

PRIVACY POLICY

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PRIVACY POLICY

This privacy policy applies to our mobile iOS and Android apps (hereinafter "APP" and/or "PRODUCT"), as you can use all platforms simultaneously with your WhosClose account.

This Privacy Notice for **WhosClose App** ("**we**", "**us**" or "**our**") explains how and why we collect, use, store, and share ("**process**") your personal data when you use our services ("**Services**"). This includes when you:

- Download and use our mobile APP, or any other application of ours that links to this Privacy Notice
- Use the features and functionalities of APP
- Interact with us through our websites, support channels, sales activities, events, or marketing materials

Questions or concerns? Reading this Privacy Notice will help you understand your privacy rights and choices. We are responsible for making decisions about how your personal information is processed. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at dp@whoscloze.com. WhosApp GmbH, with registered office at Zugspitzstraße 15, 82049 Pullach, Germany, acts as the Data Controller of your personal information.

We may update this document from time to time to reflect changes in legal requirements or our services. All changes will be published here, and if the changes are significant, we will notify you through the app or by email.

SUMMARY OF KEY POINTS

This summary provides key points from our Privacy Notice, but you can find out more details about any of these topics by clicking the link following each key point or by using our table of contents below to find the section you are looking for.

What personal information do we process?

When you visit, use, or navigate our Services, we may process personal information depending on how you interact with us and the Services, the choices you make, and the products and features you use. Learn more about personal information you disclose to us.

Do we process any sensitive personal information?

Some of the information may be considered "special" or "sensitive" in certain jurisdictions, for example your racial or ethnic origins, sexual orientation, and religious beliefs. We do not process sensitive personal information.

Do we collect any information from third parties?

We do not collect any information from third parties.

How do we process your information?

We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent. We process your information only when we have a valid legal reason to do so. Learn more about how we process your information.

In what situations and with which parties do we share personal information?

We may share information in specific situations and with specific third parties. Learn more about when and with whom we share your personal information.

How do we keep your information safe?

We have adequate organizational and technical processes and procedures in place to protect your personal information. However, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Learn more about how we keep your information safe.

What are your rights?

Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal information. Learn more about your privacy rights.

How do you exercise your rights?

The easiest way to exercise your rights is by contacting us. We will consider and act upon any request in accordance with applicable data protection laws.

Want to learn more about what we do with any information we collect? Review the Privacy Notice in full.

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1. WHAT INFORMATION DO WE COLLECT?

Personal information you disclose to us

In Short: We collect personal information that you provide to us.

We collect personal information that you voluntarily provide to us when you register on the Services, express an interest in obtaining information about us or our products and Services, when you participate in activities on the Services, or otherwise when you contact us.

Personal Information Provided by You.

The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make, and the products and features you use. The personal information we collect may include the following:

- names
- phone numbers
- email address

We do not knowingly collect personal information from individuals under the age of 16. You must be at least 16 years old (or the minimum age required by your country's data protection laws) to use the Services or provide personal data to us. By registering, you confirm that you are at least 16 years old. We do not use technical age verification, but will act promptly to delete any account if we learn that a user is under the required age.

For more information on eligibility, please see our Terms and Conditions.

Sensitive Information. We do not process sensitive information.

Social Media Login Data. We may provide you with the option to register with us using your existing social media account details, like your Google Login, Apple Login, or other social media account. If you choose to register in this way, we will collect certain profile information about you from the social media provider, as described in the section called "HOW DO WE HANDLE YOUR SOCIAL LOGINS?" below.

Application Data. If you use our application(s), we also may collect the following information if you choose to provide us with access or permission:

Geolocation Information. We may request access or permission to track location-based information from your mobile device, either continuously or while you are using our mobile application(s), to provide certain location-based services. If you wish to change our access or permissions, you may do so in your device's settings.

Mobile Device Access. We may request access or permission to certain features from your mobile device, including your mobile device's contacts, camera, and other features. If you wish to change our access or permissions, you may do so in your device's settings.

