

# PlanetRomeo Privacy Statement

Your privacy and that of all our Users is very important to PlanetRomeo. When you visit or use the PlanetRomeo Website or App we receive Data that is personal to you. This Privacy Statement describes how PlanetRomeo safeguards and processes your Personal Data. We recommend you read it carefully. Words in this Privacy Statement that are indicated with a capital letter are defined in the PlanetRomeo Terms of Use (<https://www.planetromeo.com/terms-of-use/>).

This Privacy Statement includes information about:

- The kinds of Personal Data processed by PlanetRomeo
- Cookies and similar technologies
- For what purposes does PlanetRomeo process Personal Data?
- What security measures are in place to protect Personal Data?
- PlanetRomeo's limits of responsibility concerning third parties
- Viewing and changing your Personal Data
- Changes to this Privacy Statement
- Applicable law and competent court
- What to do if you have any questions or remarks

## 1. The kinds of Personal Data processed by PlanetRomeo

1. Essential Account and Profile data  
To access the non-public part of the Service, you must first create an Account. PlanetRomeo offers four different kinds of Account (user, club, guide, escort). When you create an Account, you have to provide some Personal Data, such as your preferred profile name, your location, your birth date and your email address. PlanetRomeo stores this Personal Data as well as other Personal Data provided by you when you use the Service.
2. Voluntarily provided data  
You can voluntarily upload additional Personal Data to your Account and Profile, for example body stats, personal interests, information about your sexual preferences, and how people can get in touch with you. You can also choose to upload and display personal photos of yourself in your Profile or your gallery.

Personal Data that you upload to your profile or that you post on the Website becomes public. This means that anyone may be able to see this information, for example through the User search feature. You should always think carefully about what information you want to make public and what you would prefer to keep private. You can customize your privacy settings in your Account.

If you choose to purchase Additional Services such as a PLUS subscription, you will need to provide certain information to our payment provider Acapture, as further described in "3. For what purposes does PlanetRomeo process Personal Data?", sub 3.

If you have any written communication with PlanetRomeo's support, the communication and any data supplied to PlanetRomeo will be stored.

3. Location data

When using the Service you have to provide your location, which we store on our servers. You choose your location by means of Google Location Services and your web browser or mobile device. For a description of data collected and used by them, please see their privacy policies. You may also choose to share your location. In doing so, other functionalities become available. This will, for instance, enable you to see the distance between yourself and other Users.

Like on other websites and apps, revealing your location is not without risk. Sharing your location can reveal intimate information about yourself and your activities. Because of these risks, PlanetRomeo gives you the option of choosing if a location is shared or not.

Please be aware, if you activate your mobile position which is automatically tracked by GPS, your location will always be shared. By doing this you may be giving others an intimate overview of your habits and patterns. This could include sensitive data such as: visits to hospitals, places of worship, presence at political demonstrations or presence at locations that might reveal information about your sex life. Revealing your location could also increase your risk of burglary, physical aggression and stalking.

4. Automatically generated information

Like most other websites and apps, PlanetRomeo gathers and processes automatically generated information about how you use our Service. This also occurs if you visit our Website without logging in to an Account. The information gathered includes among other things your IP-address or the identifier of your device, your browser type (the program or app you use for viewing internet pages) and the display resolution of your computer screen or mobile device. This kind of information helps us to better understand how our Service is used, to facilitate its usability, and how we can improve it to suit the needs of our Users.

5. Additional requested information

PlanetRomeo may request additional information from you to verify information you have posted on your Account or Profile.

## 2. Cookies

1. What are cookies?

Like most other websites and apps, PlanetRomeo uses cookies. A cookie is a simple text file that is stored on your computer or mobile device by a website's server and only that server will be able to retrieve or read the contents of that cookie.

2. Cookies used by PlanetRomeo

a. Essential functional cookies

PlanetRomeo uses essential functional cookies that are strictly necessary for the functioning of the Website and for the provision of services explicitly

requested by you, the User. These cookies are used for services such as keeping you logged in to the Website, letting you navigate between pages efficiently, remembering your username, settings/preferences and other input. They also generally improve your experience of our Service.

