

In case of contradiction, the [Spanish version](#) has prevalence

1.1 INFORMATION THAT TWONAV COLLECTS AND RECEIVES

TwoNav may collect personal information as you use the Service. You are under no contractual obligation to provide any information. However, some information is collected automatically, and if some information is not provided we may not be able to provide the Service.

1.2 ACCOUNT

When you register with TwoNav we collect your email address, name and surname. We collect this to uniquely identify you within the TwoNav service, enabling you to sign in and use multiple devices, to view and manage the content you have downloaded and created.

We collect the country and language reported by your mobile device or web browser, so that we can communicate with you and show appropriate content.

You may choose to personalise your account by entering your nickname, providing a photo, gender, birthdate, town, and providing information on your interests.

1.3 DEVICE

TwoNav identifies your mobile device using an identifier unique to TwoNav.

TwoNav also collects the name, model and operating system of your device. This is to enable you to identify the device in your account, to assist us when communicating with you, and to link with the correct app store services.

1.4 CONTENT

You may choose to create content within TwoNav. This includes recording a track (a recorded journey, a history of positions and times);

plotting a route (a planned journey); plotting a point of interest; adding a photograph.

You control whether tracks are public or private, so visible to others or not.

You can choose to publish a route, in which case it becomes public, and other people can view or download a copy. The route may be embedded in third party websites via the use of 'widgets', or be available to use on carefully selected third-party services.

If you use the Amigos/SeeMe feature, your live locations are received and stored in TwoNav, and can be seen by those with whom you choose.

You can choose to add photographs to routes and tracks.

1.5 PURCHASES AND CONTENT USE

Purchases of maps are handled by your device's app store, and TwoNav collects no personal details from those app stores.

If you buy maps or credit from our shop website, we collect your name, email address, address and other information you may enter.

For all purchases TwoNav stores the order number, product identifier, time of purchase and price, so that we can fulfill the order, display an account history, and provide a subscription service or content re-download.

Use of online maps is recorded to enable us to monitor and report aggregated and anonymised service usage.

We do not directly handle payment card details. Payments are handled by the device's app store, or by our card payment service providers (Stripe).

If you purchase through the TwoNav web site, payment details are handled by the Stripe payment service. In order to provide recurring subscriptions, or if you switch on the 'Save Card' option at the checkout process, Stripe will store your card details. You can delete these stored details from the 'Pay' section at the checkout process.

Payment details for purchases within the app are handled by the Play Store or App Store, and can be accessed through the account section of those Store apps. Those payment details are never accessible to TwoNav.

1.6 LOCATION

Content you create - routes, tracks, points of interest, map selections - contains location data and can contain time data.

If you add photos to tracks, the photo may contain an embedded location, which is used to show the location of the photo on a map.

If you set the Amigos/SeeMe service, the locations and times you send are recorded in order to be shared with your selected contacts following your settings.

When you use the website, to display content relevant to your location, we ask your browser for a location, or lookup the approximate location of your Internet Protocol (IP) address using a service private to TwoNav.

When you browse for routes in the application or website, we receive the location of the map centre to allow us to show content relevant to that location.

Your device asks for your consent before TwoNav first uses location, and you can withdraw that consent at any time via the device's Settings app.

1.7 LOG DATA

As with most Internet-delivered services our servers automatically collect information when you access the TwoNav Service, and record it in log files. The log data may include the Internet Protocol (IP) address; the addresses of both the page visited and the previous page; detail of the service used; browser or device type and settings; date and time the services were used; information about the browser or device configuration; language; and cookie data.

If the application encounters an error where it closes unexpectedly (a crash), we may record a crash log.

1.8 SERVICE ACCESS

We record the dates on which you access the service, and the method and time of last access. This is anonymously aggregated for us to monitor and report on the usage of the service. Individual records of last access may be used when answering support queries, and may also be used to determine when to communicate with you.

1.9 ANALYTICS

We record analytics both within TwoNav and using third party services, such as Google, to enable us to understand how TwoNav is used, identify the origin of an app installation, and to improve the Service. Depending on your device or browser privacy settings, those analytics may collect your advertising identifier. The analytics may also record technical data about your device or browser. The analytics private to TwoNav may be used to trigger help and advice communications.

We may share anonymised network signal data with a partner, for the purpose of cell network improvement.

To help us improve TwoNav, the application will occasionally record your use of the application.

1.10 COOKIE DATA

You may choose to link TwoNav with other accounts, such as Strava, Training Peaks, Komoot, Suunto, Google, Dropbox, or Twitter, because you wish to benefit from the services they provide.

If you link your TwoNav account with a third party service, the data you enter to link the service, such as an account name, will be used to access content or services from that third party service.

Where the link provides media such as photos and tweets, those will be marked and visible on your public tracks.

Your use of those third party services is covered by the privacy policies of those services.

1.11 OPERATING SYSTEM

The TwoNav applications use a range of services built into the device, and those services may have access to personal data, covered by the device's own Privacy Policy.

1.12 CONTACT INFORMATION

If you contact TwoNav with a query, the contact information you provide will be recorded within the TwoNav Helpdesk.

1.13 HOW WE USE INFORMATION

We use your personal information to provide the TwoNav Service to you.

We store your content, so you can access it across your devices and via the website, and so you can choose to share it.

We allow you to make some content public and to share it.

If you visit the track statistics section of the website, we analyse your tracks to report to you on your activity.

We record purchases and usage data, to report to content providers in aggregate with personal data removed.

We use your country to offer you appropriate content, such as maps.

We may also use personal information as required by applicable law, legal process or regulation; or to answer your queries; or to investigate and help prevent security issues and abuse.