Mobile Device Data. We automatically collect device information (such as your mobile device ID, model, and manufacturer), operating system, version information and system configuration information, device and application identification numbers, browser type and version, hardware model Internet service provider and/or mobile carrier, and Internet Protocol (IP) address (or proxy server). If you are using our application(s), we may also collect information about the phone network associated with your mobile device, your mobile device's operating system or platform, the type of mobile device you use, your mobile device's unique device ID, and information about the features of our application(s) you accessed.

Push Notifications. We may request to send you push notifications regarding your account or certain features of the application(s). If you wish to opt out from receiving these types of communications, you may turn them off in your device's settings.

This information is primarily needed to maintain the security and operation of our application(s), for troubleshooting, and for our internal analytics and reporting purposes.

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

Information automatically collected

In Short: Some information — such as your Internet Protocol (IP) address and/or browser and device characteristics — is collected automatically when you visit our Services.

We automatically collect certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services, and other technical information. This information is primarily needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies.

The information we collect includes:

Log and Usage Data.

Log and usage data is service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use our Services and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type, and settings and information about your activity in the Services (such as the date/time stamps associated with your usage, pages and files viewed,

searches, and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called "crash dumps"), and hardware settings).

Device Data.

We collect device data such as information about your computer, phone, tablet, or other device you use to access the Services. Depending on the device used, this device data may include information such as your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model, Internet service provider and/or mobile carrier, operating system, and system configuration information.

Location Data.

We collect location data from your device to enable features such as live location sharing, proximity-based visibility, or location history. Depending on your device and settings, this may include precise location (via GPS or Wi-Fi) or approximate location (via IP address). If you enable location-based features in the app, your location may be stored to create a personal location history — for example, to help you view where you have been while using the service. This location history is stored securely and cannot be manually deleted by the user. Upon account deletion, the history is anonymized by removing all identifiers linking it to your user profile, making it no longer attributable to you.

Your location data is processed based on your explicit consent (Art. 6(1)(a) GDPR), which you can grant or withdraw via your device's settings or within the app. If location-based services are an essential part of your account features, we may rely on contractual necessity (Art. 6(1)(b) GDPR).

Please note that disabling location access may affect certain functionalities of the app.

Google API

Our use of information received from Google APIs will adhere to [Google API Services User Data Policy](#), including the [Limited Use requirements](#).

Chat Feature

If you use the chat feature in our app, we may collect and process personal data you submit in messages (such as text, profile name, or metadata) as part of your communication with other users.

Mobile Phone Number

We collect your mobile phone number when you register or update your profile. This is required to verify your identity and protect against fraudulent account creation.

2. HOW DO WE PROCESS YOUR INFORMATION?

In Short: *We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent.*

We process your personal information for a variety of reasons, depending on how you interact with our Services, including:

- **To facilitate account creation and authentication and otherwise manage user accounts.**

We may process your information so you can create and log in to your account, as well as keep your account in working order. We use your mobile phone number to send a one-time SMS verification code during account setup or updates. This process ensures that the number belongs to you and helps maintain the integrity of our user base.

- **To enable user-to-user communications.**

We may process your information if you choose to use any of our offerings that allow for communication with another user.

- **To request feedback.**

We may process your information when necessary to request feedback and to contact you about your use of our Services.

- **To identify usage trends.**

We may process information about how you use our Services to better understand how they are being used so we can improve them.

- **To provide location-based services.**

We use device location data to enable location-based features such as live location sharing, proximity-based user visibility, or showing users who are nearby (e.g., within 1,000 meters or <10 meters). Your device's location is processed temporarily to determine proximity to others or trigger relevant features, but we do not permanently store your raw latitude or longitude coordinates.

Instead, only a proximity status flag or location match indicator (e.g., "nearby," "same place," "live") is stored in our system. This ensures minimal data exposure and avoids retaining precise location history.

