

# PRIVACY POLICY

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 visit our **website** [www.autologg.com](http://www.autologg.com) (2.1., 2.2.), when you visit our **Facebook page** (2.3.), when you **order goods** (2.4.), when you contact us via our **contact form** (2.5.), when you register as an **agent** of AutoLogg (2.6.), when you register as a **tax consultant** with AutoLogg (2.7.), when you use our **online-appointment tool** with Calendly (2.8.) or if you **apply for a job** (2.9.) and what your corresponding rights are. This privacy information may be complemented by additional privacy information, terms or hints we provide to you.

Additionally you will find on our website:

- Privacy information for the **use of AutoLogg**;
- General privacy information for **business partners or their employees**;

## 1. Controller:

AutoLogg GmbH, Muehlstrasse 21, A-4614 Marchtrenk, T +43 1 2057735348, [office@autologg.com](mailto: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](mailto:privacy@autologg.com)

## 2. Processing of personal data, purpose and legal basis

### 2.1. Visit of our website

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.

## **2.2. Cookies and similar technologies**

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.

We classify the cookies we use into the following categories, depending on their purpose: (1) Essential cookies, which allow us to perform essential functions and are necessary for the proper operation of the website, (2) Marketing cookies, to display personalized advertising to you, and (3) External media, which relate to content from video platforms and social media platforms.

For more information about the cookies used on our website, in particular their purpose and storage period, please see below and in the cookie settings.

When you visit our website, only those cookies are set without your consent that are strictly necessary to operate the website. Apart from that, we process data via cookies only upon your prior consent.

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.

Withdrawal of your consent (opt-out):

To the extent that the processing of cookie data is based on your consent, you can withdraw your consent at any time by using the corresponding opt-out options in the individual cookie settings (footer) and deactivate the respective service. The withdrawal of your consent does not affect the lawfulness of the cookie use until the withdrawal.

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.

### **2.2.1. Google Analytics**

Our website uses the service "Google Analytics" for the purpose of analyzing the use of the website by users. The service provider is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland ("Google"); Google's parent company is Google LLC (USA). As part of this service, data is or may be transferred to the USA.

This service uses cookies, text files which are saved on your device and enable the analysis of how you use this website. The information generated by the cookie about your use of the website is transmitted to a Google server and saved there. We use IP anonymisation, which means that within member countries of the European Union or states which are part of the European Economic Area your IP address is truncated by Google. Google uses the information in order to evaluate your use of our website, to create reports on website activities and in order to provide us with further services relating to website use and Internet use. Google will not associate the IP address transferred by your browser as part of Google Analytics with any other data held by Google for the purpose of personal identification. Privacy information of Google: <https://policies.google.com/privacy>.

You can prevent the use of cookies by selecting the appropriate settings on your browser; you can also prevent the collection of data generated by the cookie and related to the usage of the website (incl. your IP address) and the processing of the data by Google, by downloading and installing the browser plugin available under the following link: <http://tools.google.com/dlpage/gaoptout?hl=de>.

We also use Google Analytics to analyze data from AdWords and the Double-Click-Cookie for statistical purposes. If this is undesired, you can turn off this function in the Ads Settings (<http://www.google.com/settings/ads/onweb/?hl=en>).

Legal basis:

Consent, Data Privacy Framework ([DPF](#))

### **2.2.2. Google Ads**

Our website uses the service " Google Ads Conversion-Tracking" for the purpose of analyzing, optimizing and economically operating our website. The service provider is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland ("Google"); Google's parent company is Google LLC (USA). As part of this service, data is or may be transferred to the USA.

In case you have accessed our website through clicking on an ad served by Google, a conversion tracking cookie is set. These cookies expire after 30 days and are not used for personal identification of the user. If you visit certain pages of the website and the cookie has not yet expired, Google and we are able to recognize that you clicked on the ad and proceeded to that page. The information collected by the conversion cookie is used to provide aggregate conversion stats to Google Ads-customers who have opted-in

to conversion tracking. Ads-customers receive the total number of users who have clicked on their ad and who have been forwarded to a conversion tracking tag page. More information on these topics you will find here:

<https://policies.google.com/technologies/ads>.

