

ROUTO PRIVACY POLICY

Effective Date: 27 June 2025

Last Updated: 27 June 2025

This Privacy Policy ("**Policy**") describes how **Illarion Khliestov, conducting business under the brand name "Routo,"** with business address **Al. Jana Pawła II 65/120, 01-038 Warsaw, Poland, NIP 521 399 66 29, REGON 523 914 382** ("Routo", "we", "us", "our") collects, uses, stores, and shares your information when you download, install, access, or use the Routo mobile application (the "**App**"), our website, and any related services (collectively, the "**Service**").

If you do not agree with this Policy, do not use the Service. You indicate your acceptance by tapping "I agree" (or similar) during the App's onboarding flow and by continuing to use the Service after any updates.

Nothing here limits your statutory rights under Regulation (EU) 2016/679 (the **General Data Protection Regulation** or "**GDPR**"), the Polish Act of 10 May 2018 on personal-data protection, or other applicable laws.

1 Identity & Contact Details

Controller. Illarion Khliestov (business name: Routo) is the data controller for personal data processed under this Policy.

Email. support: routo@petprojectsatlas.com

Postal. Al. Jana Pawła II 65/120, 01-038 Warsaw, Poland

We have not appointed a Data Protection Officer because our processing operations do not require one under GDPR Article 37. We review this assessment annually.

2 What Data We Can Collect

Category	Examples	Source
Identifiers	device identifier (IDFV/IDFA), IP address, language settings, country, advertising identifiers (IDFA / GAID)	automatically from your device

Precise Location	GPS coordinates, speed, heading	device sensors (with your consent)
Usage Data	taps, screens viewed, session duration, routing queries	App telemetry via Amplitude
Purchase & Subscription Data	transaction ID, product ID, price, currency, renewal status	Apple IAP / RevenueCat
Diagnostics	crash logs, performance metrics	Apple Crashlytics / internal logging
Marketing & Attribution Events	install timestamp, campaign ID, ad-click time, first-open event, in-app purchase value	AppsFlyer & Google Ads SDKs
Communications	emails you send to support	you

We do not create user accounts; no usernames or passwords are stored.

3 Why We Process Your Data & Lawful Bases

Purpose	Lawful Basis (GDPR Art. 6)
Provide core routing, display maps and nearby places	Performance of contract (Art. 6(1)(b))
Measure Service performance, fix bugs, prevent abuse	Legitimate interests (Art. 6(1)(f)) – we balance our interest in a safe, reliable Service against your rights; you may object (see Section 10)
Process payments, manage Subscriptions, send renewal reminders	Performance of contract; Legal obligation for bookkeeping (Art. 6(1)(c))
Send marketing notifications or newsletters	Consent (Art. 6(1)(a)) – optional, can be withdrawn at any time
Display push notifications of nearby addresses or offers	Consent (location & marketing)
Measure advertising campaign performance and deliver	Consent (Art. 6 (1)(a))

personalised offers (AppsFlyer, Google Ads)

When we rely on **legitimate interests**, we document a balancing test and offer an opt-out mechanism (Section 10.5).

4 Third-Party Processors & Sharing

We share data **only as necessary** to deliver the Service:

Recipient	Role	Data Shared	Safeguard
Google LLC – Maps / Routes / Places APIs	mapping, geocoding, traffic	GPS, query strings	Standard Contractual Clauses (2021)
Amplitude Inc. (EU data residency)	product analytics	Identifiers, Usage Data	SCCs + Data-Processing Addendum
RevenueCat Inc.	subscription management	purchase receipts, IDFV	SCCs
Apple Inc.	payment & crash logs	purchase info, Diagnostics	adequacy (EU–US DPR)
Hosting & security vendors	cloud infrastructure, monitoring	all categories	SCCs / EU data centres
AppsFlyer Ltd.	ad-attribution & remarketing	IDFA/GAID, campaign IDs, install & in-app events	Standard Contractual Clauses (2021)
Google LLC – Google Ads / Firebase	ad-attribution & personalised ads	same as above	SCCs + EU–US Data Privacy Framework

We do **not** sell personal data. If we undergo a merger or acquisition, data will transfer under the same safeguards.

