processing

Watch Vault uses third-party suppliers to perform parts of our Services, including credit card and bank account processing, shipping, communications and data storage. Watch Vault only share personal information necessary to perform our agreement with you as described in this Data Privacy Policy and our Terms of Use.

b) Legal reasons or to prevent harm

Watch Vault may disclose your data on the grounds of a legal request from competent bodies of government such as police, insurance or customs. The legal request will outline the specific data imposed to disclose. You will not be notified if such sharing occurs, unless the legal request explicitly requires us to disclose said sharing with you.

In case of a dispute, relevant information such as information about one of your listings and message history may be shared with the counterpart in the dispute or others.

c) Acquisition, sale or merger

Watch Vault may share your personal information in the event of an acquisition, merger or sale of all or a portion of our assets. Watch Vault will notify you via email, electronic communication and a noticeable announcement on the Services to inform you of your rights related to such an event.

d) Other companies

Watch Vault Products and Services may include links to Products, Services or applications of third parties whose privacy practices may differ from ours. If you provide personal data to third parties or their Products and Services, your data is governed by the third-party privacy statements. Watch Vault emphasize strongly that you read such privacy statements carefully.

5. Age restrictions

Watch Vault does not target nor intend to attract children under the age of 16. Parts of Watch Vault Services are available on the public domain to visitors of all ages, we do not want to request or collect personal data from those under the age of 16. In the case a non-competent minor has improperly registered a user account Watch Vault will immediately upon detection delete the user account and delete the adjoined personal data from our records.

6. Legal grounds for processing personal data

a) Contractual obligation

In order to perform the agreement between you and Watch Vault we may use your personal information

b) Our legitimate interest

Watch Vault may use your personal information for our legitimate interest. In order for us to use your personal information on the legal ground of legitimate interest we carefully choose the least intrusive methods regarding your privacy and data protection rights. Watch Vault relies on our legitimate interest to analyze and improve our Services, this process requires processing and analytics of some personal data. If you wish to exercise your right to object you can do so by contacting Watch Vault or by not using our services.

c) Legal obligation

Processing of personal data is necessary for compliance with laws and regulations on fraud and money laundering.

7. Data security

Watch Vault strive to keep your information safe and secure. To protect your data from accidental or intended manipulation or misuse there have been implemented several technical and organizational security measures. In order to protect the data security Watch Vault applies a combination of administrative, technical and physical controls. Transport Layer Security (TLS) is used to encrypt all communication packages to and from Watch Vault's servers. Personal data collected by Watch Vault is stored and processed in the EU and Norway, respectively. Third-parties such as Stripe may process your information in the United States.

8. Data retention

Watch Vault retains your personal information for as long as you maintain a customer relationship with us and as long as needed to comply with applicable laws, resolve disputes with any parties and otherwise as necessary to allow us to conduct our business. We do this as it is required for us to be able to deliver our services to you. All personal information we retain will be subject to this Data Privacy Policy and Watch Vault retention guidelines.

9. Deleting personal data

Watch Vault will store your personal information, listings, message history, likes and other information that you register as long as your user account is active.

Should you wish to delete your Watch Vault user account you can do so at any time. As an immediate action, your user profile will no longer be accessible on our Services. Watch Vault will keep your information for up to 120 days as this information may be required by government agencies or for resolving disputes. Listings created by an active user account are kept for up to 120 days when you delete them. Deleted listings will not be accessible by other user accounts. The deleted user account and associated information may also be washed for personal data and used for analytical purposes.

Please note that messages sent to other users will still be available for those users, even after your account has been deleted.

If an account has been involved in fraud or criminal activity, Watch Vault may store personal information about that account permanently in order to prevent the same person from accessing our Services at a later time. This data processing is based on our legitimate interest.

10. Your rights

You have the right to be in control of how your personal information is used by Watch Vault. This Data Privacy Policy details how Watch Vault collect, store, use and disclose personal information. You can exercise your rights by accepting our Terms of Service and this Policy or refrain from using our Services. In addition, you have the following rights:

- a) Information about the processing of your personal information.
- b) Demand a copy of the personal information Watch Vault holds about you in order to obtain access to data collected.
- c) Adjust or correct any change of your personal information directly within our Services or request assistance from Watch Vault to change your personal information.
- d) Demand that Watch Vault erases your personal information.
- e) Object to the processing of your personal information for marketing purposes or other particular situations.
- f) Request the restriction of the processing of your personal information in specific cases.
- g) Receive your personal information in a machine-readable format.
- h) Request that decisions based on automated processing concerning your personal information are made by natural persons, not only by computers. In this case you have the right to express your point of view and to contest the decision.
- i) In the case where Watch Vault processes your personal information with your consent you have the right to withdraw that consent at any time.
- j) In the case where Watch Vault processes your personal information on the basis of our legitimate interest you have the right to object to that use of your personal information at any time.

In order to exercise your rights, you must contact Watch Vault or the appropriate controller. Watch Vault will respond to your request without undue delay and the latest within 1 month. Watch Vault may require you to provide information to confirm your identity in order to exercise your rights. In the unlikely case where you are not able to exercise your rights or if Watch Vault is not complying with this Data Privacy Policy you have the right to file a complaint with the Data Protection Authority in your country. Datatilsynet is the competent authority for complaints on data privacy in Norway.