

Privacy Policy

0. Versioning and Effective date

Only the most recent version of this privacy policy applies. This declaration is version 1.7 which is valid from **20th February 2021**.

1. General information

We are happy that you would like to use our app 'vegan food alternatives' (hereinafter referred to as "app"). We are committed to the protection of your personal data and would like to inform you with this privacy policy about why and how we collect and process your personal data (hereinafter referred to as "data") as well as about your rights as an affected person. In the following, we use terms that are defined in article 4 of the EU General Data Protection Regulation (hereinafter referred to as "GDPR").

Personal data will be processed only in accordance with the regulations of the GDPR. We do not use your personal data for profiling or automated decision making.

Since our app was developed for the Apple iPhone resp. iOS only, we recommend that you read Apple's privacy terms:

- <https://www.apple.com/de/privacy/>
- <https://support.apple.com/de-de/HT208477>

If any aspects of our privacy policy are unclear to you, you can contact us at any time - you will find the contact details on our legal notice page.

The use of our app is completely voluntary - so we kindly ask you to not use the app if you do not agree with any of the terms of this privacy policy.

2. Context of data protection

This privacy policy applies to the use of our app 'vegan food alternatives'.

Therefore, this privacy statement does not apply to: The use of our websites or other products or services. Please consult the specific privacy policy of the respective product or service.

The subject of data protection, which is covered in this privacy policy, is personal data - in other words: All data relating to an identified or identifiable natural person (hereinafter referred to as "data subject").

Details can be found in section 5. of this privacy policy.

3. Data controller

Responsible for data protection matters in the context of the GDPR is:

Valentin Reck
Renzwiesen 15
70327 Stuttgart
Germany

valentin@veganalternativesapp.de

For further information on how to contact us, please refer to our legal notice page.

4. Legal basis

The relevant legal basis for the respective case of data processing is pointed out in section 5. of this privacy policy.

In general, the following shall apply:

- For data processing based on your explicit consent, the legal basis is article 6 paragraph 1 point (a) GDPR
- If data processing is necessary for the fulfillment of a contract with you or in order to take steps at your request prior to entering into a contract, the legal basis is article 6 paragraph 1 point (b) GDPR
- If data processing is necessary for compliance with a legal obligation to which the controller is subject, the legal basis is article 6 paragraph 1 point (c) GDPR

- If data processing is necessary for the purposes of our legitimate interests, the legal basis is article 6 paragraph 1 point (f) GDPR

5. What personal data we collect, why and how we do it (type, scope, purpose and specific legal basis)

5.1. Linking to our website

When tapping on "Vegan Background Knowledge" in the main menu of our app, you will be directed to a browser window for surfing on our website. As part of this linking, personal data (usually metadata, such as your IP address) is processed on our website.

For further information, please read the privacy policy of our website

www.veganalternativesapp.de

5.2. Linking to our Instagram profile ("vegan_food_alternatives")

Tapping "Find us on Instagram" in the main menu of our app will take you to our Instagram profile. Instagram is a social network provided and operated by Facebook Ireland Limited ("Facebook").

When you visit our Instagram profile, Facebook processes personal data, some of which is visible to us or some of which is only processed internally by Facebook. Personal data may also be processed outside the European Union.

We have divided the processed data into two subsections and describe them below:

5.2.1 Data that we can access

5.2.1.1 Messages

You can send us messages via Instagram. You do this always on a voluntary basis. The following information is accessible to us:

- Your message
- Any attachments to your message (pictures, videos, links, etc.)
- Your Instagram username
- Date of transmission
- Your online status ("active now", "active yesterday")

The retention period and legal basis described in the section "Contacting us by mail" also apply for Instagram messages.

5.2.1.2 Interacting with our Posts

We can see when you mark our posts with "Like", comment on our posts, view our stories or interact with them. You do this always on a voluntary basis. "Likes" and comments can be viewed by all Instagram users under disclosure of your username and can be undone or deleted by you. We have no control over whether and how you interact with our posts, nor do we have any influence on how Facebook treats the data it processes. Accordingly, the aforementioned processing activities do not fall within our area of responsibility. For further information, please see section 5.2.2 ("Further data processing by Facebook").

5.2.1.3 Instagram-Insights

Facebook provides us with "Instagram-Insights" analysis tools, with which we can view statistical usage evaluations in an anonymous form. This includes, for example, the reach, click and view numbers of our posts or demographic information about our followers. We can never relate this data to a specific person. However, we cannot determine whether Facebook itself could do this or whether the data within Facebook organization is anonymized. We have no influence on how Facebook handles this data. Accordingly, the aforementioned processing activities do not fall within our area of responsibility. For further information, please see section 5.2.2 ("Further data processing by Facebook").

We use Instagram-Insights because of our legitimate interest in optimizing our posts and their design (article 6 paragraph 1 point (f) GDPR).

You can find further information here:

https://www.facebook.com/legal/terms/page_controller_addendum

5.2.2 Further data processing by Facebook

In addition to the data processing activities described above, Facebook processes further personal data.

