



Privacy Policy



Hiway b.v. ("Hiway", "Company", "Platform", "we" or "us") respects the privacy of the visitors of its Site (available at: <https://hiway.io>) and/or users of its Service (as broadly defined in our TOS) ("User" or "you") and is committed to protecting the personal information that its Users share with it. We believe that you have a right to know our practices regarding the information we may collect and use when you visit and/or use our Service.

Capitalized terms which are not defined herein, shall have the meaning ascribed to them in our Terms of Service, available at [Hiway.io](https://hiway.io) ("TOS"), into which this Privacy Policy is incorporated thereto by reference.

Controller Details:

Hiway b.v.
Kerkenbos 1075V
Nijmegen, 6546BB
The Netherlands

Contact email address: support@hiway.io

A short summary of our privacy protection principles

Your personal data will be used by us and our processors for the purposes of providing you with the Services and improving them. We are not in the business of selling your data.

We respect your rights to control your data, and therefore support your choices over your data, including portability, edit, and rectification of your personal data we use 3rd party processing vendors to help us retain, process and secure your data, and ensure they meet strict regulatory standards.

You can always reach out to our privacy compliance team, at support@hiway.io if you have any question or find anything unclear in this privacy policy



1. Your consent

BY ENTERING, CONNECTING TO, ACCESSING OR USING THE SITE, THE PLATFORM AND/OR THE APP (INCLUDING BY INSTALLATION OF OUR APP) OR ANY RELATED SERVICES, YOU AGREE TO THE TERMS AND CONDITIONS SET FORTH IN THIS PRIVACY POLICY (THE "PRIVACY POLICY"), INCLUDING TO THE COLLECTION AND PROCESSING OF YOUR PERSONAL INFORMATION (AS DEFINED BELOW). IF YOU DISAGREE TO ANY TERM PROVIDED HEREIN, YOU MAY NOT INSTALL THE APP, ACCESS OR USE THE SERVICES.

FOR AVOIDANCE OF DOUBT, YOU HEREBY CONSENT TO THE COLLECTION, PROCESSING, TRANSFER, AND USE OF YOUR PERSONAL INFORMATION. YOU ALSO ACKNOWLEDGE AND CONFIRM THAT YOU ARE NOT REQUIRED TO PROVIDE US WITH YOUR PERSONAL INFORMATION AND THAT SUCH INFORMATION IS VOLUNTARILY PROVIDED TO US BUT IS ESSENTIAL FOR PROVIDING YOU WITH THE SERVICES.

2. Which information do we collect on our users?

We collect two types of data and information about our Users:

The first type of information is non-identifiable and anonymous information ("Non-personally Identifiable Information" or "Non-PII"). We are not aware of the identity of the User from whom we have collected the Non-PII. Non-PII is any unconcealed information which does not enable identification of an individual User, and which is available to us while such User is entering into and/or using the Service, and/or installing the App. Non-PII which is being collected consists of technical information, device information and general Site and Services activity information. This information includes type and version of the device you use or from which you access the Services, type, and version of your operating system and carrier (were in mobile), type and version of your browser (via your user agent parameters), keyboard language, screen resolution, User's clicks or searches on the Properties and referral URL (i.e., the website from which you arrive at our Services).

The second type of information is individually identifiable information ("Personal Information"). This information may identify an individual or may be of a private and/or sensitive nature:

Visitors of the site and/or users of the app and/or the platform automatically provide their IP address and/or advertiser identifier (when available on a mobile device) mainly for enhancing the User's experience and for geo-location and security purposes as further detailed below. Additionally, we may use the User's IP addresses over time for



anti-fraud detection and prevention.

When you sign up for our services, you are requested to submit personal information that will be used to open your account and associate it with you and your activities. Such information includes full name, address (if you submit it to your Account), jobs, education, and email address. Additional information may be requested from time to time upon the then-current need.

Personal Information is collected from the details the Users of the app and/or platform and visitors of the site insert into the “message box” via the e-mail address available on the Site. Our representative may collect additional Personal Information from you. In this case, the information will be retained separately.

Information you voluntarily provide or submit to us: the email address that you may submit via the Site for receiving updates and newsletters.

For the avoidance of doubt, any Non-PII connected or linked to any Personal Information is deemed as Personal Information as long as such connection or linkage exists or possible.

We do not collect any Personal Information from you or related to you without your approval, which is obtained, inter alia, through your active acceptance to the Terms and the Privacy Policy and through your active submission of information.