Legal basis:

Consent, Data Privacy Framework ([DPF](#))

### **2.2.3. Microsoft Advertising**

Our website uses the service "Microsoft Advertising" (formerly Bing Ads) for the purpose of analyzing, optimizing and economically operating our website. The service provider is Microsoft Ireland Operations Limited (One Microsoft Place, South County Business Park, Leopardstown, Dublin, Ireland 18, D18 P521 ("Microsoft"); Microsoft's parent company is Microsoft Corporation (USA). As part of this service, data is or may be transferred to the USA.

Microsoft Bing Ads sets a cookie on your device for tracking purposes if you have been referred to our website via a Microsoft Bing ad. This enables Microsoft and us to recognize that someone has clicked on an ad and was then redirected to our website. We receive the total number of users who have clicked on their ad and who have been forwarded to a conversion tracking tag page. No personal data of the user will be submitted. You can prevent the use of cookies – e.g. by selecting the appropriate settings on your browser. More information on these topics and Microsoft Bing you will find here: <https://privacy.microsoft.com/en-us/privacystatement>.

Legal basis:

Consent, Data Privacy Framework ([DPF](#))

### **2.2.4. Google Tag Manager**

Our website uses the service "Google Tag Manager" for the purpose of managing tools and plugins. The service provider is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland ("Google"); Google's parent company is Google LLC (USA). As part of this service, data is or may be transferred to the USA.

Google Tag Manager is a tag-management-system that can be linked to Google Analytics to set up complex tracking tasks. Through the usage of Google Tag Manager, a cookie is set on your device when you visit our website.

This cookie collects information about the usage of the website in order to identify extra popular sections of the website. These cookies expire after 10 minutes. The collected data does not include personal data.

Legal basis:

Consent, Data Privacy Framework ([DPF](#))

### **2.2.5. Facebook-Plugins (Like- or Share-Button)**

Our website uses plugins of the social network "Facebook". This gives users of our website the opportunity to share content from our website within Facebook (using the "Like" or "Share" button). The service provider is Meta Platforms Ireland Limited, Block J, Serpentine Avenue, Dublin 4, Irland („Meta“); Meta's parent company is Meta Platforms, Inc. (USA). As part of this service, data is or may be transferred to the USA.

You can recognize these plug-ins by the Facebook logo or the "Like-Button" on our page. When you visit our website, a direct link is established between your browser and the Meta server. Meta will then receive information that you with your IP-address have visited our page. When you click the "Like-Button" while you are logged in with your Facebook account you can link our page contents with your Facebook profile. This way Meta can correlate your visit to your user account. We want to inform you that we as provider do not have any knowledge of the transferred data nor do we know how Meta exploits these data. You find more information on these topics in Facebook's privacy statement. <https://www.facebook.com/policy.php>

If you do not want to enable Meta to associate your visit to our pages with your Facebook user account, please log out of your Facebook user account.

Legal basis:

Consent, Data Privacy Framework ([DPF](#))

### **2.2.6. X-Plugins**

Our website uses plugins of the social network "X". This gives users of our website the opportunity to share content from our website within X. The service provider is Twitter International Unlimited Company, One Cumberland Place, Fenian Street, Dublin 2, D02 AX07, Ireland ("Twitter"); X's parent company is X Corp. (USA). As part of this service, data is or may be transferred to the USA.

By using X and the function "Re-Post" the websites visited by you will be related to your X-account and released to other users. For this purpose data will be transferred to Twitter, resp. X.

We inform you that we as the provider of these websites have no knowledge of the contents of the transferred data or of the use Twitter, resp. X, makes with these data. For further information turn to Twitter's privacy statement on <https://twitter.com/privacy>.

