



# Privacy Notice

In this Privacy Notice, we would like to explain how we process your **personal data** when you use the platform and its functions.

## Introduction

### What is personal data?

The General Data Protection Regulation (GDPR) defines in Article 4 Paragraph 1 General Data Protection Regulation 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; [...]”*

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

This privacy notice applies to data processing by the controller:

Transporeon GmbH  
Magirus-Deutz-Straße 16  
89077 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](mailto:dataprotection@transporeon.com) or you can send your request by post to the following address:

Transporeon GmbH  
Data Protection Officer  
Magirus-Deutz-Straße 16  
89077 Ulm  
Germany

## 2. Collection and storage of personal data and the nature and purpose of its use

### 2.1. When visiting the platform

When you visit our Platform, the browser used on your device automatically sends information to the server of our Platform. This information is temporarily stored in what is referred to as a log file. The following information will be collected without your intervention and stored until automated deletion at the latest 1 calendar year after the last login:

- IP address of the requesting computer,
- userID (including corresponding e-mail address upon incorrect login),
- Date and time of access,
- Name of the accessed URL,
- Website from which access is made (referrer URL),
- Browser used and, if applicable, the operating system of your computer as well as the name of your internet service provider.

The data given is processed by us for the following purposes:

- Ensuring smooth connection to the platform,



- Guarantee of convenient use of our Platform (e.g. By optimizing the presentation),
- Prevention of fraud and misuse of the Platform (e.g. through account sharing),
- Evaluation of system security and stability.

The legal basis for data processing here is Art. 6 Para. 1 clause 1 lit. f General Data Protection Regulation. Our legitimate interest arises from the data collection purposes listed above.

In addition, we use cookies relating to visits to our platform. Further details can be found in section 4 of this privacy policy.

## 2.2. When using the platform

The platform is a service that enables shippers, carriers, suppliers and goods recipients to optimise their logistics processes, especially through the exchange of transport data. The users of the platform are persons who work for such companies.

### 2.2.1. Which data do we process? – Platform user

The majority of the data on the platform is not personal data, but transport-related data. For example, this data could be routes, offers, or transport documentation.

We save transactions you carry out on the platform, for example, the placing or accepting of transport offers, changing of a transport status or booking of a time slot for the delivery of goods.

Furthermore, your following personal data will be recorded:

- First name
- Last name
- Business contact details

### 2.2.2. Which data do we process? – Truck drivers (e.g. driver of the transport)

The majority of the data on the platform is not personal data, but transport-related data. For example, this data could be routes, offers, or transport documentation.

Furthermore, your following personal data will be recorded:

- First name
- Last name
- Business contact details
- License plate
- Location data (GPS position)
- Pseudonymous identification number ("alias")

### 2.2.3. Why do we process your personal data?

We process transactions that you perform on the platform to provide transparency and traceability of the transport process to your company and your business partners (processing and placement of transport assignments).

The processing of your first name, last name, and business contact details takes place when using the platform (including access to the platform, communication with users, remote support and onboarding, information on updates and troubleshooting).

The legal basis for data processing is Art. 6 Para. 1 clause 1 lit. f General Data Protection Regulation and results from our legitimate interest in operating the platform.



#### 2.2.4. For what period of time will your personal data be saved?

Your personal data will be deleted from the interactive applications of the platform after no more than 90 calendar days. The data will be deleted from the active database of the platform after no more than 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 respective 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.

### 2.3. When registering for our newsletter

If you have expressly consented in accordance with Art. 6 Para. 1 clause 1 lit. a GDPR in the user menu under “Settings” or already in the Registration centre, we will use your email address to regularly send you our newsletter. This newsletter relates to the area of transport logistics process optimization for our affiliated companies named under section 3, and includes, for example, industry information, product updates, results of completed analyses, and case studies from reference customers.

#### 2.3.1. Revocation of consent / cancellation

You can revoke your consent to the sending of our newsletter at any time by unsubscribing. You can unsubscribe by clicking on the link provided in every newsletter e-mail, directly via “Settings” in the user menu, or by sending an e-mail to [unsubscribe@transporeon.com](mailto:unsubscribe@transporeon.com).

### 2.4. When using the Registration centre

The Registration Center is a website to register the platform and complete the contract related to it. On this website, you have the option to update your contract as well as make additional contracts. The Registration Center is used exclusively by carriers and suppliers.

