

Privacy Policy of the Coiote IoT Device Management Platform

By using the Platform Services provided by AVSystem sp. z o.o. (AVSystem, we), you acknowledge terms of processing information including personal data set out in this Privacy Policy. You also agree that AVSystem may process your data in accordance with the following Privacy Policy. We respect the privacy of the Users of our Platform and Services and are committed to protect the personal information that you share with us. We believe that your privacy is very important. This Privacy Policy is effective as of January 1, 2021.

IF YOU DISAGREE TO ANY TERM PROVIDED HEREIN, PLEASE DO NOT ACCESS AND USE THE PLATFORM.

In any matters relating to the processing of your personal data please write to us at the below address: AVSystem sp. z o.o., headquartered in Krakow, Radzikowskiego 47D Street, 31-315 Kraków, entered to the Register of Entrepreneurs of the National Court Register kept by the District Court for Kraków-Śródmieście in Krakow, XI Commercial Division of the National Court Register, under no. 0000999781, e-mail: support-iot@avsystem.com.

Please be informed that AVSystem - as a Polish company - is bound by Polish law and the regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (“**GDPR**”) even when we process personal data of data subjects permanently residing outside of the Republic of Poland.

Under this Privacy Policy, and unless we have entered into a different arrangement with you, AVSystem is the controller of personal data you provide to us within the meaning of Article 4 subparagraph (7) of Regulation 2016/679, i.e., the entity which, alone or jointly with others, determines the purposes and means of the processing of personal data. under the GDPR is called the “controller” of the personal data.

Information on the processing of personal data of customers (natural persons)

I. The purposes of processing your personal data and the legal basis for processing

We will process your personal data to:

- Conclude a sales / service contract with you and fulfill its terms. The legal basis for processing is the conclusion of the contract.
- Conduct direct marketing of our products and services, including providing you with information about our commercial offer and our activities. As part of marketing activities, we perform profiling, i.e. assess your interests and needs in the area of our products and services. Profiling is done to match our offer with your interests and needs, and to provide you with information and offers that may be of interest to you. Profiling is carried out on the basis of information on the type and scale of your

business activity and previous contracts that you have concluded with us. The legal basis for data processing is our legitimate interest in conducting marketing activities and increasing sales.

- Invite you to participate in our conferences, trainings, loyalty programs, provide other information about the company's operations and possible forms of cooperation. The legal basis for data processing is our legitimate interest in maintaining business relationships with our clients.

- Conduct satisfaction surveys, prepare analyzes of sales and use of our services, collect your opinions about our goods and services - in order to improve our goods and services. The legal basis for data processing is our legitimate interest in providing high quality goods and services.

- Fulfill obligations related to paying taxes, including keeping and storing tax books and documents related to keeping tax books, and storing accounting documents. The legal basis for data processing are legal obligations arising from tax regulations (Tax Code, the Act on tax on goods and services, the Corporate Income Tax Act) and accounting regulations (the Accounting Act).

- Defend AVSystem against any claims related to the contract - if a dispute arises over the contract. The legal basis for data processing is our legitimate interest in being able to defend against claims or assert claims.

II. Period of storage of your personal data

We will process your personal data during the performance of the contract you have concluded with us, as well as for the period of limitation of claims arising from the contract.

We will keep your personal data contained in tax or accounting documentation until the data storage obligations resulting from tax and accounting regulations expire.

To the extent that your data is processed on the basis of a legitimate interest, the termination of processing will take place after an effective objection.

III. Recipients of your personal data

We may transfer your personal data to:

- Public administration bodies, including the National Tax Administration, in the performance of their legal obligations;

- Our suppliers to whom we will entrust services related to the processing of personal data, e.g. IT services, transport services. Such entities process data on the basis of a contract with us and only in accordance with our instructions.

IV. Necessity to provide data

You must provide us with your personal data so that we can conclude and perform the contract with you - it is not possible to enter into and perform the contract without providing data.

V. Transfer of data outside the European Economic Area

We do not plan to transfer personal data to countries outside the European Economic Area, however in case it's necessary your personal data will only be transferred to entities outside the EEA that provide the appropriate level of personal data protection required in the European Union (EU).