Your privacy settings with Twitter can be altered with your account settings. >  
<http://twitter.com/account/Settings>.

Legal basis:

Consent, Data Privacy Framework ([DPF](#))

### 2.3. Facebook page

If you visit our page "AutoLogg" on the social network "Facebook", personal data will be processed in connection with this visit. The service provider is Meta Platforms Ireland Limited, Block J, Serpentine Avenue, Dublin 4, Irland („Meta“); Meta's parent company is Meta Platforms, Inc. (USA). As part of this service, data is or may be transferred to the USA.

Please note that Meta collects and processes certain information regardless of whether you are registered or logged in with Facebook or not. Information about Meta's processing of personal data can be found in the Privacy Notice (<https://www.facebook.com/policy.php>) and the Cookie Guidelines (<https://www.facebook.com/policies/cookies/>). Please note that we have no control over the Meta Privacy Policy, Cookie Policy, or Terms of Use.

We operate our Facebook page to present our company and to and communicate with Facebook users and visitors of our Facebook page. The operation of our Facebook page is therefore based on our legitimate interest pursuant to Art(6)(1)(f) GDPR (information and interaction opportunities for and with our users and visitors; handling of sweepstakes). For this purpose, we process personal data (such as your user name, content and time of your messages, any comments made, likes) if you write us a message and/or comment on, share or otherwise respond to one of our posts, or if you take part in a sweepstake via Facebook and we then interact with you (e.g. by replying to your messages). We will provide you with information on the processing of personal data in connection with our sweepstakes separately. You decide which additional information is visible to us in your public profile on Facebook in the settings in your Facebook profile.

Meta provides us with anonymous statistics on the use of our Facebook page using the "Facebook Insight" function. This data is collected with the help of cookies and processed by Meta in personalized form; we do not have access to this data in personalized form.

These cookies provide us with statistics (such as total number of page views, information about "likes", page activity, followers, reach, demographics) that help us to manage and improve the marketing of our own activities. With regard to this processing, we are considered a **joint controller with Meta** within the meaning of Art. 26 GDPR. The main content of the agreement between the joint controllers is made available by Meta at [https://www.facebook.com/legal/controller\\_addendum](https://www.facebook.com/legal/controller_addendum).

The cookies are stored for up to two years after setting or updating these cookies. Stored cookies can be deleted at any time. You can prevent the installation of cookies by making the appropriate settings in your browser.

The processing of the Insights data provided to us is carried out in our legitimate interest in accordance with Art. 6 para. 1 lit. f GDPR (target group-specific control of advertising).

Meta is primarily responsible for the processing of Insights data and the fulfillment of your rights under the GDPR. For requests to exercise your rights as a data subject (see below) and to withdraw your consent, please use the forms linked in Meta's data protection information on Insights data ([https://de-de.facebook.com/legal/terms/information\\_about\\_page\\_insights\\_data](https://de-de.facebook.com/legal/terms/information_about_page_insights_data)) or contact Meta Platforms Ireland Limited, Block J, Serpentine Avenue, Dublin 4, Ireland by letter.

## **2.4. Orders**

Purpose of the processing:

If you order AutoLogg in our webshop at <https://www.autologg.com/shop/autologg-box/> or by other means (e.g. via the Amazon marketplace), we process your personal data which have been communicated to us together with the order (e.g. title, first name, surname, company (optional), contact data or payment information) as well as other transaction-related data (order number, order date, order quantity, estimated delivery time, purchased product, price, shipping method, shipping costs (if invoiced), voucher code and voucher amount (if used)) for the purpose of processing the order (including delivery and invoicing).

In general, you have provided this data to us, we have received it from our partners (e.g. Amazon) or it was generated by us in the course of your order. However, we may have lawfully received this data from the company for which you are working for (e.g. your colleagues or superiors). The processing of this data is necessary for the conclusion of the contract. If you do not provide us personal data, this could mean that we cannot conclude a contract with you, cannot provide the requested service or cannot fulfil the stated purposes in accordance with the contract or the law.

