HUP Privacy policy

HUP my-buddy-app

Privacy policy

HUP my-buddy-app takes the private character of your personal data very seriously. In our privacy policy we describe how we handle your information when you install and use HUP my-buddy-app on your devices and inform you about your rights resulting from the privacy policy. Our privacy policy is regularly reviewed by us and, if extensions / changes to our HUP my-buddy-app or the current legal requirements require it, it will be updated.

Please read our privacy policy carefully. By installing and using our HUP my-buddy-app on your device you accept and agree to our terms of use as well as the terms of this privacy policy. If you do not agree with the conditions, do not use our app. You can remove it from your device at any time.

With regard to the terms used, such as "data subject" or "processor", we refer to the definitions in Article 4 REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL (GDPR). These can be found at: https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679&from=DE

Who is the provider of HUP my-buddy-app and responsible for the processing of data?
You can contact us, the HUP GmbH, as provider of HUP my-buddy-app and as the controller responsible for compliance with data protection rules and safeguarding the rights of data subjects specified in the GDPR as well as other data protection laws valid in the member states of the EU and other regulations with data protection character for HUP my-buddy-app, at any time.
For this purpose you can reach us by mail, phone or e-mail as follows:

HUP GmbH
Am Alten Bahnhof 4 B
38122 Braunschweig
Germany
Tel.: 0531 281 81-0
E-Mail: info@hup.de

Furthermore, you can contact our data protection officer at any time by e-mail to datenschutz@hup.de.

What security measures have we taken?
We endeavour to protect personal data by appropriate technical and organisational measures, which are based on the type of personal data and the applicable processing activities. We do not knowingly collect or process personal data from persons under the age of 18. If you are under 18 years of age, we ask you not to install or use our app. If you believe that a young person under 18 has provided us with personal information, please contact us at datenschutz@hup.de . We will then take immediate action.

What are your rights as a data subject?

You, as the data subject, have the **right** to complain to the supervisory authority responsible for us in accordance with Art. 77 of the GDPR if you believe that we are processing your personal data unlawfully.

To this end, you can contact the Data Protection Officer of Lower Saxony as follows:

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Barbara Thiel
Prinzenstrasse 5
30159 Hannover
Germany
Phone: +49 (0511) 120 45 00
Fax: + 49 (0511) 120 45 99
E-Mail: poststelle@lfd.niedersachsen.de

Right of objection and revocation
You can object at any time to the future processing of your personal data in accordance with Article 21 of the GDPR. Furthermore, you have the right to revoke any consent you have already given us in accordance with Article 7 paragraph 3 of the GDPR with effect for the future. The means by which you can control your right of objection and revocation yourself are explained further below in this data protection declaration.

Further information
If you have any further questions regarding data protection or the data we have stored about you, please contact us using the options given in the imprint or by e-mail to our data protection officer at datenschutz@hup.de. In. We are happy to fulfil your standardised right to information (Art. 15 GDPR). Your rights include:

- Right of rectification in the event that the data collected is incorrect (Art. 6 GDPR),
- Right to immediate deletion of personal data concerning you, unless legally binding storage periods prevent deletion (Art. 17 GDPR),
- Restriction of data processing if your data may not yet be deleted due to legally binding storage periods (Art. 18 GDPR),
- Right to data transferability, i.e. the provision of the personal data stored by us in a structured, common and machine-readable format with the right to transfer this data to a third party (Art. 20 GDPR).

What personal data and data sources are collected?
We use and process your personal data if you have provided us with such information directly and voluntarily or if we have received it through our business partners or service providers or if it is automatically collected in connection with your use of our services. The prerequisite for this is that this data is relevant for the fulfilment of our services, contractual obligations and services.

In the current version of HUP my-buddy-app we receive the following personal data from you:

- Mac addresses
- Device information / identifiers
- Location data
- Log/Log files

For what purposes do we use your data?
The data collected and processed by HUP my-buddy-app are used and required exclusively for the use and functionality of the app itself. Your data will not be used in any other way in the current version of the app, nor in future expansion stages of the app. If the reason for storage ceases to apply or if a storage period prescribed by the European Directive and Regulation Giver or any other competent legislator expires, your personal data will be blocked routinely and in accordance with the legal provisions and deleted in compliance with the tax and commercial law regulations.