3. How do we collect information on our users?

There are two main methods we use:

1. We collect information through your entry and use of the Service and installation of the App. In other words, when you are using the Service we are aware of it and may gather, collect and store the information relating to such usage.

2. We collect information which you decide to provide us voluntarily. For example, we collect Personal Information when you register and open an Account, and/or when you subscribe to our newsletter.

We may gather, collect and store the Personal Information either independently or through the help of our authorized third-party service providers after we ensure that they meet industry security standards.



4. What are the purposes of the collection of information?

Non-PII is collected for the following purposes:

First, we need this information to be able to provide and operate the Services, so as to tackle and resolve bugs, errors and other issues that may arise from time to time
We want to better understand our visitors and Users, so we can constantly improve our Services and make them relevant.

We extract statistics and aggregations from the information, to allow better research over time, improve the quality of the Service by formulating, customizing and enhancing the User's experience and Services design.

Personal Information is collected in order to:

Enable the overall operation of the Service.

Personalize your experience on the Service and associate your activities to your Account.

Improve the quality of our Service by formulating, customizing and enhancing the user's experience, allow us to contact users with proposals and tailored information regarding new products, events, offers, services, features, enhancements, special offers, upgrade opportunities, and events of interest, etc.

Send push notifications to the User's device after the User has agreed to accept push notifications from Hiway. Users can deactivate push notification by changing their settings within the App.

Verify the User's identity when he/she signs in to our service, as well as verifying the user's identity for the purpose of dealing with inappropriate interactions of the user and/or fraudulent use of our service.

Be able to contact users for the purpose of providing them with technical assistance and support, so as safeguarding and protect your account and access to your account.

Determine general geolocation information (i.e., country and region) from which the User's computer is connected to the Internet in order for us to know the general location of our users as well as in order to safeguard our service.



5. Sharing Information with third parties

Hiway will not sell your Personal Information for commercial purposes.

Notwithstanding, Hiway may share Personal Information in the following cases and for the following purposes with third party processing and storing vendors that help us facilitating the Services, securing them and storing your data. You can refer to Section 9 to get more information about such vendors;

to collect, host and/or manage your Personal Information through Hiway's authorized third parties service providers (including, as applicable, their affiliates as necessary to provide us with the requested services), as reasonable for business purposes, which may be located in a country that does not have the same data protection laws as your jurisdiction;

to store or process your Personal Information through Hiway's affiliated companies, which may be located in a country that does not have the same data protection laws as your jurisdiction;

to enforce this Privacy Policy and/or the TOS, or to conduct investigations of potential violations thereof;

to detect, prevent, or otherwise address fraud, security or technical issues;

to respond to User's support requests;

to respond to claims that the Properties' activity or any Content violates third-party rights;

to protect the rights, property, or personal safety of Hiway, its Users, or the general public;

when Hiway is undergoing any change in control, including by means of merger, acquisition or purchase of all or substantially all of its assets;

to satisfy any applicable law, regulation, legal process, subpoena or governmental request;

pursuant to your explicit approval prior to the disclosure.

For the avoidance of doubt, Hiway may use, transfer and disclose Non-PII to third parties at its own discretion.



6. Deletion or modification of personal information

If for any reason you wish to delete, update or modify your Personal Information included in your Account you may do so by clicking the “Settings” option available through the App and/or Platform. Note that unless you instruct us otherwise we may retain your Personal Information for as long as reasonably required for the purposes for which such Personal Information was collected, including without limitation, for future analytics and analysis, in order to comply with our legal or business requirements or obligations and to resolve disputes or to enforce our Terms, all as permitted under any applicable privacy laws.

Aggregated and/or anonymous information derived from your use of the Service may remain on our servers indefinitely.

Your choices – specific jurisdictions:

In addition to general rights we just described, some Users may have the following rights:

California Privacy Rights. California Civil Code Section 1798.83 permits California residents to request certain information regarding our disclosure of Personal Information to third parties. To make such a request, please send an email to support@hiway.io

EU Data Subject Rights. Any Personal Information we collect according to this Privacy Policy is handled and treated in compliance with the GDPR. As an EU based user you may:

Access the Personal Information that is kept about you (see details above). In some cases, we will need to ask you to provide us certain credentials to make sure that you are who you claim you are. If you find that the Personal Information is not accurate, complete or updated, then please provide us the necessary information to correct it. Contact us if you want to withdraw your consent to the processing of your Personal Information request to delete or restrict access to your Personal Information. If you exercise one (or more) of the above-mentioned rights, in accordance with the provisions under the law, you may request to be informed that third parties that hold your Personal Information, in accordance with this Privacy Policy, will act accordingly. Ask to transfer your Personal Information in accordance with your right to data portability.