Since Facebook is solely responsible for these processing activities and we have no influence on these processing activities, please familiarize yourself with the privacy policy of Instagram or Facebook before visiting our Instagram profile:

- Privacy Policy
 - <https://www.facebook.com/policy>
 - https://help.instagram.com/519522125107875?helpref=page_content
- Contact the Instagram Privacy Officer:
<https://help.instagram.com/contact/186020218683230>

Facebook also sets cookies when using Instagram. You can view the corresponding cookie policy here: <https://www.facebook.com/policies/cookies/>

5.3. Forwarding to web search engine providers

If you tap "Search this online" for a vegan alternative suggestion, the title of the suggestion (e.g. "Oat Drink") is passed to the web search engine provider (e.g. Google Web Search, Bing, Yahoo Web Search, DuckDuckGo) you selected in iOS preferences and a web search is started in your iOS browser. The search engine provider will only receive the title of the alternative suggestion from us. No personal data will be transferred from us to the search engine provider. As soon as the web search has been started in your browser using the respective search engine provider, personal data is usually processed automatically by the respective search engine provider - however, this is beyond our control. Please read and take note of the privacy policy of the search engine provider you have chosen, for example:

- Google: <https://policies.google.com/privacy>
- Bing: <https://account.microsoft.com/account/privacy?refd=www.bing.com&destrt=privacy-dashboard&lang=en-GB>
- Yahoo: <https://www.verizonmedia.com/policies/ie/en/verizonmedia/privacy/products/searchservices/index.html>
- DuckDuckGo: <https://duckduckgo.com/privacy>

5.4. Reference to the Apple App Store

The "View in App Store" function allows you to view our app in the Apple App Store, for example to rate it. For this purpose, the app uses only iOS system functions provided by Apple.

Please note that any data processing that takes place within the scope of the "View in App Store" function is not within our sphere of influence.

Please consult Apple's applicable privacy policy prior to use, for example:

- <https://www.apple.com/de/privacy/>

5.5. Contacting us by mail

We would like to offer you the option to get in contact with us, e.g. in order to submit feedback to us, address enquiries to us or to request information from us. It is entirely voluntary and up to you to contact us.

If you contact us by e-mail, the following data will be transmitted to us and stored:

- Your message
- Any attachments attached to your mail
- Your sender address
- Technically required metadata attached to the mail (for example, date, your name, mail subject, technical details,...)

These information are collected for the processing of your request and potential subsequent enquiries. Depending on the context and content of your message, the legal basis for this is:

- Fulfillment of contract - according to article 6 paragraph 1 point (b) GDPR
- Our legitimate interest, which is the possibility of fast and direct communication - e.g. to discuss improvement measures, to answer support inquiries or to share important information with you. (article 6 paragraph 1 point (f) GDPR)

The above data will be deleted by us no later than 30 days after the final completion of your request. Beyond that, we reserve the right to further use gained customer feedback in an anonymised way.

The data subjects affected by this data processing are those who contact us by e-mail.

We do not use the contact data obtained in this way for other purposes, such as direct advertising.

5.6. App-Analytics with Flurry Analytics

For the purpose of product improvement, we would like to get to know your user behaviour within the app better by, for example, collecting and analysing interaction events, important device settings and other status information ("app analytics"). For this purpose, we use Flurry Analytics, an analytics service for smartphone apps provided by Verizon Media EMEA Ltd (5-7 Point Square, North Wall Quay, Dublin 1, Ireland; hereinafter "Verizon Media").

For more information on privacy with Flurry Analytics, please visit:

- <https://www.verizonmedia.com/policies/ie/en/verizonmedia/privacy/index.html>

Scope

As part of using app analytics, Verizon Media will, for example, collect, process, aggregate and analyse the following information on our behalf on a pseudonymous basis:

- Interaction events within the app, for example
 - Opening a screen within the app and time spent on the screen
 - Triggering a function within the app (e.g. opening a substitute product, opening a recipe, buying the full version, tapping a button, ...)
 - Approximate count of interaction events and approximate time passed between app installation and an interaction event
- Important device settings of your smartphone, for example
 - Country
 - Language
- Other data collected automatically by Flurry Analytics, for example
 - Crash Reports
 - IP Address
 - Approximate geographic region
 - Carrier
 - App version
 - Count of session
 - Duration of sessions
 - Operating system
 - Device model
 - In-App purchases
 - "Identifier for Vendors"; IDFV (randomly generated installation ID to associate Analytics data with your app installation)

The information collected is transferred to Verizon Media, stored and used, for example, to analyse usage behaviour within our app, generate interactive reports about it and provide other related services to us in the context of app analytics.

We use Flurry Analytics due to our legitimate interest in better understanding our customers and improving the app and its design in a customer-centric way. The legal basis for this is article 6 paragraph 1 point (f) GDPR.

Objection

Of course, the app analytics function of the app is deactivated by default - you are completely free to support us by activating the app analytics function. You do not have to activate app analytics and you can deactivate / object to the use of app analytics at any time in the main menu under "Privacy".