5 International Transfers

Where data is transferred outside the European Economic Area, we rely on:

- **European Commission adequacy decisions** (e.g., EU–US Data Privacy Framework).
- **Standard Contractual Clauses** adopted under Commission Implementing Decision (EU) 2021/914.
- Data sent to AppsFlyer’s Israeli and U.S. servers is protected by the European Commission’s Standard Contractual Clauses.

Copies of relevant transfer safeguards are available on request (email us at the address above).

6 Cookies & Mobile Tracking Technologies

We do not set browser cookies inside the iOS App. We use device identifiers (IDFA/IDFV) for analytics and, with your opt-in consent, marketing attribution.

The App will show Apple’s App Tracking Transparency (ATT) prompt. We do **not** initialise the AppsFlyer or Google Ads SDKs, nor do we access the device’s IDFA, until you tap “Allow.” You can later disable ad tracking in iOS **Settings** → **Privacy & Security** → **Tracking**.

7 Children

The Service is **not directed to anyone under 16**. We do not knowingly collect personal data from children. If you believe that a child has provided us data, contact us and we will delete it without undue delay.

8 Security

We care about the security of Your Personal Data and adhere to generally accepted industry standards to protect the data transmitted to Us.

No method of transmitting data over the Internet or electronic storage is 100% secure. Therefore, we cannot guarantee absolute security.

We never process any special categories of Personal Data or conduct Personal Data profiling.

9 Retention Schedule

Data Category	Retention Period	Rationale
Diagnostics (crash logs)	90 days	debug and stability improvement
Purchase & Subscription records	5 years	Polish accounting law
Support emails	24 months	follow-up and dispute resolution
Analytics events	25 months	trending without long-term re-identification
Ad-attribution logs	24 months, then deleted or aggregated	AppsFlyer default retention for campaign-performance metrics

We may retain data longer if required by law or to establish, exercise, or defend legal claims.

10 Your Rights

Under GDPR (and, where applicable, US or UK law) you have:

1. **Right of access** – obtain a copy of your data.
2. **Right to rectification** – correct inaccurate data.
3. **Right to erasure** – request deletion where we have no legal reason to keep it.
4. **Right to restriction** – limit processing in certain cases.
5. **Right to data portability** – receive data in a machine-readable format.
6. **Right to object** – to processing based on legitimate interests or direct marketing.
7. **Right to withdraw consent** – at any time, without affecting prior processing.
8. **Right to lodge a complaint** – with the **President of the Personal Data Protection Office (UODO)** or your local EU authority.

Additional local rights. Depending on your country or state of residence, you may have other privacy rights—for example, the right to opt-out of “sale” or “sharing” of personal information under the California Consumer Privacy Act (CCPA). Where such rights apply to our processing, we will honour them. You can exercise any additional right through the same contact channels described below.

You may also withdraw consent for ad-tracking at any time via the in-app toggle or iOS settings.

10.1 Exercising Your Rights

Send an email from the address associated with your device to **routo@petprojectsatlas.com** with your request. We may ask for proof of identity (e.g., a confirmation code sent to your device). We will respond within **30 days** (extensions possible under GDPR Art. 12(3)).

11 Automated Decision-Making & Profiling

We do not make decisions that produce legal or similarly significant effects based solely on automated processing. Analytics segmentation is used only to improve product performance and does not significantly affect individuals.

12 Changes to This Policy

We may update this Policy from time to time. If we make material changes, we will notify you in the App **at least 30 days before** the new version takes effect and request renewed consent where required by law.

13 Contact & Complaints

If you have questions about this Policy or our privacy practices, contact us at **routo@petprojectsatlas.com** or by post at the address above.

You also have the right to lodge a complaint with:

President of the Personal Data Protection Office (UODO)

ul. Stawki 2, 00-193 Warsaw, Poland

<https://uodo.gov.pl>