



DATA SUBJECT: Mr Martin Gundersen

Received by: Electronic means

Email: martin.a.gundersen+gdpr@gmail.com

On the 11th August 2020,

Dear Mr Gundersen,

We write in response to your Data Subject Access Request made under Article 15 of the EU General Data Protection Regulation (Regulation (EU) 2016/679) (hereinafter the “**GDPR**”) as well as your Data Portability Request made under Article 20 of the GDPR; which we both received on **12th July 2020**.

1. DATA SUBJECT ACCESS REQUEST

Article 15 of the GDPR grants you the right to access your personal data held by Predicio, including the right to obtain confirmation that we process your personal data, receive certain information about the processing of your personal data, and obtain a copy of the personal data we process.

After conducting a diligent search for records relating to your access request, we can confirm that between February 2020 and July 2020, we have processed the following categories of personal data about you:

Category of personal data	Purpose(s) of the processing	Legal basis for the processing	Personal data retention period
Data Identifiers: MAID (Android)	1. Provide our services to publishers, advertisers or other selected third parties to help them get an understanding of how you are using our partners’ mobile applications. 2. Allow selected third parties to	Opt-in consent you provided to our partner Sygić a.s for the processing of your personal data by third party advertisers (please see “Information about the source of the personal data” below)	Data Identifiers and Technical Data are kept on our servers for a period of 12 months for the necessary purpose of providing Predicio’s clients with relevant analytics data . In any event, we will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for , including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the
Technical Data: timestamp,aid,latitude ,longitude,horizontal_ accuracy,altitude,altitude_ accuracy,method,I P,os,os_version,manufacturer,model			

	<p>provide you with tailored services and the display of customized content and targeted advertising.</p>		<p>event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.</p> <p>To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes we process your personal data for and whether we can achieve those purposes through other means, and applicable legal requirements.</p>
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In addition, as per our obligations under Article 15 of the GDPR, we have compiled below a list of information with respect to the personal data mentioned above which we process about you:

Recipients who receive your personal data from us:	We did not disclose your personal data to any third parties, whether it is inside or outside of France between February 2020 and July 2020.
Your rights:	<p>In addition to your access right, the GDPR also grants you the right to:</p> <ul style="list-style-type: none"> - Request correction or erasure of your personal data. - Restrict or object to certain types of data processing. <p>For more information on your rights granted under the GDPR, please see Predicio's Privacy Notice which is available at http://www.predic.io/privacy.</p>
Lodging a complaint:	Despite our diligence in replying to your requests, if you nonetheless consider that we did not take action in response to both of your requests, please note you have the right to lodge a complaint with the relevant supervisory authority and seek a judicial remedy.
Information about the source of the personal data:	The personal data we hold about you was not obtained from you. It was obtained from our partner Sygic a.s. , with which we have a valid controller to controller data agreement in place, on the basis of the opt-in consent which you provided to Sygic a.s. for the processing of your personal data by third party advertisers.

	<p>Contact details for Sygic a.s. are as follows:</p> <table border="1"> <tr> <td data-bbox="523 293 794 497">Address:</td> <td data-bbox="794 293 1423 497">Sygic a.s. Twin City C, Mlynské Nivy 16, 821 09 Bratislava Slovak Republic</td> </tr> <tr> <td data-bbox="523 497 794 566">Registered in:</td> <td data-bbox="794 497 1423 566">The Commercial Register of the District Court Bratislava I, section: Sa, File No. 4893/B</td> </tr> <tr> <td data-bbox="523 566 794 636">Identification No.:</td> <td data-bbox="794 566 1423 636">35 892 030</td> </tr> <tr> <td data-bbox="523 636 794 705">Company ID:</td> <td data-bbox="794 636 1423 705">35 892 030</td> </tr> <tr> <td data-bbox="523 705 794 775">VAT ID:</td> <td data-bbox="794 705 1423 775">SK2021849005</td> </tr> <tr> <td data-bbox="523 775 794 844">Email:</td> <td data-bbox="794 775 1423 844">urgentsupport@sygic.com</td> </tr> <tr> <td data-bbox="523 844 794 913">Tel.:</td> <td data-bbox="794 844 1423 913">02/ 3211 5350</td> </tr> <tr> <td data-bbox="523 913 794 945">Fax:</td> <td data-bbox="794 913 1423 945">02/ 5244 4216</td> </tr> </table>	Address:	Sygic a.s. Twin City C, Mlynské Nivy 16, 821 09 Bratislava Slovak Republic	Registered in:	The Commercial Register of the District Court Bratislava I, section: Sa, File No. 4893/B	Identification No.:	35 892 030	Company ID:	35 892 030	VAT ID:	SK2021849005	Email:	urgentsupport@sygic.com	Tel.:	02/ 3211 5350	Fax:	02/ 5244 4216
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Fax:	02/ 5244 4216																
Existence of automated decision-making:	We do not use your personal data for solely automated decision-making or profiling.																
Transfer of your personal data outside of the EEA:	<p>We did not transfer your personal data outside of the EEA between February 2020 and July 2020.</p> <p>When we do transfer personal data outside of the EEA, we require our business partners based within the European Union or processing personal data from European Union citizen to ask end users to provide their consent to the storage, processing, and transfer of their personal data in and to countries outside the EEA.</p>																

Finally, we are pleased to enclose a copy of the personal data listed above which we hold about you in the following file for your review:



Your Personal data
held by Predicio.xlsx

2. DATA PORTABILITY REQUEST

Article 20 of the GDPR grants you the right to receive a copy of certain personal data that you provided to Predicio and the right to transfer that personal data to another organisation, if we use automated means to process the personal data and if we either:

- Process the personal data with your consent.
- Process the personal data because it is necessary for us to perform a contract with you.



The data portability right does not apply to personal data we hold in paper files. It also does not apply to data inferred by or derived by us from the data provided by data subjects such as data we generate by analysing data subjects' personal data.

After conducting a diligent search for records relating to your data portability request, we have determined that the personal data you requested a copy of is not subject to Article 20 because:

- 1. you did not provide the personal data to us; and**
- 2. we do not process personal data for purposes that require us to identify you.**

Please note that the information we hold about you and which we provided above at paragraph 1 were able to be retrieved solely based on the additional information which you directly provided to us within your requests made on 12th July 2020 (these being **your name, your surname, your android Advertising ID and your mobile phone model number**).

As a result, we would not normally be able to identify you or your personal data under usual circumstances.

If you have any additional questions, please contact our Data Protection Officer ("DPO") at legal@predic.io.

Best regards,

SEBASTIEN RIGOIGNE

For and on behalf of PREDICIO