Location data is processed only with your explicit consent in accordance with Art. 6(1)(a) GDPR, which you can grant or withdraw via your device's location settings at any time. You may also manage your preferences in the app's privacy settings.

- **To save or protect an individual's vital interest.**

We may process your information when necessary to save or protect an individual's vital interest, such as to prevent harm.

3. WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR INFORMATION?

In Short: *We only process your personal information when we believe it is necessary and we have a valid legal reason (i.e., legal basis) to do so under applicable law, like with your*

consent, to comply with laws, to provide you with services to enter into or fulfill our contractual obligations, to protect your rights, or to fulfill our legitimate business interests.

If you are located in the EU or UK, this section applies to you.

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on in order to process your personal information. As such, we may rely on the following legal bases to process your personal information:

- **Consent.**

We may process your information if you have given us permission (i.e., consent) to use your personal information for a specific purpose. You can withdraw your consent at any time. Learn more about withdrawing your consent.

- **Performance of a Contract.**

We may process your personal information when we believe it is necessary to fulfill our contractual obligations to you, including providing our Services or at your request prior to entering into a contract with you.

- **Legitimate Interests.**

We may process your information when we believe it is reasonably necessary to achieve our legitimate business interests and those interests do not outweigh your interests and fundamental rights and freedoms. For example, we may process your personal information for some of the purposes described in order to:

- Analyze how our Services are used so we can improve them to engage and retain users
- Understand how our users use our products and services so we can improve user experience

- **Legal Obligations.**

We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.

- **Vital Interests.**

We may process your information where we believe it is necessary to protect your vital interests or the vital interests of a third party, such as situations involving potential threats to the safety of any person.

In legal terms, we are generally the "data controller" under European data protection laws of the personal information described in this Privacy Notice, since we determine the means and/or purposes of the data processing we perform. This Privacy Notice does not apply to the personal information we process as a "data processor" on behalf of our customers. In those situations, the customer that we provide services to and with whom we have entered

into a data processing agreement is the "data controller" responsible for your personal information, and we merely process your information on their behalf in accordance with your instructions. If you want to know more about our customers' privacy practices, you should read their privacy policies and direct any questions you have to them.

If you are located in Canada, this section applies to you.

We may process your information if you have given us specific permission (i.e., express consent) to use your personal information for a specific purpose, or in situations where your permission can be inferred (i.e., implied consent). You can withdraw your consent at any time.

In some exceptional cases, we may be legally permitted under applicable law to process your information without your consent, including, for example:

- If collection is clearly in the interests of an individual and consent cannot be obtained in a timely way
- For investigations and fraud detection and prevention
- For business transactions provided certain conditions are met
- If it is contained in a witness statement and the collection is necessary to assess, process, or settle an insurance claim
- For identifying injured, ill, or deceased persons and communicating with next of kin
- If we have reasonable grounds to believe an individual has been, is, or may be victim of financial abuse
- If it is reasonable to expect collection and use with consent would compromise the availability or the accuracy of the information and the collection is reasonable for purposes related to investigating a breach of an agreement or a contravention of the laws of Canada or a province
- If disclosure is required to comply with a subpoena, warrant, court order, or rules of the court relating to the production of records
- If it was produced by an individual in the course of their employment, business, or profession and the collection is consistent with the purposes for which the information was produced
- If the collection is solely for journalistic, artistic, or literary purposes
- If the information is publicly available and is specified by the regulations

4. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

In Short: *We may share information in specific situations described in this section and/or with the following third parties.*

We may need to share your personal information in the following situations:

- **Business Transfers.**

We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

- **When we use Google Maps Platform APIs.**

In order to provide certain location-based functionalities (such as map display or proximity-based services), we may integrate and use Google Maps Platform APIs (e.g., Google Maps API, Places API). These services are provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

When using these APIs, location data is processed based on your device's technologies, such as GPS, Wi-Fi, and mobile network signals, to estimate your approximate position. This data allows Google Maps to offer services like route calculation or displaying nearby places. The accuracy of the location may vary depending on the technology and environment.

