PRIVACY POLICY FOR THE USE OF AUTOLOGG

We attach great importance to your privacy and your personal data. We therefore process your data exclusively on the basis of the applicable statutory regulations, in particular the Austrian Data Protection Act - DPA, the EU General Data Protection Regulation (GDPR) as well as the Austrian Telecommunications Act (TCA).

We may act as a controller or processor when processing your personal data. This privacy policy informs you how we process your personal data (e.g. name, e-mail, IP address) as a controller when you **use AutoLogg** and what your corresponding rights are. This privacy policy may be complemented by additional privacy information, terms or hints we provide to you.

If you use AutoLogg via a contract managed by a third party (e.g., the organization for which you work, such as your employer), the third party or organization ultimately makes the decision about the purposes for which the data is used and/or how the system is designed or configured in detail (including tailor-made advanced services). In these cases, the third party or organization is the controller within the meaning of the GDPR and we act as a processor. For more information about the processing of your personal data, please contact your organization in this case.

1. Controller

AutoLogg GmbH, Muehlstrasse 21, A-4614 Marchtrenk, T +43 1 2057735348, office@autologg.com (referred to below as „AutoLogg“, „we“ or „us“).

Contact details of the data protection officer: T +43 1 2057735348, privacy@autologg.com.

2. Processing of personal data, purposes and legal basis

2.1. Processed data

When you use AutoLogg, we process certain personal data, whereby the specific data processed depends on how you interact with us or AutoLogg.

2.1.1. Data you provide to us

If you provide us with data, this may include the following information:

- Identity and contact data such as first and last name, email, address, AutoLogg ID (when using Autologg Connected, the ID will be automatically generated and added by us), if applicable, company;
- Vehicle data such as brand, model and series of the vehicle, initial mileage, vehicle plate number – when using the AutoLogg-Dongle and AutoLogg Connected also the VIN (Vehicle Identification Number);
- Password (encrypted and hashed);
- Logbook entries such as destination, type of the trip (business or private), purpose of the trip (if applicable, work trip for users in Germany), business partners and notes;

- Data on added hotspots (optional when using the hotspot feature) such as title of the hotspot, address, GPS-coordinates, business partner, purpose and notes added to the hotspot;
- Order and contract data relating to the purchase of AutoLogg, in particular the subscription period;
- Correspondence data (support cases), when you contact us (e.g. via the Chat function (Chatbot), via the contact form on the website, by e-mail, by telephone or by other means) and the data included in the correspondence with us.

2.1.2. Data from the use of AutoLogg in the vehicle, the AutoLogg Mobile App or the AutoLogg Portal

If AutoLogg is activated in the vehicle, the following trip data is automatically collected and processed by us:

- Date of the trip, trip duration (time), starting point of the trip, trip destinations and routes (GPS coordinates) as well as start and end mileage;
- Position of the vehicle after the last trip (GPS coordinates).

  When using the AutoLogg-Box or the AutoLogg-Dongle, we receive this data directly via the AutoLogg-Box or the AutoLogg-Dongle connected in the vehicle. When using AutoLogg Connected, we receive this data either via our partner High Mobility (if necessary, after the trip data have been released for AutoLogg) or, for customers with Mercedes vehicles, from Mercedes-Benz Connectivity Services GmbH.

Furthermore, when using the AutoLogg Mobile App or the AutoLogg Portal (logbook.autologg.com), we automatically process the following information including cookies:

- Device and session information such as browser type and –version, model of mobile phone and generic device identification, operating system used, website from which our site was accessed (referrer URL), subpage that you visit, date and time of access, IP address of the requesting device, user-id;
- Preference settings (country selection);
- Log-in-data (IP address, time, date of the action performed); the following cookies are used when you log in with my.autologg.com or logbook.autologg.com:

Name:	Description:
AUTH_SESSION_ID	Current session ID (storage period: 1 month after last login)
KEYCLOAK_IDENTITY	Access-Token (storage period: 1 month after last login)
KEYCLOAK_SESSION	KeyCloak Session-ID (storage period: 1 month after last login

  Cookies are small text files that are temporarily stored on your device (e.g. notebook, tablet, smartphone) via your browser when you visit our website. The next time you visit our site, your browser will access the relevant cookie(s) and send them to the site's server. You can prevent the use of cookies by selecting the appropriate settings on your browser; however, please note that in this case, you may not be able to make full use of all the functions provided on this website or you may not be able to use the site at all.

When you log in to AutoLogg via Apple, Google Social Login or the Microsoft Login, we receive the following data from the corresponding service provider:

- Apple Inc, One Apple Park Way; Cupertino, CA 95014, USA ("Sign in with Apple"): Name and email address (can also be hidden).
- Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland ("Google"): First and last name, email address.

- Microsoft Corporation, One Microsoft Way. Redmond, WA 98052-6399, USA: email address.

In the event that the vehicle is shared with other drivers and AutoLogg is enabled, you must notify these drivers that the vehicle's trip and vehicle data is being collected by the vehicle and that you have access to the respective reports.

