

# DiviD Privacy Policy



This Privacy Policy provides our policies and procedures for collecting, using, and disclosing your information. Users can access the DiviD web application through our website [www.dividapp.com](http://www.dividapp.com), applications on Devices, through APIs, and through third parties. A “Device” is any computer used to access the DiviD application including without limitation a desktop, laptop, mobile phone or tablet. This Privacy Policy governs your access of the DiviD application, regardless of how you access it, and by using our application you consent to the collection, transfer, processing, storage, disclosure and other uses described in this Privacy Policy. All of the different forms of data, content, and information described below are collectively referred to as “information”. This Policy is incorporated into and is subject to the DiviD Terms of Use.

## 1. Personal data protection

Any visit to, and/or use of, the DiviD website involves the collection and processing of personal data. In compliance with relevant legal provisions, DiviD has established a clear and precise policy for the protection of personal data.

DiviD has also implemented safety measures to avoid any loss, abuse or destruction of personal data that belongs to users of the website which has been disclosed to DiviD. The processing of personal data collected by DiviD through the use of this website falls under Dutch Law (Dutch Data Protection Act d.d. 01-05-2018). Any collection of personal data, especially as a result of any registration (including, but not limited to, subscriptions to newsletters and use of the extranet), is done with your explicit consent to such collection and processing by DiviD of the disclosed data. This data protection policy is without prejudice to DiviD’s rights and obligations to users of this website as set out in any contract, or in any statute, or under any legal or regulatory provision or requirement.

## 2. Personal data

Following your visit to this website, DiviD will store information you provide. When you register an account, we collect some personal information, such as your email address, name, function, company name and phone number. Billing information such as your credit card or bank account information will be requested if you purchase your subscription to DiviD via our payment provider. You may also provide us with your contacts’ email addresses when sharing folders or files with them. Files: we collect and store the files you upload or access with the DiviD web application. If you add a file to your DiviD account that has been previously uploaded by you or another user, we may associate all or a portion of the previous file with your account rather than storing a duplicate. Log Data: When you use the DiviD application, we automatically record information from your device, its software, and your activity using the our services. This may include the device’s Internet Protocol (“IP”) address, browser type, the web page visited before you came to our website, information you search for on our website, locale preferences, identification numbers associated with your devices, your mobile carrier, date and time stamps associated with transactions, system configuration information, metadata concerning your files, and other interactions with the web application. Cookies: We also use “cookies” to collect information and improve our services. A cookie is a small data file that we transfer to your device. We may use “persistent cookies” to save your registration ID and login password for future logins to our service’s. We may use “session ID cookies” to enable certain features of the service, to better understand how you interact with the application and to monitor aggregate usage and web

traffic routing on the service. You can instruct your browser, by changing its options, to stop accepting cookies or to prompt you before accepting a cookie from the websites you visit. If you do not accept cookies, however, you may not be able to use all aspects of the web application.

### 3. How We Use Personal Information

**Personal Information:** In the course of using the application, we may collect personal information that can be used to contact or identify you. Personal Information is or may be used: (i) to provide and improve our Service, (ii) to administer your use of the Service, (iii) to better understand your needs and interests, (iv) to personalize and improve your experience, and (v) to provide or offer software updates and product announcements. If you no longer wish to receive communications from us, please follow the “unsubscribe” instructions provided in any of those communications, or update your account settings information. **Geo-Location Information:** Some Devices allow applications to access real-time location-based information (for example, GPS). Our mobile apps do not collect such information as of the date this policy went into effect, but may do so in the future with your consent to improve our Services. Some photos you place in DiviD may contain recorded location information. We may use this information to optimize your experience. Some of the information we collect from a device, for example an IP address, can sometimes be used to approximate a device’s location. **Analytics:** We also collect information using logging and cookies which can sometimes be correlated with Personal Information. We use this information to monitor and analyze use of the service for the web applications technical administration to increase our applications functionality and user-friendliness, and to verify that users have the authorization needed for the service to process their requests. As of the date this policy went into effect, we use Google Analytics. To learn more about the privacy policy of Google Analytics, click [here](#), and to learn how to opt out of that service click [here](#)