You may revoke your consent at any time by adjusting your device's location settings or by contacting us directly. Further details on how Google processes data can be found in the [Google Privacy Policy](#).

- **Other Users and Public Sharing**

Our Services may offer features that allow you to share certain content, such as a meetup or event, with others through a publicly accessible link. If you choose to activate this option, anyone with access to the unique link may view the shared information — including details such as the meetup title, time, location (if provided), and other information you voluntarily include.

We only make such information publicly available with your prior action or explicit consent. You are always in control of whether your meetups or events are shared publicly, and you may disable or delete the public link at any time via your account or event settings.

If you interact with other users within the Services (e.g., through profile interactions, user-to-user messaging, or social logins like Google Login), your basic profile information — such as your name, profile photo, and activity description — may be visible to other registered users, depending on your privacy settings.

Please note that when you voluntarily share personal information in public areas or via public links, that information may be accessible by others and may be indexed by search engines depending on the sharing settings and platform visibility.

- **Chat Feature**

To provide chat functionality, we use **Stream**, a real-time messaging infrastructure service operated by **GetStream.io, Inc.**, headquartered in the United States. Personal information such as message content, user IDs, and timestamps may be processed by GetStream to operate and deliver the chat services. Where data is transferred to countries outside the European Economic Area (such as the United States), we ensure appropriate safeguards are in place in accordance with Article 46 GDPR, such as **Standard Contractual Clauses (SCCs)**. You can learn more about Stream's privacy practices at: <https://getstream.io/legal/privacy/>

- **SMS Messages**

To send SMS messages, we use the third-party communications service provider Twilio Inc., headquartered in the United States. Twilio processes your mobile phone number solely for the purpose of delivering verification codes via SMS for account authentication and security purposes.

Since this involves a transfer of personal data outside the European Economic Area (EEA), we ensure appropriate safeguards are in place according to Article 46 GDPR, including Standard Contractual Clauses (SCCs) approved by the European Commission.

For more details, please see [Twilio's Privacy Policy](#).

- **Deep-Linking Services**

We use the deep-linking service provided by [AppsFlyer](#) to enable seamless navigation directly to specific content within our app. AppsFlyer helps us ensure that links shared through various channels open correctly in the intended location inside the app.

To deliver this functionality, AppsFlyer may process technical information from your device, such as:

- Device identifiers
- IP addresses
- Referral URLs

We do **not** share directly identifiable personal information (e.g., your name, email address, or phone number) with AppsFlyer.

For further details, please review AppsFlyer's [Privacy Policy](#).

- **Analytics & Usage Insights**

We use PostHog, an analytics platform operated by PostHog, Inc., headquartered in the United States, to analyze user behavior and interactions within our Services. This helps us identify usage patterns, optimize user experience, and improve the overall quality and performance of our app.

PostHog processes certain personal and technical information, including:

- Device information (type, operating system)
- Session details (duration, screens viewed)
- Interaction data (clicks, taps, events within the app)
- IP addresses (anonymized or truncated for enhanced privacy)

- Approximate location (derived from IP address)

PostHog acts as a data processor for WhosClose, processing data solely on our instructions and based on our legitimate interests under Art. 6(1)(f) GDPR, specifically for service improvement, debugging, and enhancing user experience. Where applicable, data transfers outside the European Economic Area (EEA) to the United States are safeguarded through appropriate measures, such as Standard Contractual Clauses (SCCs) pursuant to Article 46 GDPR.

PostHog does not independently share your data with third parties, and we have executed a Data Processing Agreement (DPA) with PostHog to ensure GDPR compliance.

For more details, please review [PostHog's Privacy Policy](#). You can opt-out of analytics data collection anytime through your in-app settings or by contacting us directly as detailed in "How can you contact us about this notice?".

- **Email Marketing & Transactional Communication**

We use MailerLite, a newsletter and email marketing platform provided by UAB "MailerLite", based in the European Union, to send marketing communications to users who have expressly opted in.