Lawfulness of processing

We only process your data if we have a legal basis for doing so. Legitimate grounds include

- your consent (Article 6(1)(a))
- the fulfilment of our existing contractual obligations with you, laid down in our terms of use, in accordance with Art. 6 Para. 1 lit. b GDPR,
- our legitimate interest under Art. 6 para. 1 lit. f GDPR in marketing our products and services and providing our customer support.

By voluntarily and actively installing HUP my-buddy-app on your iPhone/iPad/apple-watch as well as the access rights you have voluntarily granted, you have accepted our terms of use and have given us your consent for the necessary processing of your data by our app.

What kind of processing is done by HUP my-buddy-app?

What is the HUP my-buddy-app?

With the help of our HUP my-buddy-app we provide you with a mobile app that makes sure that you carry the things that are important to you, such as your smartphone, your tablet, your wallet or your keys, with you on business trips or in everyday life. This is done using Bluetooth Low Energy Beacons. In the current version HUP my-buddy-app only supports the Bluetooth Low Energy iBeacon - standard of Apple Inc. and therefore protects all Bluetooth Low Energy capable iOS devices.

HUP my-buddy-app detects the location of your devices/items to be protected, determines their approximate distance, notifies you by vibration and a visual alert via your Apple Watch within 60 seconds after a certain distance or if you lose your connection and offers you the possibility to navigate to the last saved location of this device.

After installation and configuration of your HUP my-buddy-app on your iPhone/iPad/Apple-Watch it can approximately determine the distance to the connected iBeacons (and therefore to your devices, keys, wallets linked/equipped with the iBeacons) by evaluating the data of the connected iBeacons received via the Bluetooth connection of your device - without you having to open the HUP my-buddy-app permanently or having activated your online connection. After a certain distance or if a device loses its connection, HUP my-buddy-app notifies you within 60 seconds by means of vibration and a visual indication on your Apple-Watch / your iPhone / your iPad and offers you the possibility to navigate to the last saved location of this device, if you have given the appropriate permission.

The current version of HUP my-buddy-app does not require an internet connection after the first installation on your device. Only the location of your mobile device should be enabled and the Bluetooth connection must be switched on.

What data is processed during the installation of the app?
HUP my-buddy-app is available to you as Apple user via the App Store of Apple Inc. When you download our App from the Apple Store of Apple Inc., the necessary information, such as the customer number of your Apple account, is transferred from the device from which you access the Apple Store to Apple Inc. We cannot influence the data collection by Apple Inc. and are not responsible for it. We process the data provided only to the extent necessary for the download of our app. Furthermore, we do not store this information.

For more information, please refer to the Privacy Policy https://www.apple.com/legal/privacy/en-ww/ and the Privacy Policy https://www.apple.com/privacy/ of Apple Inc.

What are iBeacons and how do they work?

Apple's Bluetooth Low Energy Beacon, the iBeacon, is a small battery-powered device that continuously sends a signal via Bluetooth with consistent information to uniquely identify the iBeacon. An iBeacon usually transmits four pieces of information configured by Apple, which cannot be changed by us:

- the UUID (universally unique identifier) - a multi-character string.
- two numerical values Major and Minor. These numerical sequences are also configured by Apple and can be used to form groups or subgroups
- Indicator for the transmission power of the beacon.

When the iBeacon is placed in a specific location, for example in your wallet, the Beacon ID (the unique combination of UUID and the numerical values Major and Minor) and transmit power are continuously sent via Bluetooth LE. The range here is approx. 25 to 50 m. The iBeacon has no other functions, it can neither receive data nor connect to other Bluetooth devices.

The transmitted signal can be received by the iPhone/iPad (factory default) via its Bluetooth connection. This enables your smartphone/tablet to detect which iBeacon is in its vicinity.

Does iBeacon information qualify as personal information?

