

PRIVACY POLICY

Last updated: September 22, 2025

This Privacy Policy concerns the processing of personal data of natural persons – users of the Application – in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

This Privacy Policy describes our policies and procedures regarding the collection, use, and disclosure of your personal data when using the Service and informs you of your privacy rights and how the law protects you.

We use your personal data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this Privacy Policy.

Interpretation and Definition

Interpretation

Terms with an initial capital letter have meanings defined under the following conditions. These definitions shall have the same meaning regardless of whether they appear in singular or plural form.

Definitions

For the purposes of this Privacy Policy:

- **User Account:** A unique account created for you to access our Service or parts thereof.
- **Affiliate:** Any entity that controls, is controlled by, or is under common control with another entity, where “control” means ownership of 50% or more of the shares, equity interests, or other securities entitled to vote for election of directors or other managing authority.
- **Company** (referred to as “the Company”, “we”, “us” or “our”): Terraverse, s.r.o., with its registered office at Na Příkopě 583/15, 110 00 Staré Město, Prague 1, Czech Republic, Company ID No. 19610076, VAT ID No. CZ19610076 – registered in the Commercial Register maintained by the Municipal Court in Prague, Section C, Insert 389150.
- **Application:** The SmartCube software provided by the Company.

For the purposes of the GDPR, the Company is the data controller.

- **GDPR:** General Data Protection Regulation (Regulation (EU) 2016/679).
- **Cookies:** Small text files stored on your device by websites. They contain, among other things, information about your behavior on the website.



- **Country:** Czech Republic
- **Data Controller:** A legal entity (the Company) which alone or jointly determines the purposes and means of processing personal data, within the meaning of the GDPR.
- **Device:** Any device that can access the Service, such as a computer, mobile phone, or tablet.
- **Personal Data:** Any information relating to an identified or identifiable natural person.

For the purposes of the GDPR, Personal Data includes, in particular: name, surname, email address, identification number, location data, online identifier, or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that person.

- **Service:** The website provided by the Company.
- **Data Processor:** A natural or legal person that processes personal data on behalf of the Company. Typically, this includes third parties providing the Service or analytics services.

Under the GDPR, service providers are considered data processors.

- **Usage Data:** Data collected automatically when using the Service or its components (e.g., duration of website visit).
- **Website:** SmartCube, accessible at <https://smartcube.terraceverse.info>.
- **You:** The natural person using the Service, or the legal entity on whose behalf the natural person uses the Service.

In accordance with the GDPR, you may be referred to as the data subject or user.

Collection and Use of Your Personal Data

Types of Data Collected

Personal Data

While using our Service, we may ask you to provide certain personally identifiable information that can be used to contact or identify you. Personally identifiable information may include, but is not limited to:

- Email address
- First and last name
- Phone number
- Address, state/province, ZIP/postal code, and city

Usage Data

Usage Data is collected automatically when using the Service.

This data may include, for example:

- Your device's IP address



- Browser type and version
- Pages visited within our Service
- Date and time of visit
- Time spent on individual pages
- Unique device identifiers
- Other technical and diagnostic data

When accessing the Service via a mobile device, we may also automatically collect additional information, including but not limited to:

- Type of mobile device
- Unique ID of the mobile device
- Mobile device IP address
- Mobile operating system
- Type of mobile Internet browser
- Unique device identifiers
- Other technical performance and usage data

We may also log information sent by your browser whenever you visit our Service, including when accessing it via a mobile device.

Tracking Technologies and Cookies

We use cookies and similar tracking technologies to monitor activity on our Service and store certain information. The tracking technologies used may include web beacons, tags, and scripts to collect data, track user behavior, improve performance, and analyze the Service. Technologies used include, but are not limited to:

- **Cookies:** Small text files placed on your device. You can configure your browser to refuse all cookies or to notify you when a cookie is being sent. However, if you refuse cookies, some parts of the Service may not function properly. Unless you have adjusted your browser settings to refuse cookies, our Service may use cookies.
- **Web Beacons:** Certain parts of our Service and emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, or single-pixel gifs). These allow, for example, tracking the number of users who have visited a particular page or opened an email, and are used for analytics, system diagnostics, and server integrity checks.

Types of Cookies and Their Purpose

Cookies are categorized as either **session** cookies or **persistent** cookies:

- **Session Cookies** are deleted when you close your browser.