Object to the processing of your Personal Information for direct marketing purposes
May lodge a complaint with a data protection supervisory authority.



7. Minors

The Properties are intended for Users over the age of eighteen (18). Therefore, Hiway does not intend and does not knowingly collect Personal Information from children under the age of eighteen (18) and does not wish to do so. We reserve the right to request proof of age at any stage so that we can verify that minors under the age of eighteen (18) are not using the Properties. If we learn that we collected Personal Information from children under the age of eighteen (18) we will delete that information as quickly as possible. Please contact us at support@hiway.io if you have reasons to suspect that we collected Personal Information from children under the age of eighteen (18) and we will delete that information as quickly as possible.

8. Security

We take reasonable measures to maintain the security and integrity of our Service and User information and prevent unauthorized access to it or use thereof through generally accepted industry standard technologies and internal procedures. We use a reputable and high standard third party vendor and make sure to separate your sensitive data from more general personal data. Please note, however, that there are inherent risks in transmission of information over the Internet or other methods of electronic storage and we cannot guarantee that unauthorized access or use of your Personal Information will never occur.

HIWAY SHALL NOT BE RESPONSIBLE OR LIABLE FOR UNAUTHORIZED ACCESS, HACKING, OR OTHER SECURITY INTRUSIONS OR FAILURE TO STORE OR THE THEFT, DELETION, CORRUPTION, DESTRUCTION, DAMAGE, OR LOSS OF ANY DATA OR INFORMATION.

9. Third-party service providers

We may be using third party software or service in order to collect, host, store and/or process the information detailed herein. Hiway uses commercially reasonable efforts to engage with third parties that post a privacy policy governing their collection, processing and use of non-personal and personal information. However, we do not control such third-party service providers, but we do oblige them to contractually commit to the highest standard of compliance with privacy protection and data security laws. Please read their terms of use and privacy policies to better understand their privacy practices.

10. Links to third-party websites

Most of the third party sites or other resources that are made available via our Service provide legal documents, including terms of use and privacy policy, governing the use



thereof. It is always advisable to read such documents carefully before using those sites and services, inter alia, in order to know what kind of information they are collecting.

11. Direct marketing

In addition to any consent method that will be available to you via the Services, you hereby agree that we may use your contact details you provided us with (including, without limitation, email address) for the purpose of providing you updates, news, notices and materials related to our current and/or future products and services of Hiway. You may withdraw your consent any time by clicking the “unsubscribe” option that is made available to you in any email communication that is not essential to the operation of the Services.

12. Cookies and other tracking technologies.

When you access or use the Service, we or our third-party service providers may use industry-wide technologies such as “cookies” or other similar technologies that store certain information on your device or your general use of the Site (“Cookies”). This allows us to enable automatic activation of certain features and make your experience much more convenient and effortless. We or our authorized third-party service providers may use both session cookies (which expire once you close the Service) and persistent cookies (which stay on your system until you delete them). It is easy to disable or delete Cookies. Most browsers will allow you to erase cookies from your computer’s hard drive, block acceptance of cookies, or receive a warning before a cookie is stored. However, if you disable or erase cookies, your online experience may be limited. Cookies usually store only Non-personal Information, such as the web pages you have visited, the duration of your browsing, etc. Hiway does not control such third-party service providers.

13. International data transfer

We transfer information collected about you, including Personal Information, to affiliated entities, or to other third-party service providers across borders and from your country or jurisdiction to other countries or jurisdictions around the world (all solely for legitimate business purposes). Please note that we may transfer such information to a country and jurisdiction that does not have the same data protection laws as your jurisdiction, and you consent to such transfer of information. Such jurisdictions are the US and the EU/EEA.

14. Changes to the privacy policy

The terms of this Privacy Policy will govern the use of the Services and Platform and any information collected therein. Hiway reserves the right to change this policy at any time, so please re-visit this page frequently. We will provide notice of substantial



changes of this policy on the homepage of the Platform and/or we will send you an e-mail regarding such changes to the e-mail address that you may have provided us with. Such substantial changes will take effect seven (7) days after such notice was provided on our Platform or sent by e-mail, whichever is the earlier. In the event that the Terms should be amended to comply with any legal requirements, the amendments may take effect immediately, or as required by law and without any prior notice.

15. Got any questions?

If you have any questions (or comments) concerning this Privacy Policy, you are most welcome to send us an email to the following address at support@hiway.io