VI. Information on your rights related to the processing of personal data (below)

Information on the processing of contact persons (e.g. employees or associates) of our customers

I. The purposes of processing your personal data and the legal basis for processing We will process your personal data because you are the contact person for us at our contractor or potential contractor.

Accordingly, we will process your data to:

- Contact you on current business matters, including the performance of contracts between us and your employer / entity you represent, making offers, placing orders, answering questions. The legal basis for data processing is our legitimate interest in the possibility of ongoing contact with our contractors (i.e. their employees / colleagues) in business matters.
- Conduct direct marketing of our goods and services, including providing you - as an employee of our client - with information about our commercial offer and our activities. The legal basis for data processing is our legitimate interest in the possibility of marketing and increasing sales.
- Invite you to participate in our conferences, trainings, loyalty programs, provide other information about the company's operations and possible forms of cooperation. The legal basis for data processing is our legitimate interest in maintaining business relationships with our contractors' employees and associates.
- Defend AVSystem against any claims or make any claims related to the contract with the entity in which you work or who you represent, i.e. our client - if a dispute arises regarding the contract. The legal basis for data processing is our legitimate interest in being able to defend against claims or assert claims.

II. Data source

We have received your data directly from you or from your employer / entity you represent.

We receive data from your employer / entity that you represent, such as your name, business phone number and email address, place of work, position or information about what type of matters you deal with.

III. Period of storage of your personal data

We will process your personal data during the performance of the contract you have concluded with us, as well as for the period of limitation of claims arising from the contract.

We will keep your personal data contained in tax or accounting documentation until the data storage obligations resulting from tax and accounting regulations expire.

To the extent that your data is processed on the basis of a legitimate interest, the termination of processing will take place after an effective objection.

IV. Recipients of your personal data

We may transfer your personal data to:

- Public administration bodies, including the National Tax Administration, in the performance of their legal obligations;
- Our suppliers to whom we will entrust services related to the processing of personal data, e.g. IT services, transport services. Such entities process data on the basis of a contract with us and only in accordance with our instructions.

V. Necessity to provide data

You must provide us with your personal data so that we can conclude and perform the contract with your employer/subject you represent - it is not possible to enter into and perform the contract without providing data.

VI. Transfer of data outside the European Economic Area

We do not plan to transfer personal data to countries outside the European Economic Area, however in case of it's necessary your personal data will only be transferred to entities outside the EEA that provide the appropriate level of personal data protection required in the European Union (EU).

VII. Information on your rights related to the processing of personal data (below)

Information on the processing of personal data for advertising and market research purposes

I. The purposes of processing your personal data and the legal basis for processing

We will process your personal data to:

- Conduct direct marketing of our products and services, including providing you with information about our commercial offer and our activities. As part of marketing activities, we perform profiling, i.e. assess your interests and needs in the area of our products and services. Profiling is done to match our offer to your interests and needs and to provide you with information and offers that may be of interest to you. Profiling is carried out on the basis of information on the type and scale of your business activity and previous contracts that you have concluded with us. The legal basis for data processing is your consent to conducting marketing activities and increasing sales.
- Invite you to participate in our conferences, trainings, loyalty programs, provide other information about the company's operations and possible forms of cooperation. The legal basis for data processing is your consent to conducting marketing activities and increasing sales.

II. Period of storage of your personal data

We will process your personal data until you withdraw your consent to processing personal data for advertising and market research purposes.

If you withdraw your consent, we will no longer process your personal data for the above purposes.

III. Recipients of your personal data

We may transfer your personal data to our suppliers to whom we will entrust services related to the processing of personal data, e.g. IT services, transport services. Such entities process data on the basis of a contract with us and only in accordance with our instructions.

IV. Necessity to provide data

Providing your data for advertising and market research purposes is voluntary.

V. Transfer of data outside the European Economic Area

We do not plan to transfer personal data to countries outside the European Economic Area, however in case of it's necessary your personal data will only be transferred to entities outside the EEA that provide the appropriate level of personal data protection required in the European Union (EU).

