

PRIVACY POLICY ACCORDING TO ARTICLES 13-14 OF EU REGULATION 2016/679 (GDPR)

Dear User,

This privacy policy will allow you to clearly and fully understand how your personal data are processed by Klaxon Mobility GmbH when you use our fleet management service.

1. WHO IS THE DATA CONTROLLER?

The data controller is **KLAXON MOBILITY GmbH**, with its legal headquarters at 9601 Arnoldstein (Austria), Industriestrasse.

For information about data processing, you can write to the following e-mail address: **info.klaxon@etac.com**.

2. WHAT PERSONAL DATA DO WE COLLECT AND PROCESS?

The following personal data may be processed when you use our fleet management service:

- **Automatically collected data necessary for the operation of our services:** we collect information automatically for the operation of our service such as IP address, browser type and version, the operating system used, referrer URL, browser string, host name of the accessing computer and time of the server request.
- **Authentication:** data necessary for registration and authentication to our services, and to access your fleet management dashboard, such as e-mail and password.
- **Additional personal data:** over time, we might process additional personal data and metadata that you might provide, or which could be automatically collected during the use of the fleet management services such as your phone number.

We use cookies, which are small text files sent from a web server to the user's browser and stored on the user's computer or other devices. You can find the updated list in the cookie policy.

3. FOR WHAT PURPOSES DO WE PROCESS PERSONAL DATA AND WHAT IS THE LEGAL BASIS?

Data will be acquired and processed to achieve the following purposes. The conditions of legality of data processing are indicated alongside.

a. **Registration to the fleet management service and authentication processes.** We process personal data related to users who wish to access and use our fleet management service. Legal basis: execution of a contract between the parties.

b. **Security and improvement of services.** Our fleet management service records a series of logs generated by user actions to ensure the security of our platform and of the authentication processes, including multi-factor authentication (if enabled). Legal basis: legitimate interest of Klaxon Mobility GmbH to improve the services offered and to ensure the security of the services.

c. **Judicial proceedings or requests from authorities.** We might process and / or transfer personal data and metadata (e.g. system logs) already in our possession (see letters a and b) when it's necessary to ascertain, exercise, or defend a right in judicial proceedings or when it's necessary to comply with formal requests from judicial authorities. Legal basis: legitimate interest of Klaxon Mobility GmbH in the exercise or defense of a right and duty to comply with the law.

4. NATURE OF DATA PROVISION

The provision of information requested for the purposes referred to in point 3, letter a) is necessary for the use of our fleet management service. Failure to provide the information required for registration (email and password) would prevent its use. Data collected for the purposes referred to in point 3, letter b) is acquired automatically.

5. HOW LONG DO WE STORE DATA?

Data needed for the registration and authentication procedures will be kept for the whole duration of the contract between parties. If the user does not complete the registration within this period, their data will be immediately deleted. Otherwise, if the registration is completed, the data will be kept until the user requests the deletion of their account or until the termination of our contract.

Data necessary for the operation of our services will be kept for 14 days and then deleted.

Some data, like security logs, may be kept for a longer period in compliance with specific legal obligations, contractual obligations, and/or to comply with formal requests from judicial authorities, and/or to exercise or defense of the rights of the Data Controller.

5. WHO MIGHT YOUR PERSONAL DATA BE DISCLOSED TO?

Personal data will be processed by appropriately trained personnel operating under the authority of the Data Controller. Some of the information may be communicated exclusively for the purposes specified above to the following entities:

- Companies providing technical assistance and maintenance of our IT systems, or providers of Infrastructure / Cloud computing and storage systems
- Other entities or companies that perform activities instrumental to the above purposes on behalf of the Controller

Klaxon Mobility GmbH is a wholly owned subsidiary of Etac AB. Therefore, certain data might be also available to Etac AB employees.

A detailed list of all recipients is available at the office of the Data Controller and will be provided upon request.

6. YOUR RIGHTS

General data protection law ("GDPR") provides a series of rights that can be exercised to maintain control of your data. To exercise your rights, you can write to info.klaxon@etac.com filling out and sending the appropriate forms provided by the Austrian Data Protection Authority (<https://www.dsb.gv.at/download-links/dokumente.html>) or by sending us a direct email.

We are required to respond to you within 30 days of receiving the request and will try to be as quick as possible!

Right of Access: You have the right to obtain information about the processing of personal data concerning you, access it, and also obtain a copy in common electronic means. We are committed to providing you a report of the data we hold, such as your personal details, contact data, or requests received via contact form or email.

Right of Rectification: You have the right to get your data updated, supplemented, or corrected. If you believe your data is incorrect or outdated, contact us – we will do our best to resolve the issue.

Right of Data Portability: If you wish, you can request the portability of your data processed under the execution of the contract or based on your consent.

Right of Erasure: If interested, you have the right to request the deletion of your data. We are committed to giving you control over your data. In some cases, you can ask us for direct deletion, and we will proceed as quickly as possible. However, please note that not all data can be deleted upon request as they may be necessary to fulfill legal obligations or are still in use.

Right to Restriction and Objection: You have the right to request a limitation on the processing or to object in whole or in part to the processing of personal data concerning you, even for marketing purposes. When you request a limitation of processing, we are required to suspend any further processing activity of your data for a set period. When you decide to object to processing, you can unilaterally decide to give up a certain type of processing of your data, such as deactivating analysis cookies.

If you believe that one or more processing activities carried out by us may be in violation of the regulations or believe that your rights have not been protected, you can file a complaint with the Supervisory Authority where you usually reside, work, or where the alleged violation occurred. In Austria, you can contact the Austrian Data Protection Authority.

7. UPDATES

The evolution of our services may involve changes to this notice, which may undergo modifications and integrations over time, which may also be necessary concerning new regulatory interventions in the field of personal data protection.

We therefore invite you to periodically check its contents.

Last updated: 28.05.2026