2 HOW INFORMATION IS SHARED

2.1 PUBLICLY AVAILABLE INFORMATION

You control whether tracks are public or private. Public tracks may then be seen by others, and may be embedded in third party websites via the use of 'widgets'. You can control track privacy in the application using

the track details page, shown when you stop recording, or via the website.

You can choose to publish routes. They may then be seen and downloaded by others, and may be embedded in third party websites via the use of 'widgets', or be available to use on carefully selected third-party services.

The Amigos/SeeMe is protected so other users can not find your information, unless you choose to share it publicly or with selected users.

If routes that you publish, or tracks that you share, link to photos, those photos will also be publicly visible.

2.2 SERVICE PROVIDERS

We may share your information with third parties who provide services to TwoNav. These service providers will only have access to the information necessary to provide limited functions on our behalf. They are required to keep your information secure.

When you access some maps and services, the service provider will know the IP address, and other browser details or that these maps are being accessed from TwoNav, but nothing to match those with you personally.

2.3 AGGREGATED AND ANONYMISED INFORMATION

We may aggregate and anonymise your data, to provide statistical data such as route and path usage. We may sell, license or share this information.

2.4 COMMUNICATIONS AND PRIVACY SETTINGS

As well as messages shown within the TwoNav application and websites, we may communicate with you by email or notification.

We only send you marketing communications promoting paid maps, other TwoNav products or relevant partners' products, if you have opted in to receive those messages.

As part of the TwoNav Service we send a range of communications, such as help and advice, reminders, and news of new free content. You can opt out of these communications.

You can control all TwoNav email and notifications in the TwoNav website, at the 'my Data' section, or using the unsubscribe link at the foot of every email.

The TwoNav Service may display advertisements of TwoNav products.

2.5 LEGAL BASIS AND OUR LEGITIMATE INTERESTS

We will only collect and process your personal data where we have lawful bases.

Lawful bases include contract (for example to provide the TwoNav Service to you), consent, and legitimate interests (including in operating and improving the TwoNav Service and business, and in keeping the TwoNav Services safe and secure).

Where we rely on your consent to process personal data, you have the right to withdraw or decline your consent at any time. Where we rely on legitimate interests, you have the right to object.

If you have any questions about the lawful bases on which we collect and use your personal data, please contact our Data Protection Officer, contact details below.

2.6 DATA RETENTION

Your content and personal data are retained while your account remains open. In many cases you can choose to remove individual items of content or data.

Log and analytics data will be removed after various time periods.

2.7 YOUR RIGHTS

Deletion and Right to be Forgotten

You can ask us to delete your account and all your personal data by contacting . The request will be actioned within 30 days.

Some data will become anonymous or de-identified once the account is removed. That data may be kept and used in aggregate to report on the service and business performance. For example, anonymised purchase and usage records must be retained for reporting purposes.

Search engines and similar services may retain a cache of any content that you made public for much longer, and these are outside our control.

If you publish a route then after your account is deleted that route remains available to people who had already downloaded it, but the route is no longer available for new downloads.

2.8 RIGHT TO ACCESS AND PORT DATA

Routes and tracks that you create can be exported to the widely-used GPX file format using the TwoNav application or website.

Points of interest can be exported using the TwoNav application.

Photographs can be managed via the Land application.

2.9 RIGHT TO CHANGE OR CORRECT DATA

Most of your personal data can be changed, corrected and deleted in your account on the TwoNav web site.

For other data you can ask us to correct your data if it is incorrect, or to delete it if it is no longer needed to provide the Service to you.

2.10 RIGHT TO OBJECT, LIMIT OR RESTRICT USE OF DATA

You can ask us to stop using some or all of your personal data, for example if we have no legal right to keep using it, or it is inaccurate, or unlawfully held.

The TwoNav website allows you to control the use of your personal data to stop its use for direct marketing.

2.11 COMPLAINTS

If you have a complaint, please contact our support team, or our Data Protection Officer, details below.

However, if you are still dissatisfied, you may contact the Data Protection Authority at the contact details below.

2.12 DATA TRANSFER TO THIRD COUNTRIES

The personal data we collect is stored and processed within the European Economic Area (EEA), but may occasionally be processed outside the EEA. We take all reasonable steps to ensure there is an adequate level of protection to your data, that only minimal information is processed outside the EEA, that your data is secure and handled in accordance with this Privacy Policy, and with the same level of protection as is required by the Privacy Shield Principles.

2.13 CHANGES TO THIS PRIVACY POLICY

TwoNav may update this policy from time to time. Regulations and standards change over time, or we may make improvements to the Service or changes to our business, which necessitate change. We will post changes to this page. If we make changes that materially alter your rights, we will provide an additional prominent notice.

If you disagree with changes to this privacy policy, contact TwoNav support to have your account and data deleted.

2.14 DATA PROTECTION OFFICER

Contact the TwoNav Data Protection Officer via .

2.15 IDENTIFYING THE DATA CONTROLLER AND PROCESSOR

The Data Controller and Processor is CompeGPS team SL, using the TwoNav commercial brand, based in Spain.

2.16 DATA PROTECTION AUTHORITY

The data protection authority is the Spanish Data Protection Agency (AEPD, Spanish: Agencia Española de Protección de Datos), <https://www.aepd.es>

2.17 CONTACTING TWONAV

If you have any questions about this Privacy Policy or TwoNav's practices, or if you wish to exercise any of your statutory rights, please contact us at or at our office:

- COMPEGPS TEAM S.L.
- C/ Draper 13 08350, Arenys de Mar, Barcelona (Spain)