

Privacy Policy

Effective: 2026-07-13

This Privacy Policy explains how GEOX ("GEOX", "we", "us") collects, uses, shares, and protects information when you use the GEOX mobile application and related services (the "Service"). The Service helps you share your location with people you choose, receive place and safety alerts, and communicate within private groups.

This Policy is an integral part of the GEOX Terms of Service (the "Terms") and is incorporated by reference into them. Please read this Policy carefully, and if you have any questions, feel free to contact us at support@geoxapi.dev. If you have any ongoing questions about how to exercise your rights, you may also contact us at that same address.

1. Who is responsible

The first thing you should know is information about your data controller and processors. The data controller is an entity that determines the purposes and means of processing of the data. The data processor is an entity that processes the data on behalf of the controller. A third party is a person whose access to the data depends on their rights or duties.

1.1. Data Controller. The data controller for the Service is ADLOGIC - FZCO Silicon Oasis, Dubai, United Arab Emirates, reachable via the contact details in Section 12.

1.2. Data Processors. We use a limited number of service providers that process data on our instructions and under appropriate safeguards. We enter into data processing agreements with each of them requiring that they keep your data confidential and use it only as instructed by us. These providers are:

Hosting — hosting of our API infrastructure and storage of your personal data.

Apple — for push notification delivery, maps and address lookup, sign-in, and payments.

Expo — for the delivery of app updates, using an anonymous installation identifier.

Where there is a necessity, we may also engage additional service providers, contractors and third parties services and may share the data with them. That will help us operate, provide, improve, integrate, customize, support, and market our Service. We share the data, in particular, for purposes indicated herein. The types of service providers we may share information with include, in particular: data analytics providers, measurement partners, marketing partners, communication services providers, etc.

1.3. How Your Information Is Shared and Seen by Others. GEOX shares your information only as needed to provide the Service and only with the people you choose:

Live location and status are visible only to the contacts and groups you have accepted, and always subject to your sharing and pause settings. You can pause or stop sharing at any time.

Approximate location. If you enable "Hide exact location," we reduce the precision of your position before others see it, and may display only a broader area on the map rather than your precise point.

Chat messages are visible only to the participants in that conversation.

We do not sell your personal information under the California Consumer Privacy Act (CCPA/CPRA). Making your location visible to the contacts and groups you choose is a core function of the Service that you control — it is not a sale or disclosure of your data to third parties for their own purposes, and we do not permit our service providers to use your data for any purpose other than providing services to us.

1.4. Disclosure to Law Enforcement and Legal Authorities. We may disclose your personal data to third parties where we believe it is reasonably necessary to:

(a) comply with applicable law, a court order, subpoena, or a binding request from a law enforcement or other state authority, whether inside or outside your country of residence;

(b) investigate, prevent, or take action regarding illegal activity, fraud, violations of our Terms of Service, or threats to the safety of any person;

(c) establish, exercise, or defend legal claims, including sharing data with our lawyers, a court, or authorized professionals to protect the rights, property, or safety of GEOX, our users, or the public.

2. Purposes of Data Processing; Personal Data Collected; Source; Legal Basis:

We collect only what is needed to provide the Service. Depending on how you use GEOX, this may include:

Purpose	Personal Data Collected	Source	Legal Basis
Provide the Service and sync your settings across sessions and enforce your privacy choices (pause sharing, hide exact location, revoke sharing). Maintain subscription and account status where applicable.	Account and profile: display name, email address, profile photo, language and in-app preferences, subscription plan status.	we receive this data from you	performing of the contract with you
Provide the Service, Improve reliability, prevent abuse, and	Authentication: sign-in credentials or tokens stored	we receive this data from you	legitimate interest

