

TOMAPPO PRIVACY POLICY AND COOKIES POLICY

The web and mobile application Tomappo ("Application"), our websites, and other services are brought to you by PROVENTUS d.o.o. ("PROVENTUS") a company with a primary business address of Franca Baliča 32, 5290 Šempeter pri Gorici, Slovenia, EU.

This Privacy Policy contains information about the collection of personal data, its processing and usage. We receive your personal information through a variety of means including our mobile app Tomappo and our websites (www.tomappo.com / www.tomappo.it / www.tomappo.de / www.posadi.si) with all their subdomains. Collectively we call these our "Services". In case you do not agree with the data practices described in this Privacy Policy or [Cookies Policy](#), you should not use our Services.

We intend only to process personal data fairly and transparently as required by data protection law including the General Data Protection Regulation (GDPR).

What data we collect and how do we collect it

User Provided Information

Through Mobile Application Tomappo we collect the information you provide when you download and register the Application. Registration is optional but you may not be able to use some of the features such as weather forecast, asking questions on our gardening forum, secure storage of your gardening notes in Cloud, etc., unless you register with us. Through Web Application Garden Planner (PRO) we collect the information you provide after your registration. You cannot use the Garden Planner (PRO) without registration. When you register with us and use the Application, you generally provide:

- (a) Your name, email address, password and other registration information;
- (b) Transaction-related information, such as when you make purchases, respond to any offers, or download or use applications from us;
- (c) Information you enter into our system when using the Application, such as the design of your garden and your gardening notes;
- (d) Your location - only when you provide it (When you use our Services, we collect and process information about your specific location. For the app to know your location you will be asked to give your consent to this when joining and from time to time during your use of the Services. Knowing your location helps us improve the Services including offering location specific plant tasks, weather information, planting recommendations and plants for sale in our price comparison. We may also share an aggregated and anonymised approximation of your location with our partners.);
- (e) Information provided when you log-in to the Application via Facebook (name, public profile, e-mail) or any other social media site (you should review the privacy policy of Facebook or any other social media site through which you choose to log into our certain services);
- (f) Your address and/or phone number - only when you provide it for purchase or seed-exchange purposes.

Automatically Collected Information

In addition, the Application collects certain information automatically, including, but not limited to, the type of mobile device you use, your mobile device's unique device ID, the IP address

of your mobile device, your mobile operating system, the type of Internet browsers you use, and information about the way you use the Application.

We also use standard Internet technology, such as web beacons, cookies and other similar technologies, to track your use of our Services (see our [Cookies Policy](#)). Web beacons are small pieces of data that are embedded in images on the pages of sites.

This allows us to assess how you have used our services and helps us to analyse how we can optimize them for you in the future. Please note, if you do not allow us to collect information from you it may result in you being unable to use certain features including purchase products or services and participate in a contest, promotion, survey, or sweepstakes. For further information about our use of these technologies and how you can opt out of cookies, please see our [Cookies Policy](#).

How We Use Your Data

We gather data to:

- provide and deliver the products and services on your request, process transactions, and send you related information;
- provide weather forecast for your garden and location specific offers;
- develop and improve products and services;
- provide customer support and to communicate with you by e-mail, postal mail, display media and/or mobile devices about products or services that may be of interest to you either from us, or our business partners;
- send you updates, technical notices, security alerts and marketing communications on behalf of us or other companies;
- monitor and analyse trends and usage;
- perform scientific research on anonymised data regarding gardening, nutrition and lifestyle.

When our company processes your order, it may send your data to, and also use the resulting information from, credit reference agencies to prevent fraudulent purchases.

How We Share Information

Except as otherwise stated in this Privacy Policy, we do not disclose to or share your personal Information with third parties, unless you ask or authorize us to do so. We may disclose User Provided and Automatically Collected Information:

- to comply with any law, regulation, or governmental request, or to comply with judicial process;
- to protect and defend the rights or property of us, the users of our Services, or third parties;
- with our trusted service providers that perform certain services on our behalf such as e-mail services, billing and payment processing, services supporting contests, sweepstakes and surveys;
- to research institutions and aggregators of research data in anonymised form for purposes of scientific research related to gardening, nutrition and lifestyle;
- in the event PROVENTUS goes through a business transition such as a merger, acquisition by another company, or sale of all or a portion of its assets, your Personal Information will likely be among the assets transferred. You acknowledge that such

transfers may occur, and that any acquirer of PROVENTUS or its assets may continue to use your Personal Information as set forth in this Privacy Policy;

- to advertisers and third party advertising networks and analytics companies as described in the section below.

Data Analytics and Advertising

We may work with analytics companies to help us understand how our Services are being used. We may work with advertisers and third party advertising networks who need to know how you interact with advertising provided in the Application, which helps us keep the cost of the Application low. Advertisers and advertising networks use some of the information collected by the Application, including, but not limited to, unique device identifiers, device manufacturer and operating system, IP address, browser type, pages viewed, session start/stop time, links clicked, and conversion information. You can stop all collection of information by the Application easily by uninstalling the Application.

We may send you information about products and services we think you might like. You may always opt out by unsubscribing from mailing lists. To unsubscribe from our emails and service you can use the unsubscribe link at the bottom of any email our system sends out.