We offer you efficient and secure payment options in our webshop and use banks or credit institutions as well as payment providers. The data processed by the payment provider includes basic data (such as name/company, address), payment data (such as account or credit card number, invoices), contract data (such as subject matter of contract, number and description of purchased products, duration), usage and communication data (such as visited websites, access times, IP addresses). This data is necessary to carry out the transaction. The entered payment data is only processed by the payment provider, i.e. we do not receive any account or credit card data, but only information with confirmation or negative information of the payment. The payment provider may independently carry out a risk and fraud examination to determine whether

the selected payment method can be offered, and may process further personal data for this purpose on its own responsibility. The terms and conditions and data protection information of the respective payment provider apply.

Used payment providers: PayPal (Europe) S.à r.l. et Cie, S.C.A., 22-24 Boulevard Royal, L-2449 Luxembourg; privacy information available at <https://www.paypal.com/de/webapps/mpp/ua/privacy-full>; Stripe Payments Europe Ltd, 1 Grand Canal Street Lower, Grand Canal Dock, Dublin, Ireland; privacy information available at <https://stripe.com/at/privacy>; Stripe's parent company is Stripe, Inc (USA). As part of this service, data is transferred to the USA or such a transfer cannot be ruled out.

If you order an AutoLogg dongle, the personal data collected by us will be passed on to the transport company commissioned with the delivery as part of the contract processing, insofar as this is necessary for the delivery of the goods. The order processing is carried out by WeShip Fulfillment GmbH, Frikusweg 10, 8141 Premstaetten, Austria.

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 as well as on our legitimate interests pursuant to Art. 6(1)(f) GDPR (customer service).

## **2.5. Request form**

Purpose of the processing:

If you get in touch with us using a form on the website, we will process the personal data provided by you (e.g. company, address, first name, surname, telephone, your request) for the purpose of contacting you and within the framework of the possible business relationship.

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 as well as on our legitimate interests pursuant to Art. 6(1)(f) GDPR (customer service).

## **2.6. Registration as an agent of AutoLogg**

Purpose of the processing:

If you register on our AutoLogg website as an agent, we process your personal data that you have provided to us in the form (e.g. company name, name, address and e-mail address) for the purpose of handling the registration, contacting you and sending you the agency agreement and the voucher code. The processing of this data is necessary for



the registration and sending of the contract and voucher codes. If you do not provide us with certain data, this could mean that we cannot conclude the contract with you, cannot provide the requested service or cannot fulfil the stated purposes in accordance with the contract or the law.

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.

## **2.7. Registration as a tax consultant with AutoLogg**

Purpose of the processing:

If you register as a tax consultant on our AutoLogg website, we process your personal data that you have provided to us in the form (e.g. tax consulting office, name, contact data, address, your message and whether an AutoLogg test box is desired or not) for the purpose of handling the registration, contacting you and sending you the voucher code and, if desired, for the purpose of delivering the AutoLogg test box. The processing of this data is necessary for the registration and sending of the voucher code or, if requested, for the delivery of the AutoLogg test box. If you do not provide us with certain data, this could mean that we cannot conclude the contract with you, cannot provide the requested service or cannot fulfil the stated purposes in accordance with the contract or the law.

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.

## **2.8. Online-appointment via Calendly**

Our website uses the service "Calendly" for the purpose of making appointments online. The service provider is Calendly LLC, 115 E. Main Street, Suite A1B, Buford, GA, 30518, USA ("Calendly"). As part of this service, data is transferred to the USA. The integration is done via a script in the source code on our website. If you use the appointment booking on our website, you automatically use the services of Calendly.com. Data such as name, IP address at the time of the appointment, the agreed date as well as the agreed time are transferred there. This data is not passed on to third parties and is only used for the administration and organization of the appointments as well as for internal statistics. By using the appointment booking service, you agree that you are in agreement with this. Here you can find more information from Calendly.com <https://calendly.com/pages/privacy>.

