## **Privacy policy**

Realcom respects the privacy of its users and is fully committed to protecting their personal data. This Privacy Policy explains how Realcom ("Realcom", "we", "us", "our") processes information about individuals, including personal data, in relation to the use of the Realcom website and the fleet management solution ("Service"). Here you will find detailed information about what type of information we collect and why, what we do with it, and what are your rights.

The controller of your personal data is the Realcom group entity to which your personal data has been submitted on the basis of a contractual or pre-contractual relationship, or whose Services you use or intend to use. You can see our contacts in the <u>Contact information</u> section.

By accessing or using this website or any of our Services, you agree to the terms set out in this Privacy Policy, <u>Cookie Policy</u> and other terms and policies published on our website. If you do not agree to this Privacy Policy, you must leave this website and discontinue all use of any of our Services.

1. Information we process  $\checkmark$ 

1. 1. Realcom collects, generates and receives information in a variety of ways when you use the Service, place an order or visit our website. Some of this information constitutes personal data.

1.2. When you set up an account with Realcom or place an order, you provide us with the following information, containing your personal data:

1.2.1. full name;

1.2.2. e-mail address;

1.2.3. payment information;

1.2.4. phone number;

1.2.5. shipping/billing address;

1.2.6. any other information, which you provide for this purpose.

1.3. Some information may be processed while you use our Service. Depending on the scope and configuration of Realcom Service, this information may also contain your personal data:

1.3.1. your vehicle data (for example, make, type and brand of the vehicle, mileage, technical information, etc.);

1.3.2. driver's data (location, routes, driving habits, speed, direction, etc.);

1.3.3. digital tachograph and driver's data and activities (for example, driver's license number, name, time spent on breaks, start, stop and end time of driving, driving duration, tachograph calibration, tachograph manufacturer, information on tachograph control, absence calendar, etc.);

1.3.4. web browser data (for example, IP address, browser type, version, etc.);

1.3.5. other data, which we can receive during the use of our Service and which, in connection with other information, may contain personal data (for example, temperature data, fuel sensor data, etc.).

1.4. Upon configuring your Realcom account settings, you may provide us some information that may contain personal data:

1.4.1. Driver's data (for example, name, e-mail address, phone number, birth date, driver's license number, digital tachograph card number and other data, which you have provided);

1.4.2. vehicle fleet data, according to your use and configuration of Realcom Service;

1.4.3. communication history with you;

1.4.4. other information, which may contain your personal data (for example, location, time zone, photo etc.).

1.5. You can choose to integrate third-party services in relation to certain aspects of Realcom Service. A third-party service is a software that integrates with the Service and you can enable or disable such integration for your Realcom account. Once enabled, the relevant third -party service provider may share or receive certain information (including importing or exporting). You should check the privacy settings of these third-party services to understand what data may be disclosed to us.

1.6. Upon visiting our website, we may collect and process the following information that may contain your personal data:

1.6.1. your device and browser;

1.6.2. your IP address;

1.6.3. other information that is collected from cookies and similar technology we use. Learn more about how we use cookies on our website by reading our <u>Cookie Policy</u>.

2. Purposes of processing  $\checkmark$ 

2.1. Realcom will process your personal data in order to provide you with the Service, improve it, solve any Service related issues you may have and ensure that you receive the best customer experience possible.

2.2. Realcom collects and processes your personal data for the following purposes:

- to register you for the use of the Service, verify your identity and create your Realcom
- account; to send you invoices and process payments for the Service;
- to personalize your use of the Service when you set up your account
- settings; to analyze your preference or use of the Service;
- to communicate with you to inform you about Realcom Service and provide you any Service related support, answer your questions and process your requests;
- to improve Service or to develop new features within the Service;
- to analyze and measure how our Service is used. For example, we analyze data about your usage of the Service to optimize product design, to generate reports and create statistics;
- to deliver personalized ads, promotions and offers to you;
- to protect legal interests of Realcom, its users and other third parties and for legal reasons such as, e.g. enforcing our Terms & Conditions, agreements or policies, complying with any applicable law and assisting law enforcement authorities.

