ZeroSignal Privacy Policy

Last updated: 31 October 2026

1. Identity of the data controller

Controller: David Ledesma Hernández

Email: hola@zerosignal.app

With regard to the data that the User provides when signing up for activities of verified organisations, the data controller is the organisation itself, and ZeroSignal acts as data processor on its behalf (see section 6).

2. Personal data processed

ZeroSignal may process the following categories of personal data:

- **Registration data:** name, email address and password (or the Google or Apple account with which the User registers), date of birth, profile photograph and personal description.
- **Usage data:** places, routes and activities created, viewed or completed, interactions with other Users and participation in the points system. We also record how the App is used (screens visited, content opened and notifications opened) in order to measure and improve the service.
- **Preferences and interests:** the activities (for example, hiking or cycling) and the types of place (for example, viewpoints or swimming spots) that the User voluntarily chooses in the App.
- **Location data:** real-time geographical position while using the route-tracking or nearby-exploration features. In addition, when the User has granted location permission, their last known location is stored in order to show them nearby content and send them alerts about their area. If the User joins a group recording (“Live Route”), including the rooms for events of verified organisations, their position is shared in real time only with the participants in that room for as long as they remain in it. In races, it is also visible to anyone with the link (see section 6).
- **Planning requests («Plan»):** the text of the request, the starting point, the approximate municipality of origin, the preferences given, and the routes proposed and chosen. When the User designs a route by hand, the points placed on the map and the resulting route.
- **Messages:** the texts, voice messages, photos, videos and places or routes that the User sends through the in-app chat, whether in private messages with other Users, in group chats or in activity chats.
- **Sign-up data for activities of verified organisations:** the answers to each organisation’s form; the date of birth when the activity requires a minimum age; proof of acceptance of its terms (version, date and App version); where applicable, the signed declaration of conformity (text, name, account email, date and time, IP address, App version and form answers); and the attendance recorded by the organisation.
- **Saved sign-up details:** if the User authorises it, their answers to the common questions (name, email, phone, date of birth, identity document, emergency contact, allergies, federation licence and size), to fill in future sign-ups.
- **Connected accounts:** if the User connects their Suunto account, their Suunto username, the access keys (encrypted), the connection date and, for each activity recorded with their watch, its date, duration, distance and elevation gain.
- **Installation source (Android only):** the source, medium and campaign through which the App was installed, provided by Google Play.
- **Data of members of verified organisations:** when a User acts as a manager, collaborator or guide of a

verified organisation, their role in the group and their name as guide of the activities assigned to them.

- **Technical data:** device information (manufacturer and model), operating system, App version, language, time zone, IP address, connection logs and cookies (in accordance with the Cookie Policy).
- **Diagnostic data:** App crash reports (technical description of the error, device model, operating system and App version). These reports do not include the User's name, email address or account identifier.

The data required to create and maintain the account are the name, email address and password (or the Google or Apple account); without them it is not possible to use ZeroSignal. All other data are voluntary or are generated through use of the App. The User may choose not to provide some of them (for example, by not granting location permission, not indicating interests or not indicating their date of birth), although certain features will then not be available; for example, they will not be able to sign up for activities that require a minimum age.

3. Purposes of the processing

The data will be used to:

1. Manage the User's registration and account.
2. Enable the use of ZeroSignal's features (viewing, saving and sharing spots, routes and activities, and recording routes).
3. Generate routes at the User's request from what they write in «Plan», and let them design routes by hand on the map.
4. Personalise the experience: recommend nearby routes and places based on the interests the User has chosen, the routes they have completed and their location.
5. Send notifications about activity in the App and about recommended content (for example, a weekly summary of nearby plans), respecting the User's notification preferences and avoiding sending them at night according to their time zone.
6. Facilitate social interaction between Users (in-app chat with private, group and activity messages, including voice messages; attendance at activities; groups and group recording with shared position).
7. Manage sign-ups for activities of verified organisations and make available to the organisation the data it requests.
8. Send to Suunto the routes the User chooses and receive their activities, to record them as completed or suggest publishing them.
9. Fill in future sign-ups with the saved details.
10. Know, for statistical purposes, through which channels new Users arrive.
11. Automatically translate the public descriptions of places, routes, activities and groups into each User's language, and respond to the artificial intelligence searches made by the User.
12. Analyse use of the App in order to improve it.
13. Detect and fix technical faults in the App.
14. Ensure the security and proper functioning of ZeroSignal (detection of fraud, abuse or misuse).
15. Comply with applicable legal obligations.
16. Where express consent has been given, send informational or promotional communications related to ZeroSignal.