### 4. Information Sharing and Disclosure

**Usage:** We will display your Personal Information in your profile page and elsewhere on the service according to the preferences you set in your account. Any information you choose to provide should reflect how much you want others to know about you. Please consider carefully what information you disclose in your profile page and your desired level of anonymity. You can review and revise your profile information at any time. We may also share or disclose your information with your consent, for example if you use a third party application to access your account (see below). Through certain features of the service, you may also have the ability to make some of your information public. Public information may be broadly and quickly disseminated. **Service Providers, Business Partners and Others:** We may use certain trusted third party companies and individuals to help us provide, analyze, and improve the Service (including but not limited to data storage, maintenance services, database management, web analytics, payment processing, and improvement of the Service’s features). These third parties may have access to your information only for purposes of performing these tasks on our behalf and under obligations similar to those in this Privacy Policy. As of the date this policy went into effect, we use Amazon’s S3 storage service to store some of your information such as files. You can find more information on Amazon’s data security from the S3 site. **Third-Party Applications:** We may share your information with a third party application with your consent, for example when you choose to access our services through such an application. We are not responsible for what those parties do with your information, so do be advised you trust the application and that it’s privacy policy is acceptable to you. **Business Transfers:** If we are involved in a merger, acquisition, or sale of all or a portion of our assets, your

information may be transferred as part of that transaction, but we will notify you (for example, via electronic mail and/or a prominent notice on our website) of any change in control or use of your Personal Information or Files, or if either become subject to a different Privacy Policy. We will also notify you of choices you may have regarding the information. Non-private or Non-Personal Information. We may disclose your non-private, aggregated, or otherwise non-personal information, such as usage statistics of our service.

## **5. Right of access, right to request corrections or deletions and right to object**

In compliance with the Dutch Data Protection Act d.d. 01-05-2018, you are entitled to the following rights at any time and free of charge: right to access your personal data held by DiviD, right to request corrections to such data, right to request that certain personal data be removed or deleted, and right to object to the processing of your personal data. These rights can be exercised by writing to DiviD, Marconistraat 16, 3029 AK, Rotterdam, The Netherlands or by sending an email to [support@dividapp.com](mailto:support@dividapp.com)

The right to object can also be exercised by clicking on the link appearing below every bulletin beside the words: "If you do not wish to receive future information letters, please click here. If you unregister, but do not receive confirmation of your unregistration, please send an email to [support@dividapp.com](mailto:support@dividapp.com), specifying the email address which is to be unregistered."

## **6. Security**

We have exercised our fullest efforts to implement appropriate safety measures to prevent the loss, abusive use and/or destruction of personal data on our website. The security of your information is important to us. When you enter sensitive information (such as credit card / bank details) on our order forms, we encrypt the transmission of that information using secure socket layer technology (SSL). We follow generally accepted standards to protect the information submitted to us, both during transmission and once we receive it. No method of electronic transmission or storage is 100% secure. Therefore, it is not possible to guarantee its absolute security. If you have any questions about security on our website, you can contact us at [support@dividapp.com](mailto:support@dividapp.com).

## **7. Changes to our Privacy Policy**

This privacy policy may change as technology develops through time. If we make a change to this privacy policy that we believe materially reduces your rights, we will provide you with proper notice by email. By continuing to use the DiviD application after those changes take effect, you automatically agree to be bound by the revised privacy policy.

## **8. Protection of Privacy Commission**

For more information on privacy and personal data protection, please visit link: <http://wetten.overheid.nl/BWBR0011468/>.

## **9. Dispute, jurisdiction and applicable Law**

These general terms and conditions of use shall be governed and construed in accordance with Dutch Law. Any dispute arising from, or related to, the use of this website and/or these general terms and conditions of use will be subject to conciliation between the parties involved. In the event that conciliation fails between the parties, the dispute will be referred to the Tribunals of Rotterdam (The Netherlands). In the event of any judicial or administrative proceedings, the printed version of these General Terms and Conditions of Use and of any other notice provided by DiviD on this website or in electronic format, shall enjoy the same standing as commercial documents or registers created and stored in hard copy.

## **10. International Visitors**

The Service is hosted in the European Union and is intended for visitors located within the European Union. If you choose to use the Service from North America or other regions of the world with laws governing data collection and use that may differ from European Union law, then please note that you are transferring your personal information outside of those regions to the European Union for storage and processing. Also, we may transfer your data from the European Union to other countries or regions in connection with storage and processing of data, fulfilling your requests, and operating the Service. By providing any information, including personal information, on or to the Service, you consent to such transfer, storage, and processing.

## **11. Our Contact Information**

Please contact us with any questions or comments about this Policy, your personal information, our use and disclosure practices, or your consent choices by email at [support@dividapp.com](mailto:support@dividapp.com).

Construction Synergy BV, Marconistraat 16, 3029 AK Rotterdam, The Netherlands