**b. Cookies for effectivity and analytics**

PlanetRomeo uses cookies to get information about the quality or effectiveness of its Website through the use of Piwik Analytics, which are so-called 'first party analytics cookies'. The use of these cookies is strictly limited to PlanetRomeo's aggregated statistical purposes.

PlanetRomeo also uses Google Analytic for planetromeo.com and its related subpages. These are so-called 'third party analytics cookies', through which we get information about how users interact with these pages.

Google's privacy policy applies to the way they collect, use and disclose your information. You may review it at: <http://www.google.com/policies/technologies/ads/>, and <http://www.google.com/policies/privacy/>.

**c. Tracking cookies**

While using the Website, our ad server, Google DoubleClick, can store tracking cookies on your device. These are used to build up a profile of your advertisement banner clicking behavior. This is an anonymous profile, unless you are signed in to Google. In that case, this information might be associated with your Google account. Google provides instructions of how to opt-out of interest-based advertising from Google here: <https://support.google.com/ads/answer/2662922?hl=en> For more information on Google's privacy policy: <http://www.google.com/policies/privacy/>.

While using our App, our ad networks (see listing below) can use so-called device identifiers to build up an anonymous profile of your online banner clicking behavior. On our App, we work with several mobile advertising partners, which may include but is not limited to the following (along with a link to their current privacy policy and an option to opt-out of interest-based advertising, if available):

- MoPub (<http://www.mopub.com/legal/privacy/>)
- AdMob (<http://www.google.com/intl/en/policies/privacy/>)
- MobFox (<http://www.mobfox.com/privacy-policy/>)
- Smaato (<https://www.smaato.com/privacy/>)
- Facebook (<https://www.facebook.com/privacy/explanation>)

The above mentioned anonymous profile is not linked to your Personal Data known to us, but only serves advertisements that are as relevant as possible to you. These cookies/device identifiers can be used to serve ads based on your prior visits. This profile is also built on the basis of comparable information Google DoubleClick and other third party ad networks (as listed above) get from your visits to other websites from their network.

While using the App, Planetromeo uses Localytics through which we get the information about how the users make use of the App. For this purpose Localytics uses a device identifier to build an anonymous profile.

**3. Managing cookies**

When visiting our Website or App, your consent is requested for the storage and use of tracking cookies (type 2c).

Whether you give your consent or not, it is stored in a cookie, so that your preference is remembered for following visits.

You may visit the websites mentioned under 2c to opt-out of the use of these cookies, if the vendor or ad network offers this possibility. Alternatively, you can opt-out of some third-party vendor's use of the cookies for internet-based advertising by visiting [aboutads.info](http://www.aboutads.info) (<http://www.aboutads.info/>).

Please note that other cookies (type 2a and 2b) are stored and used automatically. If you don't want to receive these cookies, you can modify your browser or settings of your mobile device, so that it notifies you when cookies are sent to it, or you can refuse cookies altogether. You can also delete cookies that have already been set by means of your browser settings or your mobile device settings. Keep in mind, that by disabling these cookies most parts of the Service will not work.

If you're using a computer that is also used by other people, always log out from the Service using the logout link, delete cookies that have been set and close your browser window. Remember to also keep your password strictly private to prevent others from being able to use your Account.

If you wish to restrict or block cookies which are set on your device, then you can do this through your browser settings. The help function within your browser should tell you how. Alternatively, you may wish to visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org), which contain comprehensive information on how to do this on a wide variety of desktop browsers.