4. Legal basis for the processing

Data are processed on the following legal bases:

- **Performance of a contract:** provision of ZeroSignal's services, including the service's own notifications, the chat, sign-up for activities and the routes the User requests or designs in «Plan».
- **Compliance with legal obligations:** tax, data protection and digital services legislation.
- **Legitimate interest:** improving the quality of the service, analysing use of the App, detecting and fixing faults, preventing fraud, ensuring the security of the community, keeping proof of acceptance of the organisations' terms and of the signature of their declarations, and knowing where installations come from (the User may object by turning off "Help improve the app").
- **User consent:** sending commercial communications, processing location data, using the interests the User chooses to personalise recommendations, and providing sign-up data to a verified organisation when the User decides to sign up for one of its activities. Indicating interests is voluntary and the User may change them at any time. Connecting to Suunto and keeping saved sign-up details are based on the User's consent (Art. 6(1)(a) GDPR); allergies, on their explicit consent (Art. 9(2)(a) GDPR). The User may withdraw it at any time by disconnecting Suunto or deleting the saved details in Settings, without affecting the lawfulness of prior processing.

5. Recipients, processors and international transfers

- ZeroSignal will not disclose personal data to third parties without the User's consent, unless required by law.
- When the User signs up for an activity of a verified organisation, the sign-up data are made available to that organisation, which receives them as data controller (see section 6).
- Suunto Oy (Finland), when the User connects their account: it receives the routes the User sends and processes the data of their Suunto account as an independent controller, under its own privacy policy.
- Technology providers that provide hosting, storage, analytics or communication services may access the data as data processors, under contracts in accordance with Art. 28 GDPR. These include:
- OVH and netcup, hosting providers of ZeroSignal's servers, located in the European Union.
- Mistral AI, to interpret «Plan» requests with artificial intelligence. It receives the text of the request and the approximate municipality of origin, not the User's identity or coordinates. It processes the data in the European Union and neither keeps it nor uses it to train its models.
- Google (Firebase Cloud Messaging), to deliver push notifications.
- Google (Firebase Crashlytics), to receive App crash reports.
- Google (Cloud Translation), to automatically translate public descriptions.
- Anthropic, to automatically translate public descriptions (it receives the text being translated, not the User's identity).
- Mapbox, to display maps, search for places and stops, calculate directions to a destination and calculate the legs of routes designed by hand.
- DonDominio, to send the service's emails (for example, verification or password-change codes).
- RevenueCat, to manage Premium subscriptions (see section 11).
- In the event of international transfers (for example, providers with servers outside the EU), an adequate level of protection will be ensured by means of standard contractual clauses approved by the European

Commission or by means of the EU-US Data Privacy Framework where the provider participates in it.

ZeroSignal in ChatGPT

- The ZeroSignal plugin for ChatGPT searches routes and spots in the public catalogue. It does not need a ZeroSignal account and does not identify the User.
- **Data we receive:** the places and filters of each search that ChatGPT sends us (for example, “Olot”, “hiking” or “under 12 km”), the language and, if ChatGPT shares it, the User’s approximate location to sort results by distance. We do not ask for the exact location, and we do not receive the conversation or the User’s name, email address or ChatGPT account.
- **Purpose:** only to answer the search. ChatGPT also sends an anonymous identifier, which we keep in memory for one minute to limit the number of searches and prevent abuse.
- **Retention:** we do not store searches or build profiles. The server’s technical logs, which may include the search text and the approximate location, are deleted after 24 hours. Access logs, with the IP addresses of OpenAI’s servers, are deleted after 14 days.
- **Recipients:** this data is not shared with anyone. It is processed on ZeroSignal’s servers in the European Union (OVH).
- **User control:** the User can disable or remove the plugin at any time in ChatGPT’s settings. OpenAI processes the conversation under its own privacy policy.

6. Activities of verified organisations

Verified organisations (clubs, guiding companies or associations whose identity has been checked by ZeroSignal) may publish activities with a sign-up form and their own terms. When the User signs up for one of them:

- **Who decides about the data:** the organisation decides which data it requests and for what purpose, and is the data controller. ZeroSignal holds the data on its behalf, as data processor.
- **Who sees them:** only the guide of the activity and the organisation’s managers. Other participants do not see the answers.
- **How they are stored:** the answers are stored in encrypted form.
- **For how long:** the answers are deleted 30 days after the activity. If the User cancels their sign-up or the organisation removes them, until that date the organisation can still see their sign-up, marked as removed, with their answers. If they delete their account, these are erased straight away. The signed declaration of conformity is kept encrypted as proof for one year from the activity, even if the User cancels, and is deleted earlier if the activity or the account is deleted.
- **Date of birth:** if the activity requires a minimum age and the User has no date of birth in their profile, they will be asked for it and it will be saved in their profile. Other Users are shown only the age, never the date.
- **Proof of acceptance:** ZeroSignal keeps a record of which version of the organisation’s terms the User accepted, when, and from which version of the App, for as long as their participation continues, and anonymises it if the User deletes their account.
- **Limits on the organisation:** organisations may only use these data to manage the activity, may not use them for commercial purposes without the User’s consent, and may not request bank details, payment card details or passwords. They may only request health data, such as allergies, when necessary for the safety of the activity.