2.2. Why we process your data

Depending on how you interact with us or AutoLogg, we process data in order to

- Activate your access to AutoLogg and provide and manage its use (including registration/activation of AutoLogg, availability check of AutoLogg for the particular vehicle, creation and management of logbook entries, authentication of access);
- Enable you to use the hotspot function;
- Enable you to use the live tracking function at your request;
- Display statistics to you;
- Provide you with technical or other support to ensure that AutoLogg remains functional and secure;
- Provide you with a smooth connection experience, to further improve the quality and performance of AutoLogg and make it more user-friendly, to find and fix bugs faster, and to improve system security and stability;
- Provide you with customized or enhanced services, if any;
- Assert, exercise or defend our legal rights or comply with our legal or regulatory obligations, as applicable.

Do you need to provide us with personal data?
The processing is necessary to achieve the above-mentioned purposes. If you do not provide us with certain data (e.g. the data we require in the course of activating AutoLogg), this may have the consequence that we cannot conclude the contract with you, cannot provide the requested service, cannot take the requested pre-contractual measures or cannot fulfill the stated purposes in accordance with the contract or the law. If, for example, you do not wish to provide us with personal data that we will only process with your consent, you can still use AutoLogg; however, we will then not be able to offer you certain services that require your consent.

2.3. Legal basis

We process your personal data on the basis of the implementation of pre-contractual measures and performance of a contract in accordance with Art. 6(1)(b) GDPR, on our legitimate interests pursuant to Art. 6(1)(f) GDPR or, in case of your consent, on Art 6(1)(a) GDPR. Our legitimate interests lie in ensuring smooth operation and improvement of our business, secure business operations and compliance with all applicable laws.

3. Do we share your personal data?

Provided this is necessary and permitted to fulfill the above stated purposes, we may share personal data with other departments or companies affiliated with us within the EU (https://www.starlim-sterner.com/en/contact/company-sites/), who support us, for example, in keeping our accounts and complying with our legal and tax obligations, or to third parties such as legal advisers, tax advisers, auditors or other business partners. Furthermore, your personal data may also be processed on our behalf by our processors (e.g. IT service providers or providers of external data centers such as Amazon Web Services EMEA SARL – the data center is located in Frankfurt/Main, or Cloud-IAM Société par Actions Simplifiée). These processors are contractually obliged to comply with data protection regulations.

Except where otherwise stated in this Privacy Policy, we will not disclose your personal data to other recipients, unless this is necessary for the assertion, exercise or defence of legal claims or for the fulfilment of our obligations or in cases this is legally or officially obligatory. Possible recipients in this case may be legal representatives, competent authorities, offices and courts.

If the above-mentioned recipients are located in countries outside of the European Union or the European Economic Area (in so-called “third countries”), the local data protection laws may not offer the same data protection level as in your country of residence. For example, there may be a risk that your data could be collected and processed by local authorities and that your data subject rights could not be enforced. A transfer will therefore only take place in accordance with the statutory provisions if the European Commission has adopted an adequacy decision for the third country (this also includes, for example, a corresponding certification in accordance with the Data Privacy Framework – "DPF"), if appropriate safeguards have been agreed with the recipient (e.g. EU Standard Contractual Clauses), the recipient participates in an approved certification system, binding corporate rules according to Art. 47 GDPR exist or there is a derogation for specific situations according to Art 49 GDPR (e.g. the transfer is necessary for the performance of a contract between you and us or you have explicitly consented to the proposed transfer).

4. How long do we store your data?

Unless a different storage period is expressly stated, we will retain your personal data for as long as you have a valid AutoLogg contract to enable your use of our products. If certain data is no longer required for the above-mentioned purposes (e.g. because we no longer provide certain features), we will delete or anonymize this data after deactivation.

If our contractual relationship is terminated due to a termination of the subscription or the expiry of any minimum contract term, we will delete your data no later than 14 days after the termination of the contract takes effect. If the payable contract is paused due to a subscription pause and is not reactivated within a period of 10 years from the effective date of the subscription pause, the contract will automatically be terminated and we will delete your data no later than 14 days after this contract termination takes effect, unless you request us to delete your personal data at an earlier date.

Due to legal obligations (in particular retention obligations) or to protect against claims, to enforce claims (including our General Terms and Conditions) or to document compliance with legal requirements, it may also be necessary to continue to store your data. This data will be reduced to the necessary minimum.

5. Your rights

Under the GDPR, you have the following rights:

- Right to access the personal data concerning you that is being processed by us (Art. 15 GDPR) – note that you can also access your data at any thime in the AutoLogg App or the AutoLogg web portal;
- Right to rectification of inaccurate data (Art. 16 GDPR);
- Right to erasure (Art. 17 GDPR), where appropriate;
- Right to restriction of processing of your data (Art. 18 GDPR), where appropriate;

- Right to object to the data processing at any time on grounds relating to your particular situation (Art. 21 GDPR);
- Right to receive the personal data concerning you in a structured, commonly used and machine-readable format (Art. 20 GDPR), where appropriate;
- Right to withdraw consent declarations at any time without a reason in order to hinder further processing of your personal data that has been collected and usede based on a consent declaration;
- Right to lodge a complaint with the supervisory authority.

Please note that we may not always be obliged to comply with a request for erasure, restriction of processing, objection to processing or data transfer. This is subject to the legal requirements and an assessment in each individual case. In case of any questions concerning your personal data, contact us at privacy@autologg.com.

6. Miscellaneous

We may adjust this Privacy Policy if necessary. You will always find the latest version on our website.

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