If you subscribe to receive newsletters, updates, or promotional offers from us, your name and email address will be processed by MailerLite solely for this purpose, under our instructions and in accordance with a Data Processing Agreement (DPA) as required by Article 28 GDPR. You can unsubscribe from marketing communications at any time by clicking the unsubscribe link included in every email or by contacting us directly. MailerLite does not use your data for its own purposes. For more information, please refer to [MailerLite's Privacy Policy](#).

We use MailerSend, also operated by UAB "MailerLite", to send essential transactional emails, such as important service-related updates (e.g. changes to our Privacy Policy or Terms of Service). These communications are necessary for the performance of our services and may not be unsubscribed from.

MailerSend processes your email address and related technical data solely to deliver these messages on our behalf and under our instructions, in full compliance with GDPR and pursuant to Article 28 GDPR.

Learn more about MailerSend's privacy practices here:

<https://www.mailersend.com/legal/privacy-policy>

Both MailerLite and MailerSend store and process data in secure, ISO-certified data centers located in the European Union. Where necessary, and in accordance with GDPR requirements, data transfers outside the EEA are protected using Standard Contractual Clauses (SCCs).

- **Infrastructure and Cloud Hosting**

We use cloud services provided by Amazon Web Services (AWS) to support various technical components of our platform, including data hosting, account management, authentication, and transactional communications. Personal data may be processed by AWS solely on our behalf and under strict contractual and security controls in compliance with Article 28 GDPR.

Where data is transferred outside the European Economic Area (EEA), such as to

AWS infrastructure in the United States, we ensure appropriate safeguards are in place, including Standard Contractual Clauses (SCCs) approved by the European Commission. You can learn more about AWS's data protection practices at: <https://aws.amazon.com/privacy/>

5. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

In Short: *We may use cookies and other tracking technologies to collect and store your information.*

We use cookies and similar tracking technologies (like web beacons and pixels) to gather information when you interact with our Services. These technologies help maintain the security of our Services and your account, prevent crashes, fix bugs, save your preferences, and assist with basic functionality and user experience optimization.

We may also allow third-party service providers to use tracking technologies on our Services for analytics and marketing purposes. Specific details regarding the third-party providers we use, such as our analytics provider, can be found under "WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?".

We do not use cookies or tracking technologies before you create an account. By registering and agreeing to our Privacy Policy, you consent to the use of necessary technologies for operating and improving the app. You can manage analytics preferences at any time in the app settings.

Specific information about how we use such technologies and how you can refuse certain cookies can be followed in the next chapters.

5.1 Cookie Notice

This Cookie Notice explains how WhosClose ("we", "us", or "our") uses cookies and similar tracking technologies in our mobile app. By using our services, you acknowledge our use of these technologies as described in this Notice.

5.2 What Are Cookies and Similar Technologies?

Cookies, SDKs (Software Development Kits), and similar tracking technologies are small pieces of data stored on your device or sent from your device to a server. They help us provide essential app functionalities, analytics, and better user experiences.

5.3 Categories of Cookies and Technologies We Use

(a) Essential and Functional Technologies

These technologies are necessary for the app to function correctly. Without them, key features such as user authentication, chat services, and SMS verification cannot operate.

- Twilio: Used for SMS verification codes essential for securing user accounts.

- GetStream: Powers our chat functionality, enabling real-time messaging and user interactions.

(b) Analytics and Performance Technologies

These help us understand user behavior, optimize performance, and improve user experience.

- PostHog: Provides insights on user interactions, app performance, and usage patterns. Data collected includes device type, session duration, screen visits, IP addresses (anonymized or truncated), and approximate location (based on IP).

(c) Location-Based Services

These technologies help us deliver location-based functionalities, such as event suggestions or interactive maps.

- Google Maps API: Processes device location data (approximate or precise) to provide map displays and nearby place recommendations.