- **Declaration of conformity:** some activities require reading and signing a declaration from the organisation. Full name is required, and the organisation may also ask for an ID document, phone number and email. A signed document is generated, which only the guide and the organisation's managers can access.
- **Attendance:** the guide may record attendance. Repeated absences may lead the organisation to block the User's new sign-ups for its activities.
- **Saved sign-up details:** ZeroSignal is their controller and organisations have no access to them. They are only used to fill in the form when the User signs up.
- **Live events:** if the activity is an event and the User joins its "Live Route" room, their real-time position is visible to the other participants in the room, including the guide and the organisation's managers, for as long as they remain in it.
- **Races:** anyone with the race link can see each runner's position, name and photo on the map, and their progress to the finish, while the room is open. Runners can hide themselves from inside the room. Any bib number is kept with the activity and is seen only by the guide and the organisation's managers.
- **Rights:** the User may exercise their rights over the sign-up data with the organisation or by writing to hola@zerosignal.app, and ZeroSignal will forward the request to the organisation.

7. Data retention

Personal data will be kept:

- For as long as the User keeps their account active.
- After the account is closed, they will be kept blocked for the time necessary to comply with legal obligations (a maximum of 6 years for tax and contractual matters).
- Location data will not be kept beyond the time strictly necessary to provide the corresponding feature. The last known location is replaced each time it is updated, is used for recommendations and alerts only while it is less than 30 days old, and is deleted when the account is deleted.
- «Plan» requests are deleted automatically after 30 days, or earlier if the User deletes their account. Routes the User saves are kept like the rest of their routes.
- Answers to the sign-up forms of verified organisations are deleted 30 days after the end of the activity (see section 6).
- The connection to Suunto is kept until the User disconnects it or deletes their account; the data of each activity received, for 90 days.
- Saved sign-up details are kept for 365 days from their last use, or until the User deletes them.
- The signed declaration of conformity is kept for one year from the activity.
- App usage records are deleted automatically after 90 days.
- Crash reports are kept for a maximum of 90 days.
- Interests, time zone and saved recommendations are kept until the User changes them or deletes their account; they are erased when the account is deleted.

8. Users' rights

The User may at any time exercise their rights of:

- **Access:** to know which data we process.

- **Rectification:** to modify inaccurate or incomplete data.
- **Erasure:** to request the deletion of their data ("right to be forgotten").
- **Objection:** to prevent a specific use of their data.
- **Restriction of processing:** to restrict the use of their data in certain circumstances.
- **Portability:** to receive their data in a structured format and transfer them to another controller.
- **Withdrawal of consent:** to withdraw consent given at any time (for example, for location, interests or commercial communications), without affecting the lawfulness of processing carried out before its withdrawal.

In addition, from within the App itself the User may at any time: change their interests in Settings Interests; turn each type of notification on or off in Settings Notifications; withdraw location permission in their phone's settings; withdraw from an activity; and delete their account from Settings. They may also request deletion of their account without the App, as explained at zerosignal.app/support.

Rights may be exercised by email to hola@zerosignal.app, providing proof of the requester's identity.

The User also has the right to lodge a complaint with the Spanish Data Protection Agency (AEPD) if they consider that their rights have not been properly addressed.

9. Data security

ZeroSignal applies appropriate technical and organisational measures to ensure the security of personal data, preventing their alteration, loss, or unauthorised processing or access, in accordance with the GDPR. Among other measures, answers to sign-up forms are stored in encrypted form.

10. Minors

Registration with ZeroSignal is intended exclusively for persons aged 16 or over; persons under 16 may not register or use the App. Certain activities, in particular those of verified organisations, may require a higher minimum age.

11. Subscriptions and purchase data

If the User subscribes to ZeroSignal Premium, the following data are processed to manage the subscription: ZeroSignal user identifier, purchase and transaction identifiers, product and plan purchased, start, renewal and end dates, subscription status and store country. ZeroSignal does **not** receive or store card or other payment method details.

For this purpose, **RevenueCat, Inc.** is used as data processor; it manages the validation and status of subscriptions on behalf of ZeroSignal, in accordance with Article 28 of the GDPR.

Apple Inc. and **Google Ireland Limited** act as independent data controllers with regard to payment collection, invoicing and refunds, in accordance with their own privacy policies.

The legal basis for the processing is the performance of the subscription contract. These data are kept while the subscription is active and, thereafter, for the statutory tax and accounting retention periods.

ZeroSignal does not collect or manage payments for activities of verified organisations: any payment is made directly to the organisation, outside ZeroSignal.

12. Updates to the Privacy Policy

ZeroSignal may amend this Policy to adapt it to legal, technical or operational changes. Amendments will be published in the app and on the official website and, where they are substantial, will be communicated to the User through the App or by email with reasonable notice before they come into force.

See also the Legal Notice, the Cookie Policy and the Terms and Conditions.