We process all data requested there (such as first name, last name, business contact data, email address, telephone number) for the purpose of contract fulfillment in accordance with Art. 6 Para. 1 clause 1 lit. b General Data Protection Regulation; to permit you to use the platform and support you while using it or – if you are not the contractual partner – to safeguard our legitimate interests in the operation of the Registration Center in accordance with Art. 6 Para. 1 clause 1 lit. f.

### 2.5. When using the administration portal

On the administration portal (My Transporeon, My Mercareon), shippers, carriers, suppliers and goods recipients are given the opportunity to edit their data.

The main users of your business can view and access your personal data in order to manage the user accounts of your business. You and the main users can also see which transactions you and the main users have carried out on the platform.

In addition, you and the main users can edit your business phone and e-mail contact details as well as see and save invoices.

We process all data requested there (such as first name, last name, business contact data, email address, telephone number) for the purpose of contract fulfillment in accordance with Art. 6 Para. 1 clause 1 lit. b General Data Protection Regulation; to permit you to use the platform and support you while using it or – if you are not the contractual partner – to safeguard our legitimate interests in the operation of the Administration Portal in accordance with Art. 6 Para. 1 clause 1 lit. f.

## 3. Disclosure of data

If you carry out transactions with a different user on the platform, this user can see your first name, last name and business contact details. These business contact details are limited to those details necessary for the logistics process between you (or your company) and the company of this user. In addition, your personal data are also displayed to those companies with which you or your company are in a business relationship. They are also displayed to users with whom you are in contact through the platform’s messaging function.

We pass your personal data on to our affiliate companies, which are named in the following address: [https://legal.transporeon-group.com/transporeon\\_entities.pdf](https://legal.transporeon-group.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-group.com/transporeon\\_service\\_providers.pdf](https://legal.transporeon-group.com/transporeon_service_providers.pdf)



We process your personal data on servers based in Germany, unless otherwise stated. If you work with users from countries outside the European Union or the European Economic Area, they will see your above-named personal data through our platform.

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. General Data Protection Regulation.

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

## 4. Cookies

### 4.1. Session and Setting Cookies

We use session cookies on our Platform. These are small files that your browser automatically creates and that are stored on your device (laptop, tablet, smartphone, etc.) when you visit our Platform. Cookies do not harm your device, do not contain viruses, Trojans or other malicious software. The cookie stores information resulting in connection with the specific terminal used. However, this does not mean that we are immediately aware of your identity. The use of cookies serves to make using our online services more pleasant for you. And so we set so-called cookies to authenticate you. In addition, we also use temporary cookies that are stored on your device for a specified period of time. If you visit our Platform again to use our services, we automatically recognize that you were already on our site and note what language you chose, so you will not have to enter it again. These cookies are automatically deleted after a defined time. The data processed by cookies is required for the purposes of safeguarding our legitimate interests as well as those of third parties pursuant to Art. 6 Para. 1 clause 1 lit. f General Data Protection Regulation.

### 4.2. Acceleration of the platform through Akamai

We use delivery, security, and analysis services from Akamai Technologies Inc., 150 Broadway, Cambridge, MA, 02142, USA ("Akamai"). These services use cookies, text files, beacons, and browser interfaces that generate log files that permit Akamai (i) to deliver the platform quickly, reliably, and securely (ii), perform analyses on the performance of the platform and the related user experience (iii), conduct security analyses (iv) and prevent unallowed access to the platform (v), and create reports about (i) to (iv) for its customers. The log files that are generated can contain personal data in the form of IP address, activities on the platform and evaluation of your use of the platform. Akamai can pass these data on to third parties if Akamai is legally required to do this or if the third parties process these data on assignment from Akamai. Akamai can transfer the data to its server as well as store and process it there. The Akamai servers are located mainly in the USA. Akamai makes sure that the transfer of personal data of EU citizens outside the European Economic Area meets the requirements of the relevant data privacy laws. For this purpose, Akamai has implemented legally recognized transfer mechanisms: the EU standard contract clauses. Akamai does not use the data to identify natural persons or for profiling of natural persons.

The legal basis for data processing is Art. 6 Para. 1 clause 1 lit. f General Data Protection Regulation and results from our legitimate interest in a platform that can be reached quickly worldwide along with the related security analyses.