Purpose of the processing:

If you make an appointment with us via an appointment booking form on our website, we process those personal data that you have disclosed to us in the form (e.g. company, name, e-mail address, the agreed date, the agreed time, request) for the purposes of contacting you and, if necessary, for the transaction of business.

Legal basis:

We process your personal data based on your consent pursuant to Art 6(1)(a) in conjunction with Art 49 (1)(a) GDPR; Data Privacy Framework ([DPF](#)).

## **2.9. Applicants**

We appreciate your interest in working at AutoLogg. If you apply to us, we will process the personal data provided by you. This includes in particular your personal details (e.g. first and last name, title, date of birth, address, e-mail, telephone number, cover letter, CV), data on the selected vacancy or desired position (e.g. job title), as well as data on skills and qualifications (e.g. education, job experience, certificates, language skills). Please note that the specific data we process depends on your own information. We may also have lawfully received this data from third parties (e.g. personnel consultants or personnel provider).

Purpose of the processing:

Your personal data will be processed for the purposes of processing your application / checking your suitability for a job advertised, contacting and keeping records (in the case of your consent).

If an employment relationship is concluded, you will be informed separately about the processing of your personal data within the scope of your employment relationship.

However, it is necessary that you provide us specific personal data which is necessary to make a decision about the establishment of an employment relationship. Applicants are not obliged to disclose personal data, but if no personal data is provided, we will not be able to process the application. Please do not provide us with special categories of personal data in your application (e.g. religious beliefs or physical impairments), as we do not require it for the application process.

Should a legal dispute arise in the scope of the application procedure, the necessary personal data will be used for appropriate legal prosecution.

In the event that we intend to (further) process your data for other purposes, we will inform you separately and, if required by law, ask for your consent.

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 as well as on our legitimate interests pursuant Art. 6(1)(f) GDPR (evaluation of suitability for an employment relationship). Where applicable, the processing is based on Art. 6(1)(f) GDPR in conjunction with Art. 9(2)(f) GDPR (assertion, exercise or defence of legal claims). Only in exceptional cases, if none of the abovementioned legal basis is eligible, the processing is based on your consent pursuant to Art. 6(1)(a) (Art. 9(2)(a)) GDPR, e.g. if your application is kept on file.

Do we share your application data?

Within our company, only those persons and departments will have access to your personal data, who have a need to know regarding the decision of the conclusion of an employment relationship (e.g. the respective department in which you have applied). Should a legal dispute arise in the scope of the application procedure, the relevant personal data required for this purpose will be transmitted to legal representatives and authorities for appropriate legal prosecution. We may also transfer personal data to our data processors (e.g. IT-service-provider). We only collaborate with data processors who offer sufficient guarantees for secure data processing. Apart from that, we do not share your information with other recipients. Transfer of personal data to third countries is not planned.

Storage period:

The data which is required for processing your application or checking your suitability for an advertised position (employment/training relationship) will – in line with the applicable statutory regulations – be saved for a period of seven months after rejection of your application. If we would like to keep your application on file for a longer period (2 years), we will ask for your consent. A longer retention period is possible when this is necessary to meet our obligations, required by law or regulation or necessary to assert, maintain or defend legal claims.

Withdrawal of your consent:

You can withdraw your consent at any time with effect for the future by sending an e-mail to [datenschutz@autologg.com](mailto:datenschutz@autologg.com).

### 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 (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 or payment providers). 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 (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, 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.

#### 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);
- 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.

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](mailto:privacy@autologg.com).

#### 6. Miscellaneous

We may adjust this Privacy Policy if necessary. You will find the latest version here: [Privacy.](#)

April, 2024