- **Persistent Cookies** remain on your device after your browsing session ends.

Within our Service, we use the following types of cookies:

Essential / Strictly Necessary Cookies

- **Type:** Session Cookies
- **Provider:** Us
- **Purpose:** These cookies are essential for providing core website functionality. They help authenticate users and prevent account misuse. Without them, the requested services cannot be provided.

Consent Management Cookies

- **Type:** Persistent Cookies
- **Provider:** Us
- **Purpose:** These cookies identify whether you have consented to the use of cookies on our website.

Functional Cookies

- **Type:** Persistent Cookies
- **Provider:** Us
- **Purpose:** These cookies allow the Service to remember your preferences, such as language or login credentials, making your experience more personalized and convenient.

Analytics and Performance Cookies

- **Type:** Persistent Cookies
- **Provider:** Third Parties
- **Purpose:** These cookies are used to track website traffic and user behavior. The collected data may be associated with a pseudonymous identifier (e.g., device ID), indirectly identifying you. We may also use these cookies to test new features or content.

For more information about the cookies, we use and how to manage them, please refer to our [Cookie Policy](#) or the relevant section of this Privacy Policy.

Use of Your Personal Data

The Company may use your personal data for the following purposes:

- **To provide and operate the Service:** Including monitoring its usage and ensuring its proper functionality.
- **To manage your account:** Administering your registration and enabling access to various features of the Service available to registered users.



- **To fulfill contractual obligations:** Ensuring performance of contractual commitments, including processing purchases of products or services and other agreements made through the Service.
- **To contact you:** We may contact you via email, SMS, or other forms of electronic communication (e.g., push notifications within the Website) to provide information regarding features, products, services, or security updates, where necessary or appropriate.
- **To send marketing communications:** Providing information about news, special offers, and services similar to those you have already purchased or expressed interest in, unless you have opted out of receiving such communications.
- **To respond to user requests:** Handling and addressing your inquiries or requests.
- **For business transfers:** Your data may be used in connection with a merger, sale, restructuring, dissolution, or other transfer of part or all of the business, in which personal data may be considered part of the transferred assets.
- **For other purposes:** We may also use your data for other purposes, such as data analysis, identifying usage trends, measuring effectiveness, and improving our products, services, the Service, and the overall user experience (UX).

Sharing of Personal Data

We may share your personal data in the following circumstances:

- **With service providers (data processors):** For the purpose of analyzing the use of the Service or communicating with you. These providers operate under contractual agreements and in compliance with the GDPR.
- **In the event of a company transfer:** In the case of a merger, asset sale, investment acquisition, or business transfer, personal data may be shared with or transferred to a third party.
- **With affiliates:** We may share data with our affiliated entities. In such cases, we will ensure that those entities adhere to this Privacy Policy. Affiliates include parent companies, subsidiaries, joint venture partners, etc.
- **With business partners:** For the purpose of offering specific products and collaborating on further development, improvement, or expansion of features and support for the Service.
- **With other users:** If you share personal information in public areas of the Service (e.g., in chat or comments), such information may be visible to other users.
- **With your consent:** We may disclose your personal data for any other purpose with your explicit consent.

Retention of Your Personal Data

The Company will retain your personal data only for as long as necessary to fulfill the purposes outlined in this Privacy Policy. We will retain and use your personal data only to the extent necessary to:



- comply with our legal obligations (e.g., if we are required to retain certain data under applicable law),
- resolve disputes,
- enforce our contractual rights and policies.

The Company may also retain Usage Data for internal analysis purposes. Such data is typically retained for a shorter period unless it is used to enhance security or functionality of the Service, or if a longer retention period is required by law.

How Long Are Personal Data Processed?

Personal data are processed only for as long as necessary to achieve the specific purpose.

Lawfulness and Purpose of Personal Data Processing	Strictly Necessary Duration
Performance of a contract	For the duration of the contract and the existence of the relevant user account. The respective user has the right to delete the account at any time.
Compliance with legal obligations	For the period specified by applicable legal regulations.
Responding to your inquiry submitted by phone or email	For the time necessary to respond to the inquiry, but no longer than 7 days.
Protection of legitimate interest	For a period not exceeding the applicable limitation period (3 years from the date the relevant right arises).
Processing of IP address	For a maximum of the duration of the contract and the existence of the relevant user account.