### 3. For what purposes does PlanetRomeo process Personal Data?

#### 1. Purpose

PlanetRomeo processes Personal Data for the following purposes:

- to enable you to use the Service
- to deliver Additional Services that you have purchased
- to keep you updated with relevant information about our Service, for example through content, promotions, surveys etc.
- to inform you about PlanetRomeo's other products or services
- to provide you with targeted advertisements
- to improve and/or customize the Service
- to identify and prevent fraud
- to provide support
- to verify information posted on your Account or shared by you via the Website
- to pass your Personal Data to third parties, if we are obliged to do so by law

#### 2. Use of Personal Data by PlanetRomeo

PlanetRomeo will process the Personal Data you provided to enable you to create an Account and Profile and to use our Service. PlanetRomeo may also use your email address to send you information and updates about your purchases.

PlanetRomeo aims to keep you informed of any changes to its Services, or similar products or services. PlanetRomeo will use your Personal Data to notify and/or email you regarding these changes, products or services. Please be aware that you will also receive emails and/or notifications from PlanetRomeo concerning the proper functioning of your Account.

PlanetRomeo allows you to interact and communicate with other Users. For instance, you can share content or your location. If you have unread messages on your Account and you have not read them within two weeks, PlanetRomeo may remind you about these messages. You can also 'opt-in' to receive an email notification every time a message is sent to you via the Service, by ticking the box for the "Offline Notification" available in your Account.

PlanetRomeo may use User Content that Users have chosen to make publicly visible and available only for internal marketing purposes on the Website or App (like highlighting new profiles on the Start-page or Top Footprints). The marketing is therefore limited to the Website and App and only pertains to PlanetRomeo itself. PlanetRomeo will never use non-public User Content for these limited marketing purposes. The User Content will not be used for marketing of third parties.

When you write to PlanetRomeo with an enquiry, request or question, you may choose to include some Personal Data. Such communications and any additional data supplied will be stored by PlanetRomeo. PlanetRomeo may use your email address to reply to you and your Personal Data may also be used to help us improve or respond more effectively to your customer service requests and support needs.

PlanetRomeo may request additional information from you to verify Personal Data or other information posted on your Account, on your Profile or that you have otherwise shared via the Service. Based on this information, PlanetRomeo may, at its sole discretion, decide to remove certain Personal Data or information and/or to suspend your use of the Service or terminate your Account.

### 3. Transmission of Personal Data to third parties

PlanetRomeo does not sell, trade or rent your Personal Data to third parties without your prior consent.

PlanetRomeo can provide your Personal Data to third parties, when this is essential for providing the Service and/or Additional Services to you or for carrying out your instructions.

If you choose to purchase Additional Services such as a PLUS subscription, you will need to fill in your payment details in the appropriate fields provided by Acapture. PlanetRomeo does not receive, process or store these financial data, such as credit or debit card data, or bank account information. In case you choose a recurring subscription, PlanetRomeo only stores the expiry date of your credit card.

The financial details you provide will be processed by Acapture as our processor on our behalf, only with the sole purpose of completing the financial transaction. These financial details will only be passed on to financial institutions who are involved in the chosen transaction (eg. your bank or

credit-card company). Acapture will not pass on any financial details to other third parties, because any applicable laws strictly prohibit this. Acapture will only disclose data in case this is (a) statutory obligation, an order of a court of competent jurisdiction or an order of a competent regulatory body. For more information about Acapture, and its security, visit [www.acapture.com](http://www.acapture.com).

PlanetRomeo may provide “aggregated anonymous data” about the usage of the Service to third parties for such purposes as it deems to be appropriate. “Aggregated anonymous data” is data that cannot be traced back to you and which therefore does not count as Personal Data. For instance, PlanetRomeo may use aggregated anonymous data to better understand how you and other Users use the Service.

In the event that PlanetRomeo (or any parts of it) are transferred to a third party, or that PlanetRomeo merges with a third party, or undergoes reorganization, your Personal Data may also be disclosed and/or transferred to that third party. This third party will have the right to continue to use Personal Data and other information that you provided to PlanetRomeo.

PlanetRomeo may disclose your Personal Data where it believes, in good faith, that it is necessary to comply with a court order, ongoing judicial proceeding, criminal or civil subpoena, or other legal process or request by law enforcement authorities in the Netherlands, or to exercise its legal rights or defend itself against legal claims.