Even if the collected data is only stored locally on your device, we would like to point out here that the iBeacon information is personal data at the moment it is received by your iPhone, even if no information is passed on from your device by HUP my-buddy-app. A conclusion about you as a person or the smartphone owner would only be possible if third parties get knowledge of the iBeacon IDs received from your iPhone and at the same time know the meaning of the individual iBeacons as well as the iPhone owner himself. To prevent this, it is the responsibility of the smartphone / operating system manufacturers, i.e. the responsibility of Apple Inc. For further information, please refer to the company website (https://www.apple.com/) or contact Apple Inc. directly. The mailing address is Apple Inc., One Apple Park Way, Cupertino, CA 95014, U.S.A.

What kind of data is collected during registration?
In the current version of HUP my-buddy-app no registration is required. However, we reserve the right to extend future versions by an appropriate registration.

What access rights are required?
After you have downloaded the HUP my-buddy-app to your iPhone or iPad, you will be asked to enter the following rights and information in the app's settings:

- Location services - Location release
  The location release is optional. It is required to display and navigate to your GPS location if a device loses connection. If you want this functionality, you have to enable the location services for the app. You can enable and disable the location services in the settings of the HUP my-buddy-app and thus the enabling of your location or the location of your connected devices at any time.
- Bluetooth activation
  The connection between the individual devices only works if the Bluetooth interface of your devices to be connected is activated.
  You can turn the Bluetooth connection of your device on and off at any time. However, we would like to point out that you cannot use the HUP my-buddy-app without enabling your Bluetooth connection.
- Approval of Apple notifications (notifications)
  Without the approval / approval of the notifications it is not possible to display this disconnection on the Apple Watch in case of loss. I.e. HUP my-buddy-app does not work without approval of the Apple notifications.
  You can revoke the approval of the notifications in the settings of HUP my-buddy-app at any time.
- Usage data
  In the current version, usage data only includes the data required for the provision of functionality. Beyond this, no further logging / logging takes place. However, we reserve the right to change the functional range in further versions of HUP my-budd-app accordingly.

- Configuration data
  Selection / specification of the Bluetooth Low Energy devices to be protected / controlled such as iPhones, MacBooks, the Apple Watch, Tablets and other Bluetooth Low Energy iBeacons (up to 20 devices).
  In the settings of the HUP my-buddy-app you can control at any time which devices should be monitored or not.
- Specifying the desired notifications for each specified device
  When sharing Apple notifications (see above), you can specify permissions for each connected device. These are so-called "local notifications", which are created locally on the device itself, held in the system and triggered and are therefore not used by servers. You can remove or set them in the HUP my-buddy-app settings at any time.

What should be taken into account when releasing a site?

You can control the use of location services specifically for your HUP my-buddy-app via the settings of the HUP my-buddy-app without the settings made here affecting other apps installed on your device.

Please note, however, that the enable/disable of the tracking services only applies to the HUP my-buddy-app and that your location will not be forwarded by the HUP my-buddy-app.

The enable/disable of the tracking services for the system services on your device is also not affected by this. You have to configure these separately in the system settings of your device.

Please also note that your mobile devices, especially if they are connected to the mobile network, constantly collect and evaluate location data in order to be able to send you calls, SMS or other data. Also, tablests connected to the Internet via WLAN often forward their location to other servers and services. We cannot influence this and are not responsible for this transmission. For further information, please contact your mobile operator and Apple Inc.

What kind of data is collected and processed when using the app?

For each device configured accordingly in the settings HUP my-buddy-app logs the following information with each change of the connection type:

- Device information
  - Device names,
  - UUID,
- Indicates whether the machine is allowed to send notifications,
- Indicates whether the device is an Apple-Watch. This is necessary because, depending on the version, the Apple-Watch can only connect to the iPhone and no other device.
- Time of logging or connection change
- Type of connection change
  - Connection established (connected)
  - Connection is established (connecting)
  - Connection is disconnected (disconnecting)
  - Connection is disconnected
- GPS coordinate, provided that the connection is disconnected and the location has been cleared

A notification is triggered if no further connection change with status "connected" is received within 30 to 45 seconds after the connection is lost.