protect the security of the Service.	securely on your device (for example via secure storage). We do not store your password in plain text on the device.		
Show your location (precise or approximate, according to your settings) to contacts and groups you approve.	Location-related settings: whether sharing is on or paused, whether you share precise or approximate location, and background update preferences.	we receive this data from you	consent
Provide the Service	History: location history where the feature is available and sharing is enabled.	we receive this data from you	legitimate interest
Improve and provide the Service	Device data : battery level and charging state, network reachability, and timestamps of last activity — sent with location or presence updates to show availability and support alerts. Safety features: SOS or shake-triggered alerts, and emergency contacts you designate.	we receive this data from you	legitimate interest
Display other members' locations when they share with you.	People and groups: contacts you add, group membership, invite and sharing relationships, and roles you assign.	we receive this data from you	performing of the contract with you

Deliver chat messages, invites, and in-app alerts and process SOS and emergency notifications to contacts you select.	Content of messages: content you send in in-app chat between you and your contacts.	we receive this data from you	performing of the contract with you
Provide you with a better communication and connection experience	Photos: only when you choose to scan a QR invite code or set a profile picture — not in the background.	we receive this data from you	performing of the contract with you
Send entry/exit and other place-related notifications you configure.	Notifications: push notification permission status and, when enabled, device identifiers needed to deliver alerts (for example place arrivals, battery warnings, SOS).	we receive this data from you	legitimate interest
to provide you with paid features	history of transactions, type and amount of remuneration, date of purchase, subscription status	from Apple	performing of the contract with you and our legal interest

Legal Bases. Legal bases are the grounds set forth by the GDPR on which we may process your data. We rely on the following legal bases:

- (a) performing the contract with you — the main legal basis that we use to process your data. It includes mostly everything we do to provide you with services, under our Terms of Use and their appendices. You may restrict us from processing your data, but please be advised that, in such a case, we will not be able to provide services to you.
- (b) legal obligation — we may process your data when we have a legal obligation when it is required by applicable laws, e.g., in order to prevent fraud, assist law protection and enforcement bodies.
- (c) Legitimate interest – we have a commercial interest in processing your personal data that is justified, balanced and does not infringe on your privacy (e.g., statistical reporting). Where the legal basis is legitimate interests, you have a right to object to our use of your data.
- (d) consent — we may process some of your data when we have your consent to do so. Where the legal basis is consent, you can withdraw consent at any time.

You acknowledge and agree that we may receive your personal data from third parties — including other users, official bodies, and third-party providers — for example when you connect your GEOX profile with another service, or when we receive inquiries, court orders, subpoenas, or claims.

From time to time we may run surveys or request feedback for research purposes, and we may contact you to ask whether you would like to take part. We may also contact you about optional marketing campaigns. Participation is always optional. If you do not wish to be contacted about a survey or marketing campaign, you can let us know at support@geoxapi.dev or through the relevant in-app setting.

5. Permissions and your choices

You control many features through iOS system settings and GEOX Settings:

Location: you can allow or deny foreground and background location in system settings; GEOX mirrors those permissions in the app.

Pause sharing: temporarily stop sharing without removing contacts.

Hide exact location: share a less precise position.

Notifications: enable or disable push alerts in system settings and in the app.

Camera and photos: requested only when you scan a QR code or change your avatar.

Sign out: ends your session; you can delete your account in GEOX Settings.

6. Storage, security, and retention

Data is transmitted over encrypted connections (HTTPS) to our API infrastructure. Tokens on your device are stored using platform secure storage where available.

We retain information for as long as your account is active and as needed to provide the Service, comply with law, resolve disputes, and enforce agreements. Location history and

messages may be retained according to product features and server configuration. We may retain limited data where we have a legal obligation or another lawful ground to do so, and we will tell you where this applies. You may request deletion of your account or personal data at any time via our email (see Section 12). We will respond to your request within a reasonable time (one month for EU/UK users, 45 days for USA users).

7. Children

GEOX is not directed at children under 16. We do not knowingly collect personal information from children. If we learn that a person below the applicable age has provided us data, we will take steps to terminate the account and delete the data. If you are a parent or guardian and believe a child has provided us data, contact us and we will act promptly.