## 4. What security measures are in place to protect Personal Data?

The security of your data and that of other Users is very important to PlanetRomeo. We have implemented technical and organizational measures to protect your Personal Data against loss or any form of unlawful processing. PlanetRomeo stores Personal Data on servers with limited access. These servers are located in secured buildings.

PlanetRomeo offers SSL encrypted access. Using SSL, the data exchange between your personal computer or mobile device and PlanetRomeo’s server is protected with up to 256-bit encryption to help prevent unauthorized parties from being able to intercept and read your data. SSL encryption is always activated during the login process. After logging in, the site reverts to being unencrypted. Users who activate SSL get encryption for the whole Website. If you wish to use SSL, click “Activate SSL” on the login page. Alternatively you can use one of our URLs by using ‘https://’ instead of ‘http://’.

It is your responsibility to protect the security of your Credentials. Please note that emails, instant messages and other means of correspondence are not necessarily encrypted. PlanetRomeo strongly advises you not to communicate any confidential information through emails, instant messages or other means of correspondence.

## 5. Limits of responsibility concerning third parties

Our Service may contain services offered by third parties. There may also be advertisements or content containing hyperlinks to the websites or services of partners, advertisers and other third parties. An example of this is PlanetRomeo health support.

PlanetRomeo has no control or influence over the content, websites or services of these third parties. Different privacy policies may apply to the use of third party websites and services. This Privacy Statement only relates to Personal Data which has been obtained by PlanetRomeo through your use of the Service. PlanetRomeo does not accept any responsibility or liability for the content, practices or operation of third party websites and services.

When you use our Service, you are responsible for the Personal Data and information about yourself that you choose to share with others via the Service. PlanetRomeo does not accept any responsibility or liability in this regard.

## 6. Viewing and changing Personal Data

You can always view, edit or delete the Personal Data in your Account. You can also change the visibility settings of your Personal Data in your Account.

If you want to know what Personal Data PlanetRomeo has stored about you, you can contact PlanetRomeo, with reasonable frequency, by sending an email to [support@planetromeo.com](mailto:support@planetromeo.com). PlanetRomeo will send you an overview of all your stored Personal Data within four weeks.

After receipt of this overview, you may request PlanetRomeo to correct, supplement, delete or block Personal Data that is factually incorrect, incomplete or irrelevant for the purpose of processing, or if the data is in violation of a legal provision. PlanetRomeo will inform you within four (4) weeks whether it will comply with your request.

If you wish to delete your entire Account you can do so in your Account on [www.planetromeo.com](http://www.planetromeo.com) and in the App.

After deletion of your Account, PlanetRomeo may store your Personal Data and Account for a further period of time for a number of reasons, including but not limited to legal obligations concerning the retention of accounting information and the prevention of malicious actions resulting from identity theft or other offences or crimes such as fraud. Deleted Personal Data and Accounts are only accessible to PlanetRomeo and cannot be accessed by any users of the Service. All retained Personal Data continues to be subject to this Privacy Statement.

## 7. Changes to this Privacy Statement

PlanetRomeo can update this Privacy Statement at any time. PlanetRomeo will publish the updated version of the Privacy Statement via the Service. PlanetRomeo encourages you to check this page from time to time to be aware of any changes to this Privacy Statement and to stay informed about how PlanetRomeo protects your Personal Data. You acknowledge and agree that it is your responsibility to review this Privacy Statement periodically and familiarize yourself with any updates.

## 8. Applicable law and competent court

This Privacy Statement is governed by and construed in accordance with the laws of the Netherlands. All disputes resulting from or arising out of this Privacy Statement shall be dealt with in accordance with the Terms of Use.

## 9. What to do if you have any questions or remarks

If you have any questions or remarks about PlanetRomeo's Privacy Statement, please contact PlanetRomeo via the Website or by sending an email to [legal@planetromeo.com](mailto:legal@planetromeo.com).

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