(d) AI-Powered Features

Some features in our app are powered by artificial intelligence to assist with content generation and personalization.

- OpenAI: We use services from OpenAI, L.L.C., based in the United States, to provide AI-assisted functionalities such as generating titles or content suggestions. Inputs and outputs may be processed by OpenAI. No directly identifiable personal data is transmitted. Data may be transferred to the U.S., and we rely on appropriate safeguards such as Standard Contractual Clauses (SCCs) under Article 46 GDPR. For more information, see [OpenAI's Privacy Policy](#).

5.4 How to Manage or Opt-Out

You have the right to manage or disable certain cookies and tracking technologies:

- PostHog Analytics: Adjust your in-app settings to opt-out of analytics tracking.
- Location Services: Manage your location permissions directly in your device's settings to restrict or disable access to location data.

Note: Essential technologies (Twilio, GetStream) are necessary for core functionalities, and it is not possible to manage or opt-out of these without significantly affecting your app experience or rendering some services unavailable.

5.5 How Long Do Cookies and Data Remain Active?

Analytics data: Retained as defined in our Privacy Policy, typically not longer than necessary for analysis (see Privacy Policy "4. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?")

Essential functionalities (Twilio, GetStream): Data retained as necessary for account management and service provision.

6. DO WE OFFER ARTIFICIAL INTELLIGENCE-BASED PRODUCTS?

In Short: *We offer products, features, or tools powered by artificial intelligence, machine learning, or similar technologies.*

As part of our Services, we offer features that are powered by artificial intelligence (AI) or machine learning technologies (“AI Products”) to enhance functionality and improve user experience. These features may include, for example, **automatic generation of titles based on your interests** and, in the future, **AI-powered chat assistants to help you create meetups or use other parts of the platform**.

We provide these AI features through carefully selected third-party service providers (“AI Service Providers”), including **OpenAI**. Your data — including inputs (e.g., interests, descriptions), outputs (e.g., suggested titles), and relevant context — may be processed by these providers to deliver the AI-powered functionality described above.

We use OpenAI’s API in a way that minimizes data exposure. No personally identifiable information is shared. Data sent through OpenAI is not used to train models, in accordance with OpenAI’s API data usage policy.

All personal data processed using our AI Products is handled in accordance with this Privacy Notice and applicable data protection laws, including the **General Data Protection Regulation (GDPR)**. The processing is based on legitimate interest (Art. 6(1)(f) GDPR) and/or your consent where required (Art. 6(1)(a) GDPR), and is protected by **appropriate safeguards**, including data minimization and secure transmission.

You do not need to take any action to enable or disable these AI-powered features — they are part of the platform’s core functionality. We remain fully responsible for ensuring that your data is processed securely and lawfully, and **you are not responsible for the terms or actions of any AI provider**.

We do not use AI for profiling or automated decision-making that produces legal or similarly significant effects on you.

7. HOW DO WE HANDLE YOUR SOCIAL LOGINS?

In Short: *If you choose to register or log in to our Services using a social media account, we may have access to certain information about you.*

Our Services offer you the ability to register and log in using your third-party social media account details (like your Facebook or X logins). Where you choose to do this, we will receive certain profile information about you from your social media provider. The profile information we receive may vary depending on the social media provider concerned, but will often include your name, email address, friends list, and profile picture, as well as other information you choose to make public on such a social media platform.

We will use the information we receive only for the purposes that are described in this Privacy Notice or that are otherwise made clear to you on the relevant Services. Please note that we do not control, and are not responsible for, other uses of your personal information by your third-party social media provider. We recommend that you review their privacy notice to understand how they collect, use, and share your personal information, and how you can set your privacy preferences on their sites and apps.

