

Appendix – Description of the processing of personal data in the Services

This appendix shall be considered an integral part of the Data Processing Agreement.

1. PURPOSE OF PROCESSING

Personal data is processed for the following purposes:

- To provide the Software and support for the Software; and
- To fulfill any additional documented instructions provided by the Customer from time to time.

2. LOCATIONS WHERE PERSONAL DATA WILL BE PROCESSED

Personal data is processed by the Supplier. For information about the Sub-processors engaged by the Supplier and where they process Customer's personal data, refer to the website indicated by the Supplier from time to time.

3. RETENTION OF PERSONAL DATA

If the Agreement is terminated, data will be retained until the Supplier has returned or deleted the Customer's personal data in accordance with the provisions of the Data Processing Agreement. Also, refer to point 4 below for more information for what period personal data is retained in the Software.

4. DETAILED DESCRIPTION OF PERSONAL DATA PROCESSING IN THE SOFTWARE

See below for a detailed description of the processing of personal data that occurs in the Software.

A. INFOBRIC FLEET

Subservice/Purpose	Example of Processing	Categories of Data Subjects	Categories of Personal Data	Retention Period
Manage Vehicle Fleet	<ul style="list-style-type: none"> Collection of position data from vehicles and transfer to the Software Storage of position data from vehicles in the Software Generation of reports and statistics 	<ul style="list-style-type: none"> Customer's employees and other personnel hired or otherwise engaged by the Customer External individuals (using the Customer's vehicles) 	<ul style="list-style-type: none"> Identity data (e.g., name, user ID, ID card information) Contact information (e.g., email address) Position data (e.g., recorded geographic position) Vehicle information (e.g., registration number) 	Position data is retained for 12 months from the registration date and is accessible to the Customer for 3 months from registration. Compiled trips based on position data are stored for 8 years from the registration date. Other personal data is stored as long as the Customer uses the Software. Accessibility to position data can be extended upon the Customer's request.
Driving Journal and Congestion Tax Management	<ul style="list-style-type: none"> Collection of position data from vehicles and transfer to the Software Storage of position data from vehicles in the Software Compilation of position data for history and driving journal Generation of reports and statistics 	<ul style="list-style-type: none"> Customer's employees and other personnel hired or otherwise engaged by the Customer 	<ul style="list-style-type: none"> Identity data (e.g., name, user ID, ID card information) Contact information (e.g., email address) Position data (e.g., recorded geographic position) Vehicle information (e.g., registration number) 	Position data is retained for 12 months from the registration date and is accessible to the Customer for 3 months from registration. Compiled trips based on position data are stored for 8 years from the registration date. Other personal data is stored as long as the Customer uses the Software. Accessibility to position data can be extended upon the Customer's request.
Transport Management	<ul style="list-style-type: none"> Collection of position data and vehicle data from vehicles and transfer to the Software Storage of position data from vehicles in the Software Generation of reports and statistics 	<ul style="list-style-type: none"> Customer's employees and other personnel hired or otherwise engaged by the Customer External individuals (using the Customer's vehicles) 	<ul style="list-style-type: none"> Identity data (e.g., name, user ID, ID card information) Contact information (e.g., email address) Position data (e.g., recorded geographic position) Vehicle information (e.g., registration number) 	Position data is retained for 12 months from the registration date and is accessible to the Customer for 3 months from registration. Compiled trips based on position data are stored for 8 years from the registration date. Other personal data is stored as long as the Customer uses the Software. Accessibility to position data can be extended upon the Customer's request.

User Administration	<ul style="list-style-type: none"> Collection through user account registration 	<ul style="list-style-type: none"> Customer's employees and other personnel hired or otherwise engaged by the Customer External individuals (using the Customer's vehicles) 	<ul style="list-style-type: none"> Identity data (e.g., name, user ID, ID card information) Contact information (e.g., email address) Organizational information (e.g., title) 	Personal data is retained as long as the Customer uses the Software.
Handle Inquiries and Support	<ul style="list-style-type: none"> Communication related to inquiries or support Error handling and troubleshooting 	<ul style="list-style-type: none"> Customer's employees and other personnel hired or otherwise engaged by the Customer External individuals (using the Customer's vehicles) 	<ul style="list-style-type: none"> Identity data (e.g., name, user ID, ID card information) Contact information (e.g., email address) Organizational information (e.g., title) Communication (e.g., message content) 	Personal data is retained as long as the Customer uses the Software.
Develop and Improve Services	<ul style="list-style-type: none"> Storage of data in a test environment Use of data for testing 	<ul style="list-style-type: none"> Customer's employees and other personnel hired or otherwise engaged by the Customer External individuals (using the Customer's vehicles) 	<ul style="list-style-type: none"> Identity data (e.g., name, user ID, ID card information) Contact information (e.g., email address) Position data (e.g., recorded geographic position) Vehicle information (e.g., registration number) 	Personal data is retained for the time necessary to anonymize the data, test functionality, and verify corrections.
Technical Functionality and Security	<ul style="list-style-type: none"> Backup Troubleshooting Incident management 	<ul style="list-style-type: none"> All categories of data subjects mentioned above. 	<ul style="list-style-type: none"> All categories of personal data mentioned above Technical data (e.g., IP address) 	Personal data is retained for the same period as specified in relation to each above-mentioned purpose of the data processing. Personal data in logs is retained for troubleshooting for a 12 months from the time of the log event. Data in backups is retained for 4 months from the date of the backup.