Transfer of Your Personal Data

Your personal data may be accessed by employees of the Data Controller who are bound by confidentiality obligations under employment or other contractual agreements with the Controller.

Personal data may also be shared with service providers (i.e., data processors) under contractual agreements with the Controller – typically providers of IT services, developers, IT administrators, or cloud solution operators.

The current provider of cloud infrastructure is Microsoft Azure, with servers located in the Federal Republic of Germany.

The list of such entities may change. You have the right to request information at any time from the Controller about which specific persons or entities have access to or may access your personal data.

If personal data are processed by third parties, such processing is always based on a data processing agreement in accordance with Article 28 of the GDPR, concluded between the Controller and the relevant processor.



Your personal data may also be disclosed to public authorities where required by applicable law.

The Company implements all reasonable technical and organizational measures to ensure that your personal data are handled securely and in accordance with this Privacy Policy. Transfers of personal data abroad occur only when the destination country or organization provides adequate safeguards to ensure the security and confidentiality of the data.

Deletion of Your Personal Data

You have the right to request the deletion of your personal data or to request our assistance in doing so. Our Service may allow you to delete certain data directly through the user interface.

You may also update, modify, or delete your data at any time by logging into your account (if you have one) and accessing the account settings section where you can manage your personal information. If needed, you may contact us to request access to, correction of, or deletion of the personal data you have provided.

Please note, however, that we may be required to retain certain information if we have a legal obligation to do so or a legitimate reason under applicable legislation.

Disclosure of Your Personal Data

Business Transactions

In the event of a merger, acquisition, or sale of the Company's assets, your personal data may be transferred to a third party as part of such transaction. In such cases, you will be notified in advance that your data has been transferred and may be subject to a different privacy policy.

Public Authorities

In certain circumstances, the Company may be required to disclose your personal data if mandated by law or in response to valid requests from public authorities (e.g., courts or administrative bodies).

Other Legal Grounds for Disclosure

The Company may disclose your personal data in good faith when such action is necessary to:

- comply with a legal obligation,
- protect and defend the rights or property of the Company,
- prevent or investigate potential wrongdoing in connection with the Service,
- protect the personal safety of users of the Service or the public,
- protect against legal liability.

Security of Your Personal Data

The security of your personal data is important to us. However, please note that no method of data transmission over the Internet or electronic storage is completely secure. While we strive to use commercially reasonable means to protect your personal data, we cannot guarantee its absolute security.



Detailed Information on the Processing of Your Personal Data

Our contracted service providers (data processors) may have access to your personal data. These third parties may, in accordance with their own privacy policies, collect, store, process, and transfer information about your activity while using our Service.

Analytics Services

We may use third-party services to monitor and analyze the use of our Service.

- **Google Analytics**

Google Analytics is a web analytics service provided by Google that tracks and reports website traffic. Google may use the collected data to monitor user behavior across websites and link it with other services it provides. It may also use this data to personalize ads within its advertising network.

You can opt out of Google Analytics tracking by installing the Google Analytics Opt-out Browser Add-on.

Certain features can also be disabled directly in your mobile device settings (e.g., ad settings) or according to the instructions provided in Google's Privacy Policy:
<https://policies.google.com/privacy>.

Email Marketing

We may use your personal data to contact you with newsletters, informational emails, or other communications that may be of interest to you.

You may opt out of receiving these communications at any time by clicking the unsubscribe link included in each email or by contacting us directly.

We may use external service providers to manage and send email communications:

- **Twilio Inc.**

Twilio services are used to deliver email and SMS notifications as part of the operation of the application. Twilio acts as a Data Processor under Article 28 of the GDPR, and the data is processed based on a data processing agreement.

Twilio's Privacy Policy: <https://www.twilio.com/en-us/legal/privacy>

Technical Communication via Email and SMS

As part of fulfilling contractual obligations and operating the Service, we may send you technical notifications, alerts, and system messages, particularly regarding:

- the operation and availability of the application,
- security events and verifications,
- changes to account settings or access,



- user-initiated actions (e.g., password resets, API notifications, system errors, etc.).

This communication is not of a marketing nature and is necessary to ensure the proper functioning of the Service, management of your account, and fulfillment of contractual obligations pursuant to Article 6(1)(b) of the GDPR.

