

On The Way, LLC
Sirca Navigation Mobile App
Privacy Notice

Last Updated: November 10, 2022

1. INTRODUCTION

On the Way, LLC, together with its affiliates and subsidiaries (collectively, “OTW,” “we,” “us,” or “our”) respect your privacy and are committed to protecting it through our compliance with this Privacy Notice (the “**Privacy Notice**”).

OTW offers mapping, mobile navigation, and group-based services to users of our Sirca Navigation-based mobile application (the “**Mobile App**,” “**App**,” or “**Application**”), which you may download from mobile application stores, like Apple’s App Store® and Google’s Play® store.

This Privacy Notice describes the types of information we may collect from you or that you may provide when you use our Mobile App, and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This Privacy Notice does not apply to information collected by:

- us offline or through any other means, including on any website or other Application operated by OTW or any third party (including our affiliates and subsidiaries); or
- any third party (including our affiliates and subsidiaries), including through any application or content (including advertising) that may link to or be accessible from or on our Mobile App.

Please read this Privacy Notice carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to download and use our Mobile App. By using our Mobile App, you agree to this Privacy Notice. This Privacy Notice may change from time to time (see [Changes to Our Privacy Notice](#)). Your continued use of our Mobile App after we make changes is deemed to be acceptance of those changes, so please check this Privacy Notice periodically for updates.

In this Privacy Notice, the term “personal information” means information which you provide to us which personally identifies you, such as your name, and, in certain circumstances, your location and route information or other data which can be reasonably linked to such information by OTW.

2. INFORMATION WE COLLECT ABOUT YOU AND HOW WE COLLECT IT

Generally

OTW’s Mobile App collects information to provide better services to all its users – from simply figuring out what’s the best route, to resolving more complex issues like monitoring traffic so you know when to leave. The information we collect, and how that information is used, depends on how you choose to use our Mobile App and how you manage your privacy controls.

Information You Create or Provide to Us

We collect limited information about users of our Mobile App by which they may be personally identified, such as a real name, alias or nickname, or a user name or other online or personal identifier.

OTW collects this information directly from you, for example, if you invite a contact from your mobile phone or email to meet at a specific location using the “Link Up” feature in our Mobile App. In this instance, we will collect any names entered by you on the App that identify yourself and any of your invitees on the group invite (among other non-personally identifying details associated with the Link Up).

Information We Collect As You Use Our Services

We also collect information about your use of the Mobile App as well as information from the device on which you have the Mobile App installed. For example, we may collect:

- Internet Protocol (IP) address;
- Current location coordinates (longitude and latitude);
- Location search history;
- Duration of searches and/or time spent viewing locations;
- Viewed details on a location;
- Taps on quick search buttons;
- Addition of a location to a navigation route;
- Completion of a trip to a location/arrival status;
- The type and geographic location of the device and operating system you are using with our App;
- Preferred mode of transportation, color scheme, and search result display (list or map view); and/or
- Unique device identifiers, such as a device ID and/or an advertising ID.

We may collect this information:

- directly from you when you provide it to us (or from a contact who you have invited to Link Up with on the Mobile App and navigate to the same location); or
- automatically as you navigate through and interact with our Mobile App.

3. HOW WE USE YOUR INFORMATION

We use information that we collect about you or that you provide to us, including any personal information:

- to provide, support, personalize, and develop the services we offer to you through our Mobile App;
- to allow you to participate in the interactive features of our Mobile App;
- to help maintain the safety, security, quality, and integrity of our Mobile App, databases and other technology assets, and business;
- for internal testing, research, analysis, and product development, including to develop and improve our Mobile App and the services we offer through it, train/retrain AI applications, and demonstrate our services;
- to notify you of changes to our Mobile App or any products or services we offer through it; and
- for any other purpose with your consent or as otherwise permitted by law.

4. DISCLOSURE OF YOUR INFORMATION

We do not share, sell, or otherwise disclose your personal information for purposes other than those outlined in this Privacy Notice.

We may disclose personal information that we collect or you provide as described in this Privacy Notice:

- to service providers who we use to support our business, including those that help us provide you with recommendations on nearby places you can visit and accurate directions to get you to your designated location(s);
- to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by OTW about our App and users are among the assets transferred.

We may also disclose your personal information:

- to comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- to enforce or apply our [Terms of Use](#) and other agreements, including for billing and collection purposes.

- if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of OTW, the App, our brand, our customers, or others. This may include exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

5. CHOICES ABOUT HOW WE USE AND DISCLOSE YOUR INFORMATION

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Location Information.** You can choose whether or not to allow our Mobile App to collect and use real-time information about your device's location through the device's privacy settings. For example, the "location" permissions on your mobile device may allow you to elect to never share location information with us, share location information only while you are using our Mobile App, or always share location information even if you are not using our Mobile App. If you elect not to share your location information, you may be unable to access some features of our services that are designed for mobile devices. You can also disable location-based alerts in the Settings section of our Mobile App.
- **Restrict Processing.** If you do not wish to have some of your usage details used by OTW to provide you with recommendations based on your interactions with places on or through the App, your search history in the App, and/or your preferred mode of transportation, you can opt-out at any time by turning off the relevant toggle switch(es) in the "Privacy Options" section of our App.

6. DO NOT TRACK SIGNALS

Some web browsers permit you to broadcast a signal to websites and online services indicating a preference that they "do not track" your online activities. At this time, we do not honor such signals and we do not modify what information we collect or how we use that information based upon whether such a signal is broadcast or received by us.

7. DATA SECURITY

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. The safety and security of your information also depends on you.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted on or through our Mobile App. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Mobile App.

8. THIRD PARTY SITES

Our Mobile App may contain links to third party websites or services that are not owned or controlled by us. Please be aware that we are not responsible for the privacy practices of such other websites or services. The privacy practices of these third parties, including details on the information they may collect about you, are subject to the privacy statements of these parties, which we suggest you review.

9. CHILDREN UNDER THE AGE OF 13

Our Mobile App is generally not directed at nor intended for use by minors under 13 years of age. We do not knowingly collect personal information from minors under the age of 13. If you are under 13, please do not use or provide any information on our Mobile App or through any of its features, or otherwise provide any information about yourself to us, including your name, address, telephone number, email address, or any user name you may use. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us using the [Contact Information](#) below.

10. CHANGES TO OUR PRIVACY NOTICE

We may change this Privacy Notice at any time. It is our policy to post any changes we make to our Privacy Notice on this page. If we make material changes to how we treat our users' personal information, we will notify you through a notice on our Mobile App's home page or using a similar method. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically accessing our Mobile App and reviewing this Privacy Notice to check for any changes.

11. CONTACT INFORMATION

If you have any questions, concerns, or complaints regarding our Privacy Notice, please contact us at:

On The Way, LLC

631 Lake Point Dr.

Irving, TX 75039

Email: admin@sircanav.com

Website: www.sircanav.com