8. International users

Your information may be processed in countries outside the EEA or the UK that may have different data protection laws. Where we transfer personal data collected in the EEA or UK to a country without an adequacy decision, we rely on appropriate safeguards, in particular the Standard Contractual Clauses approved by the European Commission and, for UK data, the UK International Data Transfer Addendum, together with additional safeguards as needed. You may request a copy of the relevant safeguards by contacting us.

9. Your rights

You have certain rights over your personal data as a data subject. These rights may apply differently, or be referred to under different names, depending on where you live.

Right to Access (Know): You can ask what personal information of yours we process, as well as clarifications such as the purpose of collection, the period of processing, and which third parties may have access.

Right to Rectify (Correct): You can request correction of inaccurate personal information, or completion of incomplete details. You can also update most information yourself at any time through your GEOX profile settings;

Right to Erase (Delete): You may request deletion of your personal data in the following cases: (i) it is no longer necessary for us to hold it, (ii) you withdraw consent where processing is based on consent, (iii) you object to processing based on legitimate interest, (iv) you no longer wish us to use your data for commercial communication, or (v) you believe we are processing your data unlawfully. Unless we are legally required to retain it, we will comply with your request;

Right to Restrict (opt-out of) Processing: You may request that we limit the processing of your data, for example (i) if you contest its accuracy, (ii) if processing is unlawful but you prefer restriction over deletion, (iii) if you believe that we no longer need your data but it is still necessary for the establishment, exercise or defense of legal claim, or (iv) if you have objected

to processing and the request is under review. You may also restrict geolocation data directly by adjusting your device settings

Right to Object: You may object to the processing of your personal data. Please provide your reasoning so we can assess whether there are compelling legitimate grounds for us to continue processing, or whether the data must still be processed for the exercise or defense of our legal rights;

Right to Withdraw Consent: You may withdraw your consent to processing at any time. This does not affect the lawfulness of processing based on consent before its withdrawal.

Right to Lodge a Complaint: If you are a UK resident, you have the right to complain to the Information Commissioner's Office (ICO) whether you have any grievance against the way we collect, use or share your data. You can do so under [the following link](#). If you are in the EEA, you may lodge a complaint with the data protection supervisory authority in your country of residence.

Right to Data Portability: You may request a copy of your personal data in a structured, commonly used, machine-readable format. You may also request that we transfer this data to another party (i) if the processing is necessary for the performance of the contract or (ii) if the processing is based on your consent and where the processing is carried out using automated processes.

10. Data Protection; Security

We incorporate commercially reasonable safeguards to help protect and secure your data. At GEOX, we prioritize the privacy and security of your personal information through robust measures and continuous improvements. Our security setup is built to keep your data safe and includes these key components:

- (a) Data retention — we keep personal data only as long as necessary for the purposes it was collected or as required by law, and delete it securely when no longer needed.
- (b) Access controls — access to personal data is limited to a small number of authorised personnel, logged, and reviewed regularly. Sensitive systems require multi-factor authentication, and sessions log out automatically after inactivity.
- (c) Encryption and secure storage — we use industry-standard encryption to protect data both in transit and at rest.
- (d) Transfer and integrity controls — data cannot be read, copied, modified, or deleted during transmission without authorisation, and all entries and changes are logged to maintain an audit trail.
- (e) Availability — regular backups, recovery procedures, and firewall protection guard against accidental loss or destruction of data.
- (f) Ongoing review — we conduct regular security assessments to identify and address potential risks.
- (g) Data minimisation — we collect only the data necessary to provide the Service.

11. Changes to this policy

We may update this Privacy Policy from time to time. We will post the new version in the app and update the effective date. Continued use after changes means you accept the updated policy, unless otherwise required by law.

12. Contact

For privacy questions or requests: support@geoxapi.dev