More information on the terms of use for processing personal data by Akamai and on the Akamai data privacy guidelines can be found at <https://www.akamai.com/us/en/privacy-policies/>.

### 4.3. Use of Google reCAPTCHA

We use "Google reCAPTCHA" (hereafter "reCAPTCHA") in our Registration Center as well as on our platform. The supplier is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland ("Google"). reCAPTCHA checks whether the data entry in our Registration Center (e.g. in the registration form) and on our platform (e.g. on the login page) was made by a person or by an automated program (e.g. bot). To do this, reCAPTCHA analyzes the behavior of your visit using various characteristics. This analysis begins automatically as soon as you visit our Registration Center or our platform. In the analysis, reCAPTCHA analyzes various types of information (e.g. IP address, your length of stay on the platform, or the mouse movements you made). The data recorded in the analysis is passed on to Google. The data is processed by Google inside the European Union and possibly also in the USA. For this purpose, Google has implemented legally recognized transfer mechanisms: the EU standard contract clauses.

The legal basis for processing the data is Art. 6 Para. 1 clause 1 lit. f General Data Protection Regulation and results from our legitimate interest to protect our Registration Center and our platform from the misuse of automated spying, automatic registration, and spam.

The reCAPTCHA analyses run completely in the background. You as user are not informed that an analysis is taking place. Further information on Google reCAPTCHA as well as Google's data privacy statement can be found at: <https://policies.google.com/terms?hl=en> and <https://policies.google.com/privacy?hl=en>.



## 5. Statistics

For statistical purposes we use the open source software “Matomo” for the analysis and statistical evaluation of the use of the platform. Matomo does not transfer any data to servers that are not controlled by us. Instead, it is completely hosted by the controller (“on premise”). We setup Matomo that no cookies are used and your IP address will be immediately anonymized by 2 bytes. Only a “digital fingerprint” is used to detect, if you are an existing visitor or visited the platform before. In order to do this, a unique string for a visitor based on your operating system, browser, browser plugins, IP address and browser language is calculated. The “digital fingerprint” is only valid for 24 hours maximum and is then rotated, meaning the same unique visitor will have a different fingerprint the next day. The fingerprint randomly changes and is anonymized every 24 hours. The information we collect relate to your visit of our platform (e.g. URL of page visited, date and time, page which referred to the current page) and about your browser and device (e.g. browser type, version of operating system). We delete the analytics data about your visit after 12 months. The usage of Matomo is based on Art. 6 Para. 1 clause 1 lit. f General Data Protection Regulation. With the statistics we want to ensure a needs-based design and the continuous optimization of our platform. Furthermore, we use the evaluation to better understand how our platform is used (e.g. which pages are visited often, how user navigate through the platform, what devices are used) and to improve it (e.g. by focusing on content that is popular or to optimize workflows or adjust the platform to specific browsers and device types). Our interests are to be regarded as justified based on the aforementioned General Data Protection Regulation provision. Further information on Matomo as well as their privacy settings can be found at: <https://matomo.org/docs/privacy/>.

## 6. Rights of the data subject

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

- According to Art. 15 General Data Protection Regulation, 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 General Data Protection Regulation, 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 General Data Protection Regulation, 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 General Data Protection Regulation (see section 7. (Right to object));
- According to Art. 20 General Data Protection Regulation, 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 General Data Protection Regulation, 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 General Data Protection Regulation, 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](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 General Data Protection Regulation, you have the right to file an objection against the processing of your personal data in accordance with Art. 21 General Data Protection Regulation provided that there are reasons for this arising from your particular situation, or the objection relates to direct advertising. In the latter case, you have a general right of objection, which is implemented by us with no requirement to give a specific reason. If you would like to exercise your right of revocation or objection, please send an e-mail to [dataprotection@transporeon.com](mailto:dataprotection@transporeon.com).

## 8. Singapore “Personal Data Protection Act 2012”

This data privacy statement is based on the General Data Protection Regulation. This data privacy statement may continue to apply for all personal data collected, used, transferred or otherwise processed in Singapore in the framework of the “Personal Data Protection Act 2012 (“PDPA”)”. In this case, the following supplement is applied: [https://legal.transporeon-group.com/DP/SGP/Singapore\\_Privacy\\_Policy.pdf](https://legal.transporeon-group.com/DP/SGP/Singapore_Privacy_Policy.pdf)



Confidential 

Privacy Notice

## 9. Other questions

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