B. INFOBRIC EQUIPMENT

Sub-service/Purpose	Example of Processing	Categories of Data Subjects	Categories of Personal Data	Retention of personal data
Manage equipment (machines, products and tools)	<ul style="list-style-type: none"> Register responsible person for equipment Sharing of data with lessors (where applicable) 	<ul style="list-style-type: none"> Employees of the Customer Consultants, partners or otherwise employed by the Customer Users 	<ul style="list-style-type: none"> Identity Data Organisation data Location data (with the consent of the data subject in the entity concerned) 	Personal data is retained, as a starting point, during the construction project or until another responsible person is registered for the equipment in question, unless the Customer instructs otherwise in writing.
Follow up and evaluate the use of the equipment	<ul style="list-style-type: none"> Compilation of recorded data at aggregated level Production of reports 	<ul style="list-style-type: none"> Employees of the Customer Consultants, partners or otherwise employed by the Customer Users 	<ul style="list-style-type: none"> Identity data Organisation data Location data (with the consent of the data subject in the entity concerned) 	Personal data is retained, as a starting point, during the construction project or until another responsible person is registered for the equipment in question, unless the Customer instructs otherwise in writing. Reports at an overall level and statistics that do not contain any personal data are retained during the time that the Customer uses the Service.
Follow up and evaluate the use of the Service	<ul style="list-style-type: none"> Registration of activity 	<ul style="list-style-type: none"> Users 	<ul style="list-style-type: none"> Identity data Technical data 	Personal data is retained for this purpose for as long as your user account is active. The user account is active if login has occurred within the last 18 months.
Managing the Services	<ul style="list-style-type: none"> User account registration Permissions/access registration 	<ul style="list-style-type: none"> Users 	<ul style="list-style-type: none"> Identity Contact details Technical information 	Personal data is retained for this purpose for as long as your user account is active. The user account is active if login has occurred within the last 18 months.
Managing customer support	<ul style="list-style-type: none"> Communication in support channels Managing technical flaws 	<ul style="list-style-type: none"> Employees of the Customer Consultants, partners or otherwise employed by the Customer 	<ul style="list-style-type: none"> Identity Contact details Organisational information Technical information 	Personal data is retained for this purpose for as long as your user account is active. Personal

		<ul style="list-style-type: none"> • Users 		data in logs is retained in order to fulfil our legitimate interest of troubleshooting and incident management for a period of 18 months from the log entry time.
Developing and improving the Service	<ul style="list-style-type: none"> • Storing information in test environments • Using user data to conduct tests • Anonymising user data 	<ul style="list-style-type: none"> • Employees of the Customer • Consultants, partners or otherwise employed by the Customer 	<ul style="list-style-type: none"> • Technical information 	Personal data is retained for the period necessary to anonymize the information, test the functionality and verifying corrections.
Ensuring necessary technical functionality and security	<ul style="list-style-type: none"> • Back-ups • Analysis • Incident management 	All the categories above	All the categories above	<p>Personal data is retained during the time that the Customer uses the Service.</p> <p>Personal data in logs is retained for troubleshooting and incident management for a period of 12 months from the time of the log event.</p> <p>Data in backup copies are retained for a period of 12 months from the date of backup.</p>

The table below provides detailed information on the categories of personal data processed by the Supplier as described above.

Categories of personal data	Example on category of data
Identity data	Name
Contact details	Email address
Communication	Content in messages
Location data	GPS position for equipment
Organisation data	Title, employer

Technical data	IP-address, User-ID, version of web reader and operation system
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5. ENGAGED SUB-PROCESSORS

The following sub-processors are engaged by the Supplier to provide the Services at the time of the Agreement's conclusion.

Infobric Fleet

Identity	Processing Location	Service
<i>Amazon Web Services</i> 410 Terry Avenue North, Seattle, WA 98109-5210, United States	Ireland and Sweden	Infrastructure service
<i>Google Workspace</i> 650 Page Mill RD, Palo Alto CA 94304, Unites States	EU	Document storage
<i>Microsoft</i> 1 Microsoft Way, Redmond, WA 98052-8300	EU	Email and Documenta storage
<i>Intercom R&D Unlimited Company</i> Stephen Court, 18-21 St. Stephen's Green, Dublin 2, Republic of Ireland	Ireland	Support management and communication

Infobric Equipment

Identitet	Processing Location	Service
<i>Amazon Web Services</i> 410 Terry Avenue North, Seattle, WA 98109-5210, United States	Sweden and Germany	Infrastructure service
<i>Twilio Inc.</i> 101 Spear Street, Fifth Floor, United States	Germany and Ireland	Communication- and security services
<i>Microsoft</i> 1 Microsoft Way, Redmond, WA 98052-8300	EU	Email and document storage
<i>Intercom R&D Unlimited Company</i> Stephen Court, 18-21 St. Stephen's Green, Dublin 2, Republic of Ireland	Ireland	Support management and communication