

Privacy Policy

Effective Date: June 15, 2026 • Last Updated: June 15, 2026

Treyee (“Treyee,” “we,” “us,” or “our”) provides multiple software products, mobile applications, websites, and related services. This Privacy Policy explains how we collect, use, disclose, and protect personal information across Treyee’s products and services, including our websites, SaaS products, and mobile applications such as **Locuventus**.

This Privacy Policy is intended to serve as Treyee’s global privacy policy. Where a specific product or service has unique data practices, we describe them in a product-specific section below. Product-specific disclosures supplement the general sections of this policy and apply in addition to them.

If you use a Treyee product, website, mobile app, or service, this Privacy Policy applies unless a different privacy notice is expressly provided for that service.

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1. Scope of This Policy

This Privacy Policy applies to personal information collected through:

- Treyee websites and landing pages
- Treyee SaaS products and web applications
- Treyee mobile applications
- Customer support, sales, onboarding, and business communications
- Product analytics, diagnostics, authentication, and security systems

This policy does **not** apply to third-party services that you access through our products, including external payment, rideshare, transit, mapping, or authentication services where their own privacy notices apply.

2. Who We Are

One Two Three GT, Ltd. (DBA Treyee) is the operator of the products and services covered by this Privacy Policy.

Email: privacy@treyee.io

Website: <https://treyee.io>

Address: 1111B S Governors Ave STE 25564, Dover, DE 19904

Phone: +1 (302) 208-6678

If Treyee designates a Data Protection Officer or local representative in a specific jurisdiction, we will identify those details in a supplemental notice where legally required.

3. Information We Collect

Depending on the product or service you use, we may collect the following categories of information.

3.1 Information You Provide Directly

- Name, display name, or username
- Email address and other contact details
- Account credentials, including passwords in hashed form
- Company, billing, and account profile details
- Language preferences and profile settings
- Content you submit through forms, support tickets, onboarding flows, or in-product features
- Optional profile information you choose to provide

3.2 Information Collected Automatically

- Device type, operating system, browser type, and app version
- IP address and approximate region
- Usage activity such as page views, feature use, search activity, clicks, session duration, and interactions

- Log files, crash reports, diagnostics, and performance telemetry
- Security events such as login attempts and fraud-prevention signals
- Push notification tokens and notification preferences

3.3 Sensitive or Higher-Risk Data

Some Treyee products may process data that requires additional transparency or consent, such as:

- Precise geolocation data
- Live location sharing between users
- Optional profile attributes that may reveal preferences, affiliations, or community participation

Where required, we provide additional in-app disclosures, consent requests, or product-specific explanations before collecting or transmitting this type of data.

3.4 Information From Third Parties

We may receive information from service providers, integration partners, identity providers, analytics platforms, mapping providers, advertising tools, and publicly available sources when necessary to operate or improve our services.

4. How We Use Information

We use personal information to:

- Provide, maintain, and improve Treyee products and services
- Create and manage user accounts
- Authenticate users and secure access to services
- Deliver requested features and functionality
- Personalize user experience, preferences, and language settings
- Provide customer support and respond to inquiries
- Monitor usage, diagnose errors, and improve performance
- Send service-related communications, alerts, and product notices
- Protect against fraud, abuse, unauthorized access, and security incidents
- Measure product usage and business performance
- Comply with legal obligations and enforce our terms

We do **not** sell personal information to data brokers or unrelated third parties for their own independent marketing use.

5. Legal Bases for Processing

Where applicable under laws such as the GDPR, we rely on one or more of the following legal bases:

- **Consent** — for optional features, certain device permissions, or specific data processing activities

- **Contract performance** — to provide the product or service you requested
- **Legitimate interests** — for service improvement, analytics, security, fraud prevention, and internal administration
- **Legal obligation** — where processing is required by law

If we rely on consent, you may withdraw that consent at any time, subject to legal or operational limitations.

6. How We Share Information

We may share personal information in the following circumstances:

6.1 Service Providers

We use vendors and infrastructure providers to support our operations, such as hosting providers, analytics vendors, authentication platforms, mapping providers, communication tools, and customer support systems. These providers process information on our behalf under contractual restrictions.

6.2 Business Customers and Administrators

For certain Treyee SaaS products used by organizations, account owners or administrators may be able to access information associated with their managed accounts, subject to product functionality and contractual terms.

6.3 Product-Specific User Sharing

Some products include collaborative or community features where information is intentionally shared with other users based on your settings and actions. Product-specific sections below explain those disclosures.

6.4 Legal and Safety Reasons

We may disclose information if required by law, regulation, court order, or governmental request, or where necessary to protect users, Treyee, or the public from fraud, abuse, security threats, or harm.

6.5 Corporate Transactions

If Treyee is involved in a merger, financing, acquisition, reorganization, sale of assets, or similar transaction, personal information may be transferred as part of that transaction, subject to applicable law.

7. Retention

We retain personal information for as long as necessary to provide services, comply with legal obligations, resolve disputes, enforce agreements, and protect our legitimate business interests.

Retention periods vary by product and data type. When a product has a more specific retention schedule, that schedule appears in the product-specific section below. If no specific retention period is stated, we retain data only for the period reasonably necessary for the purposes described in this policy.