8. HOW LONG DO WE KEEP YOUR INFORMATION?

In Short: *We keep your information for as long as necessary to fulfill the purposes outlined in this Privacy Notice unless otherwise required by law.*

We will only keep your personal information for as long as it is necessary for the purposes set out in this Privacy Notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). No purpose in this notice will require us keeping your personal information for longer than the period of time in which users have an account with us.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

9. HOW DO WE KEEP YOUR INFORMATION SAFE?

In Short: *We aim to protect your personal information through a system of organizational and technical security measures.*

We have implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

10. WHAT ARE YOUR PRIVACY RIGHTS?

In Short: *In some regions, such as the European Economic Area (EEA), United Kingdom (UK), Switzerland, and Canada, you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time, depending on your country, province, or state of residence.*

In some regions (like the EEA, UK, Switzerland, and Canada), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; (iv) if applicable, to data portability; and (v) not to be subject to automated decision-making. In certain circumstances, you may also have the right to object to the processing of your personal information. You can make such a request by contacting us by using the contact details provided in the section *"HOW CAN YOU CONTACT US ABOUT THIS NOTICE?"* below.

We will consider and act upon any request in accordance with applicable data protection laws.

If you are located in the EEA or UK and you believe we are unlawfully processing your personal information, you also have the right to complain to your Member State data protection authority or UK data protection authority.

If you are located in Switzerland, you may contact the Federal Data Protection and Information Commissioner.

Withdrawing your consent:

If we rely on your consent to process certain types of personal information — such as your location, interests, public sharing of meetups, or the use of optional AI features — you have the right to withdraw that consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

You can withdraw your consent in the following ways:

- For specific features (such as location tracking, notifications, or public sharing), you can manage or disable them directly via your device settings or, where available, via the in-app preferences.
- For full withdrawal of consent regarding all processing based on consent, you may contact us at the details provided in the section *"HOW CAN YOU CONTACT US ABOUT THIS NOTICE?"*. If full withdrawal is requested and essential parts of our services rely on that consent (e.g. user account functionality), this may result in the deletion or deactivation of your account.

We will comply with your request in accordance with applicable data protection laws and will inform you about any consequences of the withdrawal (e.g., limitations in service use).

However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, when applicable law allows, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

Account Information

If you would at any time like to review or change the information in your account or terminate your account, you can:

- Log in to your account settings and update your user account.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our legal terms and/or comply with applicable legal requirements.

Cookies and similar technologies:

Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Services.

If you have questions or comments about your privacy rights, you may email us at dp@whosclos.e.app.

11. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage, no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this Privacy Notice.

12. DO WE MAKE UPDATES TO THIS NOTICE?

In Short: *Yes, we will update this notice as necessary to stay compliant with relevant laws.*

We may update this Privacy Notice from time to time. The updated version will be indicated by an updated "Revised" date at the top of this Privacy Notice. If we make material changes to this Privacy Notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this Privacy Notice frequently to be informed of how we are protecting your information.

13. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may contact our Data Protection Officer (DPO) by email at dp@whosclos.e.app, or contact us by post at:

WhosApp GmbH

Data Protection Officer

Zugspitzstraße, 15, 82049, Pullach/Germany

If you are a resident in the European Economic Area or Switzerland, we are the "data controller" of your personal information. You can contact them directly regarding our processing of your information, by email at dp@whoscloze.app, or by post to:

Data Protection Officer
Zugspitzstraße, 15, 82049, Pullach/Germany

14. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

Based on the applicable laws of your country (such as the General Data Protection Regulation – GDPR in the European Union), you may have the right to:

- Request access to the personal information we hold about you
- Receive information on how your data has been processed
- Correct inaccurate or outdated data
- Request the deletion of your personal information
- Withdraw your consent to processing where applicable

You can **review, update, or delete your personal account information directly within the app** by accessing your account settings.

If you wish to exercise other rights under data protection law — such as requesting a copy of your data, objecting to certain processing, or limiting its use — please contact us at dp@whoscloze.app. We will respond in accordance with applicable legal requirements.

Please note that these rights may be subject to certain limitations, for example, where we are legally required to retain data (e.g., for fraud prevention, legal compliance, or tax obligations).