Privacy policies of third-party websites

Our Privacy policy applies only to our Services. There may be places in our Services where you may click on a link to access other websites that do not operate under this Privacy Policy. For example, if you click on an advertisement, you may be taken to a website that we do not control. These third-party websites may independently solicit and collect information from you and, in some instances, provide us with information about your activities on those websites. We recommend that you consult the privacy policy of all third-party websites you visit.

Legal Grounds

To process your personal data, we rely on certain legal grounds, depending on how you interact with our Sites and Applications (our Services).

When you purchase products from our Sites, we need your personal data to fulfil our contract with you. For example, we need your payment and contact details to deliver your order.

When you use our Applications, we rely on your consent for processing and for certain limited purposes to fulfil our contract with you.

We also rely on other legal grounds, such as our legitimate interests as a business, to comply with a legal obligation, or to protect your vital interests.

Your rights

Depending on your location, you may have some or all of the following rights in relation to how we use your information:

1. The right to access - you may ask of what kind of personal data is being processed and receive copies of it;
2. The right to data portability - you may ask to get a structured record of the data we have on you and the right to transfer that record to another organization;
3. The right to rectification - you may ask for modifications in case personal data is not up to date, accurate or complete.

4. The right to Object to, Limit or Restrict the use of your Information - you may ask us to stop using all or some of your information or to limit our use of it.
5. The right to erasure - in certain circumstances, you can request a right to be forgotten - to have your information deleted. We will honour such requests unless we have to retain this information to comply with a legal obligation or unless we have an overriding interest to retain it.
6. Consent Withdrawal - where we rely on consent to process your information, you may withdraw a previously given consent at any time.

If you wish to exercise any of these rights, or wish to object to our use of your information, please write to us at our email: info@tomappo.com.

Should you believe that your rights related to the processing of your personal data have been infringed, you may lodge a complaint with the Information Commissioner's office (Zaloška 59, 1000 Ljubljana, e-mail: gp.ip@ip-rs.si). In any event, in order to resolve any privacy issue as quickly and conveniently as possible, it is advisable that you send any complaints or enquiries to PROVENTUS at the above email address prior to addressing the authorities.

Security

We are concerned about safeguarding the confidentiality of your information. We provide physical, electronic, and procedural safeguards to protect information we process and maintain. Sensitive information such as credit card details are not stored on our own servers but passed directly to our secure payment provider. The servers that store personally identifiable information are in a secure environment.

The collected data is stored on a virtual server within EU. The security of the infrastructure is guaranteed by the (established) cloud provider while the system itself complies with current security best practices (encryption of passwords, secure communication etc.).

Information we collect, or permit third parties to collect may be transferred to, stored and processed outside your country of residence in any country or territory where one or more of our affiliated group companies, third party service providers or advertising companies or advertising networks are located or maintain facilities, including but not limited to Slovenia.

Data Retention Policy, Managing Your Information

We will retain User Provided Data for as long as you use the Application and for a reasonable time thereafter. We will retain Automatically Collected information for up to 24 months and thereafter may store it in aggregate. If you would like us to delete User Provided Data that you have provided via the Application, please contact us at info@tomappo.com.

Changes to our Privacy Policy

We reserve the right to modify this statement at any time, therefore we ask you to review it frequently. If we make material changes to this policy, we will notify you here, by email, or by means of a notice on our home page.

Contact Us

If you have any questions or suggestions regarding our Privacy Policy, please contact us by sending an e-mail to info@tomappo.com.

COOKIES POLICY

About cookies

This cookie policy explains what cookies are, why and how we use cookies as well as your rights to control our use of them.

Cookies are small pieces of text sent by your web browser by a website you visit. A cookie file is stored in your web browser and allows the Service or a third party to recognize you and make your next visit easier and the Service more useful to you.

Cookies can be "persistent" or "session" cookies. A persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

If you continue to use our Services, you agree to the use of cookies as here described.

How we use cookies

We use cookies to store and collect information about the usage of our website Services. On the webpage, we cannot tie any information directly to you. We see the number and the flow of users on the pages, we see what browser and the operating systems (e.g. Windows or Mac OS) they are using, what platform they came from and the location (city). If you register for the newsletter, we see your email address, we see if you have opened the link, and which links in the email you have clicked on. All of this helps us improve our Services.

Cookies that we use

We use cookies for the following purposes:

- A. Authentication - we use cookies to identify you when you visit our website and as you navigate our website. Cookies used for this purpose are: authdata, connect.sid, userSession;
- B. Analysis - we use cookies to help us to analyse the use and performance of our website and services. Cookies used for this purpose are: _ga, _gid, _gat, _hjid, _hjIncludedInSample, _gat_gtag_[ID of website], tk_or, tk_r3d, tk_lr, _fbp, fr;
- C. Wish list - we use cookies to maintain the state of your wish list as you navigate our website. Cookies used for this purpose are: yith_wcwl_session_.

Managing cookies

If you do not wish to accept cookies in connection with our website Services, you will need to delete, and block or disable cookies via your browser settings. For details, visit your browser's help menu. If you choose to reject cookies, you may still use our website though your access to some functionality and areas of our website may be restricted.

Contact us

If you have any questions about our cookies or this cookies policy, please contact us by email to info@tomappo.com.