

GetPassive End-User Privacy Policy

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This privacy policy explains how **GetPassive Ltd** uses limited technical data when you choose to allow an app to share your device bandwidth as part of the GetPassive internet-sharing network.

GetPassive Ltd is a company registered in England and Wales under company number **17245817**. Our registered office is in **London, United Kingdom**. You can contact us at **privacy@getpassive.io** or by post at: **GetPassive Ltd, London, United Kingdom**.

1. Who is responsible for your data?

For the bandwidth-sharing feature, **GetPassive Ltd** and the developer of the app you are using are normally **joint controllers** under the UK GDPR. This means both parties decide important parts of how and why your data is used for this feature.

The app developer is usually your first point of contact because they operate the app and show you the consent request. GetPassive is responsible for the technical operation of the network and for the limited network data described below.

2. Purpose of Processing

GetPassive operates an internet-sharing network. With your consent, a portion of your device's idle bandwidth and your public IP address are made available to our business partners. They use this to access publicly available web content for purposes including:

- Market and pricing research
- Advertisement verification
- Brand and trademark protection
- Search engine optimization (SEO) monitoring
- Cybersecurity threat detection
- Content delivery optimization

We do not access your personal files, messages, browsing history, or stored data. Your device only acts as a gateway for routing requests to publicly accessible web pages.

You can choose **Reject** if you do not want to take part. Rejecting must be as easy as accepting.

3. What data we collect

At end-user level, GetPassive does **not** need your name, email address, postal address, payment details, contacts, photos, messages or browsing history.

When you give consent, we may collect and use the following limited technical data:

Data	Why it is used
IP address	To route connections, prevent abuse and understand the approximate network location.
Approximate location	Country or region-level location derived from the IP address, used for routing and compliance.
Device identifier	A pseudonymous identifier for the app/device installation, used to measure active participation and prevent abuse.
Traffic metadata	Timestamps, target host categories, bytes transferred and duration of routed connections, used for network operation, security, measurement and payment calculation for the app developer.

We do **not** inspect the content of your personal files, private messages, photos, microphone, camera, contacts or app passwords.

4. Our lawful basis

We rely on your **consent** under:

- **Regulation 6 of the Privacy and Electronic Communications Regulations 2003**, as amended, where consent is required for storing or accessing information on your device; and

- **Article 6(1)(a) of the UK GDPR** for processing personal data connected with your participation.

Consent must be freely given, specific, informed and unambiguous. You must be offered an equally prominent way to reject the feature.

You may withdraw consent at any time in the app settings or by using the method provided by the app developer. Withdrawing consent does not affect processing that happened before withdrawal.

5. Children and age restriction

The GetPassive bandwidth-sharing feature is for people aged **18 or over** only. App developers must not enable the feature for children or for users they know, or should reasonably know, are under 18.

6. How long we keep data

We keep data only for as long as needed for the purposes described in this policy.

- **Traffic and network logs:** normally kept for no more than **30 days**.
- **Consent and device participation records:** kept while the app integration is active and for a reasonable period afterwards to evidence consent, resolve disputes and meet legal obligations.
- **Security and abuse records:** may be kept longer where needed to investigate misuse, protect the network, comply with law or establish, exercise or defend legal claims.

7. Where data is processed

We use secure cloud infrastructure in the **United Kingdom and European Union**. If data is transferred to a country without an adequacy decision, we use appropriate safeguards such as the UK International Data Transfer Agreement, the UK Addendum to the EU Standard Contractual Clauses, or Standard Contractual Clauses, as applicable.

8. Who receives the data

We may share limited data with:

- the app developer that integrated GetPassive;
- service providers that help us run secure cloud infrastructure, analytics, fraud prevention, support and payment measurement;
- professional advisers, insurers and auditors; and
- regulators, law enforcement or courts where required by law.

We do not sell your name or contact details because we do not collect them at end-user level for this feature.

9. Your rights

Under the UK GDPR, you may have the right to:

- request access to your personal data;
- request correction of inaccurate data;
- request deletion of your data;
- object to or restrict certain processing;
- withdraw consent at any time;
- request data portability where applicable; and
- complain to a regulator.

To exercise your rights, contact the app developer or email privacy@getpassive.io. Because GetPassive usually only sees a device identifier and technical network data, we may need information from the app developer to identify the relevant record.

10. Complaints

You can contact us first at privacy@getpassive.io. You also have the right to complain to the UK Information Commissioner's Office at ico.org.uk.

11. Changes to this policy

We may update this policy from time to time. If the changes are material, the app developer should tell you and, where required, ask for fresh consent.