

Privacy Policy for Free Wi-Fi Service

Article 1 – General

1. This privacy policy displays the privacy policy of the [Hotspot Operator]'s free Wi-Fi network. The free Wi-Fi network is provided by [Hotspot Operator] and powered by Peplink.
2. If you want to log in to the free Wi-Fi network, you must first allow Peplink and [Hotspot Operator] access to the data of his Facebook account, Google+ account, Instagram account, LinkedIn account, Twitter account, Wechat account, Weibo account, or the user must enter his email address.
3. Please read this privacy policy and the Terms of Service carefully.
4. If you are 14 years of age or younger, you must have permission from your parents or guardian before using [Hotspot Operator]'s free Wi-Fi network.

Article 2 – Collection and use of personal data

1. Peplink stores your personal information when signing in to the free Wi-Fi network. [Hotspot Operator] is allowed to access the stored personal information in order to make the free Wi-Fi network free of charge.
2. Peplink stores the following personal information of you: Data logged in with, for example, Facebook, Google+, Twitter, Instagram, LinkedIn (Social Media Account ID, Email Address), selected login method, device data (operating system, browser data, language, MAC address, IP address, IDFA and AAID), location data, time of sign in to Wi-Fi network, duration of use of free Wi-Fi network, and the data you send via our website. Peplink does not store information about which websites the user visits.
3. With explicit consent from you, [Hotspot Operator] and Peplink uses the your personal information for marketing purposes, such as:
 - Showing websites in a correct and personalized way.
 - To map statistics about user behavior.
 - To give your feedback to [Hotspot Operator] and Peplink.
 - To better understand your needs (whether through cookies), to better improve services and free Wi-Fi network, and to offer a better performance of free Wi-Fi network, Peplink technology, security and software website(s).
 - For handling requests, requests, complaints submitted via the website or other means of communication.
 - To simplify future login attempts.
 - To get an idea of the movements of all you.
 - Comply with legal and regulatory obligations.
 - To safeguard and protect [Hotspot Operator]'s and Peplink's business operations and to identify and minimize fraud, unauthorized activities, claims and other liabilities.

4. With explicit permission from the user, [Hotspot Operator] uses personal information from the user to inform him about special offers and actions of [Hotspot Operator], for example, a newsletter, SMS or Facebook notification.

Article 3 – Transmission to third parties

1. [Hotspot Operator] and Peplink will not sell your personal information to third parties and will only make it available to third parties directly involved in performing the service to the user. Employees of [Hotspot Operator], Peplink and third parties are required to respect the confidentiality of the personal data.
2. [Hotspot Operator] and Peplink will not provide advertisers with information about identifiable persons, but may provide advertisers with data collected by [Hotspot Operator] and Peplink through your personal information and other data collected by [Hotspot Operator] and Peplink regarding gender, age, and other demographic analysis. [Hotspot Operator] and Peplink can use such information to help advertisers and sponsors reach their target groups. [Hotspot Operator] and Peplink may use your information to allow [Hotspot Operator] and Peplink or sponsors and / or advertisers to properly match an advertisement or promotion.
3. [Hotspot Operator] and Peplink may transfer and store information collected by SpotOn Wifi to and from countries other than the country where the information was originally collected, including the United States and Europe, in accordance with the applicable legislation.

Article 4 – Cookies

1. [Hotspot Operator] and Peplink use so-called cookies. Cookies are small text files that are placed on the user's computer and are read by a browser.
2. [Hotspot Operator] and Peplink use cookies to remember the user's settings and preferences.
3. The website places cookies from the U.S. company Google as part of the "Analytics" service. [Hotspot Operator] and Peplink use this service to keep track of reports on how visitors use the service. Google may provide this information to third parties if Google is required to do so by law, or in so far as third parties process information on behalf of Google. [Hotspot Operator] and Peplink do not affect this. More information about Google's privacy policy is available on the Google website.
4. The user can set his browser so that no cookies are received while visiting the website.

Article 5 – Social media

1. To log in to the free Wi-Fi network, there are buttons for various social media channels on the login screen. These buttons are realized by a code provided by the relevant social media channel. This code includes a cookie.

2. The privacy statements of the relevant social media channel (which may change regularly) tells how these websites deal with the personal information of the user.

Article 6 – Change / Removal of Personal Data

1. You the right to view, improve, supplement, delete and shield his personal data in accordance with the relevant privacy rules.
2. Peplink will send the requested information within 4 weeks, possibly requiring you to first request a proof of identity.
3. When you want to exercise the rights or you have questions about the use of the above rights or privacy policy, you are welcome to contact [Hotspot Operator] at [Customer's address] or Peplink at privacy@peplink.com. If you no longer wish to receive [Hotspot Operator] or Peplink marketing communications, you have the right to request this by emailing to [privacy@hotspot.operator.com] or privacy@peplink.com.

Article 7 – Retention period

1. [Hotspot Operator] and Peplink store the personal data for a period of up to 24 months after the last time the user logged in to the free Wi-Fi network.
2. [Hotspot Operator] and Peplink are entitled to retain the personal data for a longer period than the term mentioned in the previous member, if this is done on the basis of a legal provision.

Article 8 – Liability

1. The InControl Wifi privacy policy refers only to data obtained through a social media account and the free Wi-Fi network. [Hotspot Operator] and Peplink are not responsible or responsible for (the operation and / or content of) third party services and / or third party websites.

Article 9 – Outside the EU

1. For technical and operational reasons, data may be passed on (to servers of) affiliated companies and / or advertisers in the United States or other countries outside Europe. Because privacy protection rules may not provide the same protection as in the EU, the user hereby agrees, as far as necessary, that data may be passed to countries outside of Europe.

Article 10 – Changes to privacy policy

1. [Hotspot Operator] and Peplink have the right to change this privacy policy.
2. Should [Hotspot Operator] and Peplink decide to change the privacy policy, these changes will be included directly in this privacy policy.

Article 11 – Questions

1. For questions regarding this privacy policy, please email [privacy@hotspot.operator.com] or privacy@peplink.com.