# Privacy Policy, effective date: December 10, 2018

### About the policy

When you use our services, you're trusting us with your information. We understand this is a big responsibility and work hard to protect your information and put you in control. This Privacy Policy is meant to help you understand what information we collect, why we collect it, and how you can update, manage, export, and delete your information. By using our website, you're agreeing to be bound by this Policy. Any questions regarding this Policy and our privacy practices should be sent by email to <u>office@el-watch.com</u>.

### Who we are

El-Watch is an innovative tech company developing and producing energy efficient electronics and wireless communication. We have developed and sold hi-tech solutions for the maritime, automotive, agriculture, buildings and power sector since 2002. We are located in Rindal and Trondheim, Norway.

The Neuron sensors are developed by EI-Watch in close cooperation with demanding customers in the maritime and automotive industries.

With the Neuron THS system you get remote monitoring of the truck and trailer's tire health at all time. Warning by e-mail and SMS if deflation occurs, not only when driving but also when truck and trailer are parked for short or longer periods. To achieve this in a good way, we need to collect some information about you and how to use the product and its applications

### Why we collect data

We collect several different types of information for various purposes to:

- To notify you about changes to our Service
- To provide and maintain the Service
- To provide customer care and support
- To provide analysis or valuable information so that we can improve the Service
- To monitor the usage of the Service
- To detect, prevent and address technical issues

# **Types of Data Collected**

Personal Data

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personally identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Phone number

- Birthday
- Address, State, Province, ZIP/Postal code, City
- Salutation
- Contact details (e.g. email address, phone number)
- Feedback from customers
- Photography of customer contact;
- User name/id;
- Log files
- IP adress
- Information about your vehicle
- Information about your vehicle's usage pattern
- Sensor data from the vehicle
- Cookies and Usage Data
- El-Watch maintains up to six months of data messages available as "live" data. In addition, we also archive older device generated data that can be retrieved offline

# Usage Data

We may also collect information that your browser sends whenever you visit our Service or when you access the Service by or through a mobile device ("Usage Data").

This Usage Data may include information such as your browser's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When you access the Service by or through a mobile device, this Usage Data may include information such as the type of mobile device you use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use, unique device identifiers and other diagnostic data.

### How we protect the information

The security of your data is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security. El-Watch uses general security standards but has not taken additional action to secure data provided to its sites, and such transmissions are subject to normal Internet security risks. As noted, no Internet or e-mail transmission is ever fully secure or error free. In particular, e-mail sent to or from this Site may not be secure, and you should therefore take special care in deciding what information you send to us.

# **Tracking & Cookies Data**

We use cookies and similar tracking technologies to track the activity on our Service and hold certain information.

Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track

information and to improve and analyze our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

### Service Providers and others who have access to your information

We may employ Volvo Trucks among others as a third party company to facilitate our Service, this to provide the Service on our behalf, to perform Service-related services or otherwise act on our behalf. Volvo Group will be able to access all of the data collected through use of this product and applications. These third parties have access to your Personal Data to on our behalf. The third party and are obligated not to disclose or use it for any other purpose. We do not sell, rent, trade, or otherwise transfer to outside parties your personal information. We may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganisation, or if we're under a duty to disclose or share your personal data in order to comply with any legal obligation or to enforce or apply our terms of use or to protect the rights, property or safety of our supporters and customers. The third parties (e.g. VOLVO) may use subprosessors for data processing among otherpossible assignments. All subprocessors must conform to the respective requirements of the Data Processing Agreement between El-Watch and Volvo Group. When El-Watch or a third party engaging subprocessors, the third party (e.g VOLVO) shall ensure that any rights El-Watch has against the third Party under their Data Processing Agreement on the commissioning of data are granted to El-Watch - via the third party - against the subprocessors as well. The third party shall at El-Watch's request disclose the identity of any and all subprocessors and the location of the data processing. If and to the extent the third party engages subprocessors, including that such subprocessors in their turn engage subprocessors, and such assistance entails the processing of personal data on behalf of El-Watch, El-Watch has granted the authority to enter into a written sub-processor agreement, data transfer agreement or other

agreement required by law for the processing of personal data, with any subprocessor, and allow each and all such subprocessors to enter into written subprocessor agreements, data transfer agreements or other agreements required by law for the processing of personal data, with subsequent subprocessors. Volvo have been authorized to collect and process the following types of personal data:

- (a) Name;
- (b) Address;
- (c) Organisation identification number (company registration number);
- (d) Birthdate;
- (e) Salutation;
- (f) Contact details (e.g. email address, phone number);
- (g) Feedback from customers;
- (h) Photography of customer contact;

- (i) User name/id;
- (j) Log files; and
- (k) Vehicle data.

The above specified types of personal data relate to the following categories of data subjects:

- (a) Customers of El-Watch;
- (b) Representatives of the customers of El-Watch, including but not limited to the customers' employees, contractors and advisers; and
- (c) Representatives of El-Watch, including but not limited to El-Watch's employees, contractors and advisers.

However, we will take steps with the aim of ensuring that your privacy rights continue to be protected and El-Watch takes full responsibility for the integrity of the personal data, including the accuracy of the data and that such data do not infringe any third party rights or in any other way violate applicable law including the GDPR.

# **Links To Other Sites**

Our Service may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

### **Transfer Of Data**

Your information, including Personal Data, may be transferred to — and maintained on computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside Norway and choose to provide information to us, please note that we transfer the data, including Personal Data, to Norway among other countries and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

El-Watch will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

### **Children's Privacy**

Our Service does not address anyone under the age of 18 ("Children").We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your Children has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

# Breaches

We will take the following responsive action, should a breach of our obligations according to this Privacy Policy occur: We will notify the users via in-site notification; and We will notify the competent supervisory authority according to deadlines implied by applicable law.

# **Changes To This Privacy Policy**

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

# Your rights

You can enforce your rights by sending an email to mailbox@datatilsynet.no or by contacting our privacy representative. You are entitled to a response without undue delay and no later than 30 days.

Access to own information: You can request a copy of all the information we process about you.

Correction of personal data: You may ask us to correct or supplement information that is incorrect or misleading.

Deletion of personal data: In certain situations, you can ask us plain information about yourself.

Limitation of processing of personal data: In some situations, you may also ask us to limit the processing of information about you.

You also have the right to object to our processing of information about you. If this is the case, please conta**C**t us for assistance.

# How to contact us

If you have questions about the Privacy Policy, pleas contact us:

- By email: office@el-watch.com
- By visiting this page on our website: www.el-watch.com
- By phone number: +47 71 66 69 08