Deletion

You can contact us at any time with your Installation ID (IDFV) and request the deletion of the app analytics data collected for this ID. You can find the Installation ID in the main menu under "Privacy".

Access

You can contact us at any time with your Installation ID (IDFV) and request a copy of the app analytics data collected for this ID. You can find the Installation ID in the main menu under "Privacy".

You can also do this on your own by using the "Analytics Privacy Dashboard" of Flurry Analytics. You will find the function in the main menu under "Privacy".

6. General retention period of personal data

In general, the retention period of personal data for the respective case of data processing is pointed out in section 5. of this privacy policy.

Unless specific information on the retention period is provided in section 5, the following shall apply:

We only store your personal data for as long as we need it to fulfill the respective purpose of the processing. Other legal requirements (e.g. tax or commercial law storage obligations), which require longer retention periods, remain unaffected.

7. Deletion of personal data

In general, we delete your personal data when the purpose of retaining or processing the data no longer applies or you exercise your right to deletion (see section 9.4) and there is no legal requirement to the contrary (e.g. tax or commercial law requirements to keep records).

Since we - especially with metadata - often cannot relate data to other personal, identifying data (such as your name, address, etc.), we may be dependent on your cooperation and the provision of further information by you in order to delete specific data records. This may require you to identify yourself to us.

8. Unveiling of personal information

In general, we only disclose personal data to those recipients who require access to fulfill the respective purpose of data processing.

- Within our organisation these are for example:
 - Entities that are involved in contract and accounting tasks
 - Entities that are in contact with customers
 - Entities that are responsible for technical problems or abusive use of our infrastructure
- Outside our organisation, these are for example:
 - Entities which are required to receive personal data for legal reasons (e.g. tax authorities)
 - External data processors (see below)

External data processors

We use the services of the following external data processors, to whom data is disclosed or transmitted respectively:

- Serverprofis GmbH, Mondstraße 2-4, D-85622 Feldkirchen, Germany
 - In particular, we use the following services: Provision of application/web servers, mailing services, database servers, storage capacities, domain and infrastructure services and security services.
 - The following links will take you to the privacy policies of Serverprofis GmbH: <https://www.serverprofis.de/datenschutz/>

We have a data processing agreement with the above-mentioned contract data processors, which obliges the contract processors to comply with appropriate data protection requirements and levels.

Making use of the above third party services is based on our legitimate interest in providing modern, highly available and secure online services. The legal basis for this is article 6 paragraph 1 point (f) GDPR.

9. Your rights as a data subject

In the following we inform you about your rights as a data subject:

9.1. Right of access

In accordance with article 15 GDPR, you have the right to obtain information on whether we process personal data relating to you. If this is the case, you have the right to obtain information about this data, a copy of the data and further detailed information (see article 15 GDPR) on the data.

9.2. Right to rectification

In accordance with article 16 GDPR, you have the right to demand that we correct or update incorrect personal data.

9.3. Right to completion

In accordance with article 16 GDPR, you have the right to demand that we complete incomplete personal data.

9.4. Right to deletion

In accordance with article 17 GDPR, you have the right to demand that we delete your personal data, if the legal requirements are fulfilled (see article 17 GDPR) and there is

no other legal requirement to the contrary. Please note that we may also be obliged to delete personal data in other cases in accordance with article 17 GDPR.

9.5. Right to restrict processing

In accordance with article 18 GDPR, you have the right to demand that we restrict the processing of your personal data, if the legal requirements are fulfilled (see article 18 GDPR) and there is no legal requirement to the contrary.

9.6. Right to data portability

In accordance with article 20 GDPR, you have the right to demand that we provide you with a copy of your personal data in a structured, common and machine-readable format and to transfer this data to other data controllers, provided that the legal requirements are fulfilled (see article 20 GDPR).

9.7. Right to object

In accordance with article 21 GDPR, you have the right, on grounds relating to your particular situation, to object at any time to the processing of your personal data which is legally based on article 6 paragraph 1 point (f) GDPR. This also applies to profiling based on these provisions.

We will stop processing your personal data in the event of an objection, unless we can prove compelling legitimate grounds for processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

You have the right to object at any time to processing of your personal data for the purpose of direct marketing. This also applies to profiling that it is related to such direct marketing. If you object to the processing of personal data for direct marketing purposes, your personal data will no longer be processed for those purposes.

9.8. Withdrawal of a given consent

In accordance with article 7 paragraph 3 GDPR, you have the right to withdraw your given consent to the processing of personal data with effect for the future. This does not affect the legality of the processing operations carried out up to the point of withdrawal.

9.9. Right to lodge a complaint with a supervisory authority

If you think that certain aspects of processing of your personal data violate the provisions of the GDPR, you have (in accordance with article 77 of the GDPR), the right to lodge a

complaint with a supervisory authority - in particular in the Member State of your habitual residence, your place of work or the place where the alleged breach occurred.