## 3. Legal grounds for processing $\checkmark$

3.1. Realcom only collects and processes your personal data where we have lawful basis. Legal grounds for the processing of your personal data vary depending on the specific group of data and the purposes for processing it. Note that we may be processing the same personal data for several purposes simultaneously and, respectively, on more than one legal ground.

3.1.1. Contract. Most of the time the legal basis for processing your personal data is the contractual relationship between you as the user of Service and Realcom, since we need certain information to conclude the contract and fulfil our obligations arising out of this contract.

3.1.2. Legal obligation. In some cases, Realcom processes personal data on basis of legal obligations, imposed on us by applicable law, such as financial and tax reporting obligations, or if we have to respond to legal process.

3.1.3. Legitimate interests. Processing of your personal data is necessary for pursuing legitimate interests of Realcom or the legitimate interests of third parties, always ensuring that such processing shall not outweigh your rights and freedoms. For example, we may process your data for marketing purposes based on our legitimate interest of developing and improving our business. Other legitimate interests include maintaining Service to meet the needs of our users and clients, advertising to make our Service freely available for users, detecting and preventing fraud, abuse, security and technical issues with the Service, fulfilling obligations to our partners, enforcing legal claims, etc.

3.1.4. Consent. When you subscribe to our blog or newsletter, we will send you information, for example, our news, promotions or offers, based on your consent. Note that you have the right to withdraw your consent at any time and unsubscribe by using the unsubscribe link provided in the e-mail or by contacting us.

4. Retention period  $\checkmark$ 

Realcom will process your personal data for as long as any of the above-mentioned legal basis for data processing exist. At the end of this period, Realcom will delete your data.

5. Sharing your personal data with third parties  $\checkmark$ 

5.1. For Realcom to be able to provide you with our Service, we work with third parties that provide us with different services we need in ordinary course of our business. The categories of third party recipients (processors) of personal data include hosting and server co-location service providers, communication and content delivery networks, data and cyber security service providers, billing and payment processing service providers, fraud detection and prevention service providers, web analytics, email distribution and monitoring service providers, session recording service, advertising and marketing service providers, IT, legal and financial advisors, among others ("**Third-Party Service Providers**").

5.2. Third-Party Service Providers only receive the minimum amount of personal data as necessary for them to provide us the requested service. Realcom shares personal data only with such Third-Party Service Providers that have undertaken to comply with obligations set out in this Privacy Policy and applicable data protection laws.

5.3. In certain situations, we might have a legal obligation to share your information with third parties, if it is required by law or when information is requested by public authorities.

5.4. Personal data processed by Realcom may be transferred to Third-Party Service Providers that are located outside of European Union. In such cases Realcom will only share personal data with such recipients that have undertaken to comply with the necessary data protection requirements and that are able to ensure an adequate level of protection or have provided adequate guarantees.

## 6. Your rights 🗸

6.1. You have the right to request access to your personal data and to correct, amend, delete, transfer, or limit the use of your personal data by logging into your Realcom account or by reaching us using the contact information provided below. Before providing information, we may be required to verify your identity, thus we may require additional information.

6.2. If you believe that we have processed your personal data unlawfully, you have the right to submit a complaint to the contact information provided below, or to the respective data protection supervisory authority.

6.3. Provision of personal data is a requirement necessary to receive the Service and to enter into a contract with Realcom.

7. Privacy policy changes V

7. 1. Realcom may occasionally amend this Privacy Policy, for example, in cases when we introduce new services or new features. The amendments to this Privacy Policy enter into force and are applied from the moment they have been uploaded to this page.

7.2. Therefore, we encourage you to check this page from time to time. By continuing to use our Services or otherwise providing personal data to

us, after the amendments to this policy have been implemented, you agree to the updated terms of Privacy Policy.

8. Contact information

If you have any questions about your personal data or this Privacy Policy, or if you would like to file a complaint about how we process your personal data, please contact us by using the contact details below:

Realcom

## info@realcom.lv

Address: 18. novembra str., No. 97, Daugavpils LV-5417, Latvia

This Privacy Policy is effective as of 21 May 2021.