

## PRIVACY POLICY

Connected-Load-Carrier (CLC) respects your privacy. Your (personal) data is therefore treated very carefully and is properly secured. CLC adheres to Dutch privacy legislation. In this privacy statement we further explain how we handle your (personal) data

### INTRODUCTION

When you use the CLC website / hardware / app / dashboard, your personal data will be processed. This includes your location data. We use this information to provide our services. Where necessary, we ask you for permission to use this data. It may be that these services – by their nature – require more personal data to be processed. We do everything we can to guarantee your privacy. For example, we will never provide your data to third parties, unless we are legally obliged to do so or with the approval of a third party processing agreement. The data is also well secured with us.

### WHO IS CLC?

CLC is a trade name of Non Powered Asset Control B.V.. We are located at Grasso- Space for digital minds, Parallelweg 27 Office KA 0.18 in 's-Hertogenbosch The Netherlands and registered in the trade register of the Chamber of Commerce under number 82337314.

### WHICH DATA DOES CLC PROCESS AND WHAT ARE THEY USED FOR?

When using the app, various information about you is registered and used further. CLC processes the following data as standard.

Technical information about your device. This concerns data such as one or more unique numbers that refer to your devices. If you give permission for this in the app, we also process the following data for all users:

- Location data. This concerns data about your exact location, direction, speed and the time of the measurement.

- Asset data. This concerns data about the properties of your asset. We need this information for, among other things, to be able to give you the correct route advice for example but not limited to a case of losing your asset.
- Environmental data. Bluetooth devices and wifi-networks, temperature, movement/shock, cell-towers, Gps-satellites. To provide our services of tracing your assets.
- Contact (personal) details: name, phone number, company / organization details, e-mail address and your password. Internet Protocol (IP) addresses and cookies.
- Working hours: The worked hours entered by the user, possibly supplemented by the activities.
- Usage data: data about your historical journeys, data about your use of additional services offered by us and settings and preferences made in the app. We need this information for the app to function properly and to provide our services.

### FOR WHAT PURPOSES ARE THESE DATA PROCESSED?

CLC uses this information for the following purposes:

- for the provision of our services: showing asset location, offering information about the trip your asset have traveled, environmental details about your asset, etc.;
- to be able to improve our own services, for example by looking at which (parts of) our products and services are or are not popular and which functionalities can still be improved;
- or statistics about the use of our products & services;
- to further secure our products and services against misuse;
- to comply with all legal obligations that apply to us;
- to settle any disputes;
- for saving settings that you make in the app, so that you can quickly restore them when switching to another device;
- to be able to contact you, for example to send you a reset password by e-mail. We use and disclose any of

the foregoing Personal Information to comply with applicable law, regulation, legal process, subpoena or governmental request, or to protect the rights or property of CLC or its Users, as needed.

### **WHAT IS THE LEGAL BASIS FOR THESE PROCESSING OPERATIONS?**

The processing of your data takes place on the following legal grounds: the consent you have given (e.g. the location data); the execution of the agreement with you; legal obligations (e.g. tax legislation); and our legitimate interests (e.g. developing new services or generating statistical data).

### **WHAT LEGITIMATE INTEREST DOES CLC HAVE?**

For the processing of personal data that goes beyond what is strictly necessary for the provision of our services, which are not based on a legal obligation, nor on your consent, CLC relies on the so-called “legitimate interest”. That legitimate interest lies in everything that is necessary for the normal management and continuity of our business operations. Of course, we take your privacy into account.

### **SECURITY OF THE DATA**

CLC will take appropriate technical and organizational measures to protect your personal data against loss or any form of unlawful processing.

We use commercially reasonable and appropriate measures to protect the security and integrity of Non-Personal data and Personal data we collect or maintain as a part of our Site. Please note, however, that there are inherent risks in transmission of information over the Internet, and we cannot guarantee that unauthorized access or use of information will never occur.

### **CHILDREN UNDER 13**

Our Site is not directed to or intended to be used by children under the age of 13 and we do not knowingly collect any Personal Information from children under 13. If you become aware that we have collected Personal Information from any child under the age 13, we ask that you contact us at [info@connected-load-carrier.com](mailto:info@connected-load-carrier.com) and we will seek to delete such Personal Information as soon as possible.

### **INTERNATIONAL DATA TRANSFER**

In the course of providing our Site services to you, we may transfer Personal Information about you across borders from the country in which you are located to other countries around the world, as permitted by applicable laws. Please note that we may transfer such information to a country that does not have the same privacy or data protection laws as your country. Accordingly, with respect to an international transfer, your Personal Information may be subject to different protections depending on the laws and regulations of the country to which your Personal Information is transferred. In all cases, we will seek to apply reasonable safeguards for the protection of any Personal Information transferred internationally.

### **CHANGES TO THIS PRIVACY POLICY**

We may change this Privacy Policy at any time without prior notice. Any updated Privacy Policy will include a date which indicates when the Privacy Policy was last revised. Please check back often to review the most current version of the Privacy Policy.

### **RETENTION PERIOD OF THE DATA**

CLC does not store personal data longer than legally necessary.

### **QUESTIONS?**

If you have any questions about the processing of (personal) data by CLC, please contact us using the details below: Non Powered Asset Control BV, Attn the Data Protection Officer, Grasso- Space for digital minds, Parallelweg 27 Office KA 0.18, 's-Hertogenbosch, The Netherlands. Or send an email to [info@connected-load-carrier.com](mailto:info@connected-load-carrier.com) with subject Privacy Agreement.