

PRIVACY POLICY FOR THE USE OF AUTOLOGG

September, 2019

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**).

This privacy policy informs you how we process your personal data (e.g. name, e-mail, IP address) **when you use AutoLogg** (when you register with AutoLogg, when you use the AutoLogg online portal my.autologg.com, when you use our Mobile App or while using the vehicle) and what your corresponding rights are. This privacy information may be complemented by additional privacy information, terms or hints we provide to you.

Controller regarding AutoLogg: AMV Networks GmbH, Muehlstrasse 21, A-4614 Marchtrenk, T + 43 7243 585 96-70, office@amv-networks.com (referred to below as „AMV“, „we“ or „us“).

Contact details of the data protection officer:

T + 43 7243 585 96-70

datenschutz@amv-networks.com

Please note that when AutoLogg is used in conjunction with tailor-made advanced services compared to pure logbook keeping (e.g. the management tool), the customer (e.g. the vehicle owner or the organisation administering the contract) ultimately decides for what purposes the service is used and how the system is configured in detail. In these cases, the customer is therefore controller within the meaning of the GDPR. For further information, please contact your organisation.

1. Processing of personal data, purpose and legal basis

1.1. Visit of our website my.autologg.com

When you visit our website, the following data is automatically sent by your browser to the server of our website and temporarily stored in so-called “web server log files”:

- Browser type and –version;
- Model of mobile phone and generic device identification;
- Operating system used;
- Web site from which our site was accessed (Referrer URL);
- Subpage that the user visits;
- Date and time of access;
- Internet protocol (IP) address of the requesting Internet-enabled device.

Purpose of the processing:

The data is used to ensure a smooth connection, to further improve the website and make it more user-friendly, to find and correct errors more quickly and to evaluate system security and stability. The data will not be used to personally identify visitors of this website.

Legal basis:

The processing is based on our legitimate interests pursuant to Art. 6(1)(f) GDPR, resulting from the purposes of processing listed above.

1.2. Cookies on my.autologg.com

Purpose of the processing:

We use so-called cookies on our website. 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.

When you visit our website, only those cookies are set that are strictly necessary to operate the website or to provide a service on your express request. Apart from that, we process data via cookies only upon your prior consent.

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.

The following cookies are used:

Name	Beschreibung
autologg-id	User-ID; storage period: 2 days
autologg-token	Session-Token of user; storage period: 2 days

Legal basis:

The processing is based on our legitimate interests pursuant to Art. 6(1)(f) GDPR (optimization of the website and of the online service offers) or, where required, on your consent in accordance with Art 6(1)(a) GDPR.

1.3. Registration with AutoLogg and use of the AutoLogg online portal (my.autologg.com) and the Mobile App

Purpose of the processing

If you register with AutoLogg on my.autologg.com or when you use the AutoLogg online portal or the Mobile App, we process the following personal data that you (or the organisation you work for - e.g. your colleagues or superiors) made available to us:

- AutoLogg ID (when using AutoLogg Connected for Tesla*, the ID will be automatically generated and added by us)
- First name and surname
- Brand, model and series of the vehicle
- Initial mileage
- Vehicle number plate
- Password (encrypted)
- Email
- Address (optional)
- Log-in data (IP address, time, date of the action performed)
- Group information (optional in the AutoLogg online portal): group name, sent group invitations (time, user), accepted group invitations (time, user), shared hotspots, settings made in web portal.

In your profile via my.autologg.com or via the AutoLogg Mobile App, you also have access to the data generated during vehicle use, which are processed by us:

- Last position of the vehicle
- Mileage
- Statistics.

* Tesla is a third party brand that has no connection whatsoever to AutoLogg / AMV Networks GmbH.

Via the AutoLogg Mobile App, you can add important details to the recorded trip for the purpose of seamless logbook entries, which are then processed by us:

- Destination
- Type of trip (business or private)
- Purpose of the trip (if applicable, commuting distance for users in Germany)
- Business partner
- Notes.

You have access to and control over your data at all times. 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.

We process this data for the purpose of

- Registration (activation) of AutoLogg
- Availability check of AutoLogg for the respective vehicle
- Management of logbook entries
- Support.

Legal basis

The processing is based on 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 and secure business operations.

1.4. Use of AutoLogg in the vehicle

Purpose of the processing:

If you use AutoLogg while using the vehicle, we process the following personal data that you (or the organisation you work for - e.g. your colleagues or superiors) made available to us:

- Salutation
- First name and surname
- Company (optional)
- Address (optional; street, postcode, city, country)
- Email
- AutoLogg-ID (when using AutoLogg Connected for Tesla*, the ID will be automatically generated and added by us)
- Brand, model and series of the vehicle
- Initial and final mileage
- Vehicle Number plates
- Password (encrypted)
- Log-in data (IP address, time, date of the action performed).

AutoLogg also collects the following information, which we process:

- Date of the trip
- Travel duration (time)
- Starting point of the trip, destinations and routes (GPS coordinates)
- Start and end mileage.

We process this data for the purpose of

- Logbook entries
- Support.

Legal basis

The processing is based on the performance of a contract in accordance with Art. 6(1)(b) GDPR and on our legitimate interests pursuant to Art. 6(1)(f) GDPR (smooth and secure business operations).

2. Do we share your personal data?

Provided this is necessary and permitted to fulfill the above stated purposes, we may share personal data (this only concerns data like contact and/or invoice data; not any trip data) with other affiliated companies within the EU (<https://www.starlim-sterner.com/en/contact/company-sites/>) or to third parties such as legal advisers, tax advisers, auditors or other business partners (e.g. logistics partners for the execution and processing of deliveries).

Furthermore, your personal data may also be processed on our behalf by our processors (e.g. IT service providers). These processors are contractually obliged to comply with data protection regulations.

If you use AutoLogg through an AutoLogg contract managed by the organisation for which you work (e.g. your employer), your organisation will have access to the data required for the purposes of keeping the logbook described above. In addition, your personal data and certain usage data (e.g. last position of the vehicle, route, mileage, driving time) may be retrieved or shared with administrators authorized by your organisation for purposes such as compiling statistics, logbook exports, optimization, etc. This does not include GPS data (the exact route). For further information please contact your organisation.

AutoLogg can be used for the purpose of using a shared logbook when one or more vehicles in a group are shared, so that, your consent provided, other group members belonging to your group can view all journeys made within the group and which are not yet assigned (route, mileage, driving time) for the purposes of using the group function and administering the logbook entries, and possibly (e.g. in the case of small groups) be able to associate these with you personally. Therefore, you should always assign your trips immediately after their completion. Once the trips have been assigned, the other group members cannot access your trips; however, the administrators authorized by your organisation may have access to your trips marked as business trips (but not to the exact route). Your consent is voluntary if you wish to use the AutoLogg group function and it can be revoked at any time with effect for the future in the "My Membership" section. You can view the respective group members in the "My Membership" section. For further information please contact your organisation.

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

3. How long do we store your data?

The data generated by AutoLogg while using the vehicle or data added by you via the AutoLogg online portal (my.autologg.com or Mobile App) is stored until the end of each calendar year for the purpose of the driver's logbook. Unless a different storage period is expressly stated, your data will be deleted as soon as it is no longer required for the fulfillment of the abovementioned purposes, unless there are longer statutory retention periods or other (legally justified) purposes, which require a continued storage of your data.

4. 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);
- 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 used based on a consent declaration;
- Right to lodge a complaint with the supervisory authority.

In case of any questions concerning your personal data, contact us at datenschutz@amv-networks.com.

5. Miscellaneous

We may adjust this Privacy Policy if necessary.