8. Security

We implement reasonable technical, administrative, and organizational safeguards designed to protect personal information, including:

- Encryption in transit using HTTPS/TLS
- Access controls and role-based permissions
- Authentication and session security controls
- Logging, monitoring, and security review processes
- Vendor and infrastructure controls appropriate to the services provided

No method of transmission or storage is completely secure. We cannot guarantee absolute security.

9. International Transfers

Treyee operates internationally and may process information in countries other than the one where you live. Where required, we take steps intended to provide an appropriate level of protection for transferred data.

10. Your Rights and Choices

Depending on your location and applicable law, you may have the right to:

- Access personal information we hold about you
- Correct inaccurate or incomplete information
- Delete your information
- Restrict or object to certain processing
- Withdraw consent where processing is based on consent
- Request portability of certain data
- Manage permissions such as location or notifications through device or product settings
- Lodge a complaint with a competent supervisory authority

To exercise privacy rights, contact us at privacy@treyee.io. We may need to verify your identity before processing a request.

11. Children's Privacy

Treyee products are not intended for children under the minimum age specified for the relevant product. Unless otherwise stated in a product-specific section, our services are not intended for children under 16, and we do not knowingly collect personal information from individuals below that threshold.

If you believe a child under the applicable minimum age has provided personal information to us, contact us at privacy@treyee.io so we can investigate and delete the data where appropriate.

12. Third-Party Services and Links

Our products may link to or integrate with third-party services. Their privacy practices are governed by their own notices and policies, not this Privacy Policy. We encourage you to review those third-party policies before using the associated services.

13. Changes to This Policy

We may update this Privacy Policy from time to time to reflect changes in our products, legal obligations, or business operations. When we make material changes, we will revise the “Last Updated” date and, where required, provide additional notice through our website, applications, or email.

14. Product-Specific Disclosures

The following sections apply to specific Treyee products and supplement the general policy above.

15. Locuventus Product Addendum

Locuventus is a Treyee event-focused mapping application designed to help users navigate venues, transit, points of interest, and event activity. Locuventus includes location-based and community features that require additional disclosures.

15.1 Account Requirement

A user account is required to access Locuventus. Locuventus collects:

- Email address
- Password in hashed form
- Display name or username
- Language preference
- Optional profile photo
- Optional nationality and team or fan affiliation for community features
- Authentication and login metadata through **Auth0**

15.2 Location Data

Locuventus may collect the following location-related information:

- **Precise location** while the app is in active use, to provide navigation, route guidance, ETAs, nearby events, and map functionality
- **Live location sharing**, only if you opt in to friend-group or community sharing features
- **Aggregated and anonymized movement data** used to improve routes, identify congestion patterns, and improve operational insights

By default, precise location is intended for foreground use while the app is open and active. If Locuventus introduces any feature requiring broader or background location access, we will provide the relevant disclosures and request permission in accordance with platform rules.

15.3 Community and Social Features

Locuventus may allow users to:

- Join friend groups
- Share live location with selected participants
- Check in at venues or events
- Participate in fan-cluster or community layers based on selected nationality or team affiliation

These features are **optional**. Information shared through them is governed by your settings, participation choices, and feature design. Where data is shown to other users, we aim to limit exposure to what is necessary for the feature to function.

15.4 Device, Diagnostics, and Messaging

Locuventus uses **Firebase** for certain app functionality, such as analytics, crash reporting, and push notifications. This may include:

- App usage events
- Crash and diagnostic information
- Device and installation identifiers
- Push notification tokens and preferences

15.5 Service Providers and Integrations

Locuventus may rely on the following categories of providers and integrations:

- **Auth0** for authentication and identity management
- **Firebase / Google** for analytics, crash reporting, and push notifications
- **Mapping providers** such as Google Maps for map display and routing support
- **Rideshare or mobility partners** such as Uber or Lyft for deep-link routing and destination handoff
- Hosting, infrastructure, and support vendors used by Treyee

Treyee requires these providers to process data only as needed to support the service, subject to their contractual and legal obligations.

15.6 Advertising and Sponsored Content

Locuventus may include sponsored pins, featured zones, or promoted event content. Treyee does **not** sell users' precise location data. If sponsor reporting is provided, it is intended to rely on aggregated and anonymized information rather than individually identifiable location histories.

15.7 Retention for Locuventus

Unless a longer period is required for legal, safety, or operational reasons, Locuventus generally applies the following retention approach:

- **Navigation-session precise location:** not retained after the active session unless needed for immediate service delivery
- **Live-sharing location:** available during the active sharing session and not retained beyond the session unless clearly disclosed
- **Aggregated/anonymized analytics and operational data:** retained for a limited period appropriate to analytics and service improvement needs
- **Account data:** retained until account deletion and for a limited post-deletion period as necessary for compliance, dispute resolution, or fraud prevention
- **Crash and analytics data:** retained according to vendor configuration and operational needs

15.8 Minimum Age for Locuventus

Locuventus is intended for individuals **16 years of age and older**.

15.9 Contact for Locuventus

For privacy questions specifically about Locuventus, contact: privacy@treyee.io

16. Additional Product Addenda

As Treyee launches or acquires additional products, we may add product-specific disclosures to this Privacy Policy so that a single policy can continue to cover multiple services while remaining clear and accurate.