



Privacy Notice and Consent

In this Privacy Notice, we would like to explain how we process your **personal data** when you use the Transporeon application (“App”) on your smartphone or tablet (“Device”).

Please ensure to check the following link for the most recent version of our Privacy Notice:
https://legal.transporeon.com/DP/APP/EN_Transporeon_App_Privacy_Notice.pdf

Introduction

By clicking “Accept” you declare that you have read the following statements and that you consent to the processing of the below-mentioned personal data in accordance with Art. 6 Para. 1 clause 1 lit. a General Data Protection Regulation. Without your consent by clicking on “Accept” you will not be able to use the App.

What is personal data?

The General Data Protection Regulation (GDPR) defines in Article 4 Paragraph 1 GDPR in its definitions what is meant by personal data:

“any information relating to an identified or identifiable natural person (hereinafter referred to as the “data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person; [...]”

It is only the data on vehicle location that are of interest for operation of the App, rather than your personal data. If you wish to avoid your private trips being tracked, we recommend that you leave the Device on which the App is installed in the vehicle or close the App when you are making private, non-official trips.

1 Name and contact details of the controller and data protection officer

This privacy notice applies to data processing by the controller:

Transporeon GmbH
Heidenheimer Straße 55/1
89075 Ulm
Germany
+49 731169060
info@transporeon.com



Data protection officer of the controller

Data protection queries can be sent to the data protection officer at Transporeon via e-mail to dataprotection@transporeon.com or you can send your request by post to the following address:

Transporeon GmbH
Data Protection Officer
Heidenheimer Straße 55/1
89075 Ulm
Germany

2 Collection and storage of personal data while using the App

During use of the App the following personal data is processed:

- Location data (e.g. GPS location) of the Device
- Pseudonymized identification number (“Alias”)

The Alias is a pseudonymized identification number randomly generated by the App, which is displayed in the lower left corner of the App. It is generated individually and unique for each App Device. This creates the possibility of allocating you to the vehicle fleet of your carrier (your employer) or to allocate a transport (similar to the vehicle license plate number).

The data processing starts when you log on to the App and activate a transport (set the first status). The status of the allocated transport can then be tracked in real time by your carrier, the transport contractor (shipper) and, if applicable, the goods recipient involved in the specific transport allocation.

In case the first status of an allocated transport is configured as semi-automatic or automatic, the internal position gathering of the Device is started on login (and stopped on logout) but it is not made visible for the above mentioned parties as long as the transport has not been activated. In case the configuration is manual, the internal position gathering starts only with placing of the first status (see above).

As long as the App is running (from setting the first status until the last status is set), data on the current position of the Device and the activated status messages are sent to the platform of the controller at regular intervals and processed there as transaction data of the transport performed by you.

The purpose of processing this data includes an increase in the transparency of the transport process. This also covers the estimation of delays, the measurement of transport routes and the optimization of predictions for transport times (= “ETA” calculations). **The legal basis for data processing is your explicit consent in the App in accordance with Art. 6 Para. 1 clause 1 lit. a GDPR.**



Your personal data (including photos and signatures) will be deleted from the interactive applications of the platform latest after 90 calendar days. The data will be deleted from the active database of the platform latest after 3 calendar years after the transport process, whereby the 3-year period begins in the year after the transport process. After the expiry of this period we will lock the data and, after the expiry of the statutory retention periods applicable to us, we will completely delete it.

The interactive platform describes the platform in live operation. After the data are deleted there, they can only be seen by platform users through the Reporting Tool. The Reporting Tool can only be used by activated platform users, and they can only see that data for which they are otherwise authorized.

The tracking link is not stored in the Reporting Tool and thus deleted from the interactive applications on the platform after no more than 90 calendar days.

3 Further information about the App

If you use the photo or confirmation function (signature capture) of the App, the photos you have taken and the signatures uploaded to the platform of the responsible party will be made available to your carrier, the shipper and possibly the goods recipient.

If you downloaded the App from a third-party vendor rather than the Google Play Store/App Store, we will need your cell phone number or e-mail address to activate it. This data is only required to provide an activation code. It will be deleted immediately after transmission.