You can change the authorisations you have granted with immediate effect at any time in the settings.

Where is the collected data stored and for what period of time?

All collected and recorded data will be saved in the current version of HUP my-buddy-app locally on your device (iPhone/iPad/Apple-Watch). This applies to the shares, authorisations and connected devices stored in the settings as well as to the connection data per device logged by the HUP my-buddy-app.

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The settings and configuration information you have made will remain stored on the device as long as you use HUP my-buddy-app on the device or until you uninstall the app from the device.

The data collected during operation to log and control notifications in the event of a loss of connection is stored locally on your device for a period of 24 hours and then deleted.

What kind of usage data is used for analysis purposes?
In the current version no data for analysis purposes are transmitted from Smartphone, MaxBook, Apple-Watch or Tablet by the HUP my-buddy-app.
However, we reserve the right to transfer so-called developer logs for future analyses. However, the transfer of these log files, which may contain GPS coordinates and device names under certain circumstances, will only take place if you as a user have explicitly set the option "Share analysis data" in the settings and have thus given us your consent and agreement for this transfer. This consent can be revoked and terminated at any time with effect for the future by removing the "Share analysis data" option.

Which cookies are used?
HUP my-buddy-app does not use any cookies.

What information is passed on to third parties?
In the current version of the HUP my-buddy-app all collected and recorded data is stored locally on your iPhone/iPad/etc., a connection to the internet is not currently required.
This means that at no time will data from your device be passed on to us, as provider of the app, or to other third parties. It is not possible to draw any conclusions about you as a person or smartphone owner or, if you have released it, about your location. However, we reserve the right to pass on data via an appropriate internet connection for future product enhancements, such as a required registration.

What information do we, as an app provider, receive for analysis purposes from Apple Inc.
If you have enabled the option "share data with app developers" in the system settings of your iPhone/MaxBook/iTabs/Apple-Watch, we will receive information from Apple Inc. about possible system errors as well as data and statistics about your use of our HUP my-buddy-app. This information is usually anonymised so that no conclusions can be drawn about you as the person concerned. In individual cases, however, it cannot be ruled out one hundred percent that we will become aware of your personal location data in the course of forwarding system errors in the memory image of your device sent by Apple Inc. to the App Developer. We will not further process or forward this personal information. The data transmitted by Apple Inc. will be deleted by us after error analysis and initiation of appropriate optimisation measures.

You can allow or prevent the forwarding of data to us for app analysis and optimisation purposes at any time in the settings of your iOS device. For further details, please refer to the settings of your device (Settings - Privacy - Analysis) as well as the data protection regulations of Apple Inc. at https://www.apple.com/privacy.

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Categories of personal data

- Mac addresses
- Device information / identifiers including connection data
- Location data
- Usage data

Categories of data subjects

- all active HUP my-buddy-app users from 16 years on

Categories of recipients

- no forwarding of data by the HUP my-buddy-app

Revocation of your consent and consents:

- *By deactivating your Bluetooth connection as well as the access to your location in the settings of your iPhone/iPad/Apple-Watch or in the app settings of your HUP my-buddy-app you can decide at any time whether you want to continue to actively use the app, its notifications and the location of your iBeacon discoverable devices/items.*

- *Furthermore you can delete HUP my-buddy-app from your iPhone/iPad/Apple-Watch at any time and stop the use of the app itself as well as the iBeacon technology and the location of your connected devices. iOS supports iBeacons ex works but uses a so-called opt-in model. This means that you only become a user of this functionality when you install an iBeacon app, such as HUP my-buddy-app*
  .
- *You can revoke your granted access rights and consent with immediate effect or grant new ones at any time in the settings of HUP my-buddy-app.*
  This concerns:
    - *Remove / add individual devices*
    - *Remove all connected devices*
    - *Allow or block notifications from the app*
    - *Allow or block notifications for individual devices*
    - *Enable or disable your location*
    - *Enable or disable your Bluetooth connection*

- *At any time you can revoke your permission to transfer information about system errors and statistics about your use of the HUP my-buddy-app with immediate effect in the settings of your Apple device.*