VI. Information on your rights related to the processing of personal data (below)

Information on your rights related to the processing of personal data

You have the following rights related to the processing of personal data:

- a. the right to object to the processing of your data for marketing purposes,
- b. the right to object to the processing of your data due to a special situation,
- c. the right to access your personal data,
- d. the right to request the rectification of your personal data,
- e. the right to request the deletion of your personal data,
- f. the right to request the restriction of the processing of your personal data,
- g. the right to transfer your personal data, i.e. the right to receive your personal data from us in a structured, commonly used, machine-readable IT format. You can send this data to another data administrator or request that we send your data to another administrator. However, we will only do this if this message is technically possible. You only have the right to transfer data to the extent that we process your data on the basis of a contract and in an automated manner.

To exercise the above rights, please contact us or our data protection officer (contact details above).

Right to object

To the extent that your data is processed on the basis of our legitimate interest - you have the right to object to the processing of data due to your special situation.

As we process your data for marketing purposes on the basis of our legitimate interest - you have the right to object unconditionally to the processing of your data for this purpose. You can also submit your objection to the processing of data for marketing purposes at any time via the link attached to each email.

Right to withdraw your consent on processing personal data

To the extent your personal data is processed on the basis of your consent you can withdraw it at any time without justification. Withdrawal of your consent to access to data is only effective for the future. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

The right to lodge a complaint to the competent authority

You also have the right to lodge a complaint to the supervisory body dealing with the protection of personal data, i.e. the President of the Office for Personal Data Protection.

Information on the processing of information in course of using cookies

Our Platform may use cookies to track how and when users visit the Platform. Cookies make web surfing easier by saving your passwords and other preferences for you. You can decline to permit cookies in your browser, but in that case we cannot promise you that all Platform features will function properly as a result.

I. Cookies

Cookies are small text files that are placed on your device (e.g., computer) by websites that you visit. Cookies usually contain the name of the website they come from, the time they are stored on the device and a unique number.

According to the law, we may store cookies on your device if they are strictly necessary for the use of the Platform. We require your consent for all other types of cookies.

The Platform uses so called “own cookies” (own cookies are those sent to the user's equipment from equipment or a domain managed by us) **and so called “third-party cookies”** (Third-party cookies are those sent to the user's equipment from equipment or a domain that is not managed by us, but by another entity that handles the data obtained through the cookies). If the cookies are installed from equipment or a domain managed by us, but the information collected through them is managed by a third party, they cannot be considered to be the our's cookies.

For more information about cookies, please visit www.aboutcookies.org (in English) or <http://wszystkooociasteczkach.pl> (in Polish).

Cookies identify the user's browser and improve the operation of the Platform. Cookies can make the use of the Platform easier, for example by saving the user's preferences when he returns to the page. We do not use cookies to obtain personal information from the user's device that have not been sent in a cookie file.

We use the following types of cookies:

- **necessary cookies** (used for technical purposes, including enabling the use of Platform),
- **functional cookies** (related to improving the functionality of the Platform),

- **statistical cookies** (used for statistical and analytical purposes; they help us to measure the Platform traffic and understand how visitors use our Platform),
- **marketing and social media cookies** (used for track visitors and marketing purposes and personalization of advertising and links to social media sites. These cookies are used to optimize the ads displayed to the user, e.g. determining where the user has been redirected to the Platform).

We analyze collected data using the external suppliers' solutions (third party cookies). Such cookies are used to identify unique user visits to the Platform and to analyze non-standard variables related to the use of Platform. The information collected in the above manner is anonymous and does not serve to identify specific users.

Can I opt out of accepting cookies or disable cookies?

Storing cookies and accessing them requires the consent of the user. **You can give this consent by using your web browser settings.**

Setting up the browser in a way that allows cookies to be used by the Platform means that you agree to the use of cookies. We would like to point out that blocking the "own cookies" may prevent proper functioning of the Platform.

Activities related to storing and sending cookies are handled by web browsers and invisible to the user. Most of browsers accept "cookies" by default. You can set your browser to reject requests to store all cookies or selected cookies. Before you decide to change the default settings, please remember that many cookies facilitate usage of the Platform. Disabling cookies can affect how our Platform performs in your browser.

If you do not want cookies to be stored on your end device, you can change your browser settings in particular, so that all or part of the cookies will be blocked.

Please remember, that if you block all cookies used by us, it can have a negative impact on the full and convenient use of the Platform. You will also prevent us from collecting anonymous information about the use of our Platform in order to constantly improve its services and content.