4 Disclosure of data

The following parties will receive your personal data:

- a) The controller and its affiliate companies listed below;
- b) The transport client (shipper);
- c) The transport contractor (carrier);
- d) Your employer or client, if not identical to c);
- e) The goods recipient, who may be identical to the transport client (see b));
- f) When recipients of the URL (“tracking link”) use Tracking & Visibility for route tracking – see **2 (Collection and storage of personal data while using the App)**.

We pass your personal data on to our affiliate companies, which are named in the following address: https://legal.transporeon.com/transporeon_entities.pdf

In addition, depending on the use of our services, we currently provide your personal data to the following service providers, which are named at the following address: https://legal.transporeon.com/transporeon_service_providers_app.pdf



The European affiliated companies of Transporeon and the affiliated companies outside of the European Union or the European Economic Area have implemented and transcribed the EU standard contractual clauses in order to guarantee an adequate level of data protection and to ensure compliance with the legal requirements of Art. 44 ff. GDPR.

The legal basis for data transmission is Art. 6 Para. 1 clause 1 lit. f GDPR. Our legitimate interest results from the possibility to support your use of the App worldwide and in a multitude of languages.

5 Cloudflare

Note: The service provider Cloudflare, Inc. ("Cloudflare") is used to accelerate the operation of the App. For example, the load distribution of the content is optimized ("Content Delivery Network"). For this purpose, the IP address of your Device is transmitted to Cloudflare. If the IP address is a Russian IP address, it will first be cached - together with your location data - on a Cloudflare server located in Russia. Afterwards the further transmission to us takes place. In order to ensure an adequate level of data protection, EU standard contract clauses have been implemented and the legal requirements of Art. 44 ff. GDPR have been ensured. This intermediate storage only takes place if your IP address is assigned to Russia. Should this not be the case, the data will be stored directly on our servers in Germany.

The legal basis for this data processing and transmission is Art. 6 Para. 1 clause 1 lit. f GDPR. Our legitimate interest results from the desire to offer the App on the Russian market. According to this, the Russian data protection law "on personal data (No. 152-FZ)" must be adhered as a basic requirement. In addition, the personal data is processed by us or Cloudflare anyway, so only the physical location of the servers or the data route is affected.

6 Rights of the data subject

Given below is information on your rights in connection with your personal data:

- According to Art. 15 GDPR, you may request information about your personal data processed by us. In particular, you can request information on the processing purposes, the category of personal data, the categories of recipients to whom your data has been disclosed, the planned retention period, the rights to rectification, deletion, limitation of processing, or objection, the existence of a right to complain, the source of the data, if not collected from us, and the existence of automated decision-making including profiling and, where appropriate, meaningful information about the details;
- According to Art. 16 GDPR, you may immediately demand the correction of incorrect or completion of incomplete personal data stored with us;
- According to Art. 17 GDPR, you may also request the deletion of your personal data stored by us, unless processing such data is required for the exercise of the right to freedom of expression and information, for the fulfilment of a legal obligation, for reasons of public interest, or for assertion, exercise or defense of legal claims;



- According to Art. 18 GDPR, you may request the limitation of processing of your personal data if the accuracy of your data is disputed, the processing is unlawful, but if you decline the deletion of such data and we no longer require the data, however you require the data for the assertion, exercise, or defense of legal claims, or if you have objected to the data processing in accordance with Art. 21 GDPR (see section 7 (Right to object));
- According to Art. 20 GDPR, you may receive your personal data provided to us in a structured, standard and machine-readable format or require it to be forwarded to another controller;
- According to Art. 7 Para. 3 GDPR, you may revoke your consent previously given to us at any time. As a result, we are not permitted to continue the data processing based on this consent for the future and
- According to Art. 77 GDPR, you may complain to a supervisory authority. You are normally permitted to contact the supervisory authority of your usual place of residence or workplace or our registered office (see https://www.bfdi.bund.de/DE/Infothek/Anschriften_Links/anschriften_links-node.html - only available in German).

7 Right to object

If your personal data is processed based on legitimate interests in accordance with Art. 6 Para. 1 clause 1 lit. f GDPR, you have the right to file an **objection** against processing of your personal data in accordance with **Art. 21 GDPR** provided that there are reasons for this arising from your particular situation. If you would like to exercise your right of revocation or objection, please send an e-mail to dataprotection@transporeon.com.

8 Other questions

If you have further questions about your personal data that were not answered here, please contact us at dataprotection@transporeon.com.