We use an external service provider to send such notifications:

- **Twilio Inc.**

Twilio services are used to deliver email and SMS notifications as part of the application's operation. Twilio acts as a Data Processor under Article 28 of the GDPR, with data processing based on a data processing agreement.

Twilio's Privacy Policy: <https://www.twilio.com/en-us/legal/privacy>

Usage, Performance, and Security

To ensure the technical operation and improve the functionality of the Service, we use additional third-party tools.

- **reCAPTCHA (Google)**

We use the invisible reCAPTCHA security tool operated by Google. This tool may automatically collect certain data about you and your device to determine whether the activity is performed by a human or a bot.

Data collected by reCAPTCHA are processed in accordance with Google's Privacy Policy: <https://www.google.com/intl/en/policies/privacy>.

- **TermsFeed**

We use tools provided by TermsFeed to display cookie consent banners and manage consent through the Cookie Preferences Center.

For more information about TermsFeed's privacy practices, please visit: <https://www.termsfeed.com/privacy-policy>.

- **Google Charts**

We use the Google Charts library to display interactive charts on our website. This library may transmit technical data, such as the user's IP address, to Google servers to ensure proper functionality of the charts.

Google is committed to user privacy and provides detailed information in its Privacy Policy: <https://policies.google.com/privacy>.



GDPR and Personal Data Protection

Legal Grounds for Processing Personal Data under GDPR

We may process your personal data based on one or more of the following legal grounds:

- **Consent:** You have given consent for the processing of your personal data for one or more specific purposes.
- **Performance of a contract:** Processing is necessary for the performance of a contract to which you are a party, or in order to take steps at your request prior to entering into a contract.
- **Legal obligation:** Processing is necessary to comply with a legal obligation to which we are subject.
- **Protection of vital interests:** Processing is necessary to protect your vital interests or those of another natural person.
- **Public interest:** Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority.
- **Legitimate interest:** Processing is necessary for the purposes of the legitimate interests pursued by the Company.

The Company will be happy to clarify the specific legal basis that applies to a particular processing activity, especially where the provision of data is a statutory or contractual requirement or a condition for entering into a contract.

Your Rights under the GDPR

The Company is committed to maintaining the confidentiality of your personal data and ensuring you can exercise your rights. Under the GDPR, you have the right to:

- **Request access to your personal data** – you may request a copy of the data we hold about you and/or request that it be updated or deleted. In some cases, this can be done directly through your user account.
- **Request correction of your data** – you have the right to request the correction of inaccurate or incomplete data.
- **Object to processing** – particularly where processing is based on legitimate interest and you have a specific reason to object. You also have the right to object to processing for direct marketing purposes.
- **Request erasure of personal data** – where there is no longer a legal reason for us to continue processing it.
- **Request data portability** – you may request to receive your data in a structured, machine-readable format and transfer it to another controller (this applies only to data processed by automated means based on your consent or for the performance of a contract).



- **Withdraw consent** – where processing is based on your consent, you have the right to withdraw it at any time. This may affect the availability of certain features of the Service.

Exercising Your Data Subject Rights

You may exercise your rights by contacting the Company. Before processing your request, we may ask you to verify your identity. We strive to respond to all requests as promptly as possible.

You also have the right to lodge a complaint with a data protection authority within the European Economic Area (EEA). In the Czech Republic, this is the Office for Personal Data Protection – www.uoou.cz.

Links to Other Websites

Our Service may contain links to third-party websites that are not operated by us. If you click on a third-party link, you will be redirected to that party's website. We strongly recommend that you review the privacy policies of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party websites or services.

Changes to This Privacy Policy

We may update this Privacy Policy from time to time. We will notify you of any changes by publishing the updated version on this page.

If any changes are material, we will notify you via email and/or a notice within the Service before the changes take effect. The date of the latest update will be indicated at the top of this document.

We recommend reviewing this Privacy Policy regularly. Changes become effective upon publication.

Governing Law and Jurisdiction

Use of the Service is governed by the laws of the Czech Republic. Any disputes shall be resolved by the competent court based on the Operator's registered office.

Contact Us

If you have any questions about this Privacy Policy, you can contact us:

- By email: gdpr@terraverse.info
- Through our website: <https://www.terraverse.info/privacy-policy>.