These settings can be changed at any time, e.g., in such a way as to block automatic acceptance of cookies. You can also delete cookies from your end device. To do this, use the instructions for the browser you are using.

To find information related to your browser, visit the browser developer's website.

II. Processing of personal data

1) Personal data and purposes of processing

When you use the Platform, cookies are also used. Cookies can sometimes directly or indirectly identify a specific user, so cookies may contain a personal data. **The rules regarding cookies are described in the section on cookies (above).**

With your consent on cookies, personal data (contained in cookies) can be processed for marketing purposes, including profiling, and can be collected and disclosed by transmission to cooperating trusted entities whose technologies we use.

We also inform you that your personal data can also be processed for the following purposes:

- to provide services by us;
- to detect bots and fraud;
- to measure statistics and improve our services;
- for possible defense against claims;
- to comply with legal requirements, if the obligation to store data results from legal provisions.

Unless otherwise indicated, the controller of the Platform user's personal data is the Service Provider.

2) Retention period of personal data

The retention period of your personal data depends on the purpose for which this processing is carried out.

Personal data used for marketing and analytical purposes or collected and shared to cooperating trusted entities whose technologies we use, are processed until your objection for such processing.

In relations to the services we provide, your data will be processed for the period in which these services are provided and sometimes after their termination, but only if it is permitted or required by applicable law, e.g. processing for defenses against claims. In this case, the data will be processed only for the period necessary to achieve such purposes.

In relations to detecting bots and frauds your data will be processed for these purposes until your objection or until you finish using the services we provide.

3) Legal basis for processing of personal data

The processing of your personal data is based on several grounds:

- a) to **provide the service** that you request, your data will be processed on the basis of art. 6 (1) (b) GDPR (processing is necessary for the performance of a contract to which the data subject is party);
- b) for the **marketing of purposes, including profiling and retargeting, and for the collection and sharing data with trusted entities cooperating with us that can process data for their own purposes as well as analytical purposes and to improve the quality of our services**, your data will be processed on the basis of art. 6 (1) (f) GDPR (legitimate interests of the controller or a third party). Our (or third party's) legitimate interest is the ability to making marketing activities to increase sales of product and services, and also preparing analyzes and statistics;
- c) **in order to detect bots and fraud or possible defense against claims**, your data will be processed on the basis of art. 6 (1) (f) GDPR (legitimate interests of the controller). Our legitimate interest is to ensure the security of our services, as well as their constant improvement and the ability to defend against claims;
- d) the basis for data processing may also be legal provisions if they oblige us to store specific data (art. 6 (1) (c) GDPR).

4) Voluntary provision of personal data

Providing your data is voluntary, but necessary to perform the services we provide. If this data is not provided, the service cannot be provided.

Providing your data for the other purposes is voluntary.

5) Your rights

You have the following rights related to the processing of personal data:

- the right the **right to object to the processing of your personal data for marketing purposes, which includes profiling** to the extent that it is related to direct marketing;
- **to object to the processing of your personal data based on our legitimate interest** due to your particular situation;
- the **right to access** your personal data;
- the **right to erasure** of your personal data;
- the **right to demand restriction** of the processing of your personal data;

To the extent that your data is processed in connection with the service provided (data that is necessary to provide the service), you can additionally exercise the right to portability personal data, i.e. to receive your personal data from the controller in a structured, commonly used and machine-readable format and you have the right to transmit those data to another controller.

To exercise the above-mentioned rights, please contact us (contact details are indicated above)

If you think that your personal data is not processed by AVSystem in accordance with applicable data protection laws, please be informed that you have the right to lodge a complaint with the personal data protection authority in Poland, i.e. the President of the Office for Personal Data Protection (*Prezes Urzędu Ochrony Danych Osobowych*, 2 Stawki St., 00-193 Warszawa, Poland). If you reside in the European Economic Area, you can also lodge a complaint with a data protection authority in your country of residence

7) Recipients of data

Your personal data may be transferred:

- **to data processors involved in the providing services for us** (such as IT service providers). These entities will process your personal data pursuant to executed data processing agreements with us and exclusively based on instructions issued by us;
- **to external entities cooperating with us whose technologies we use** (in relation to data stored in some cookies);
- to entities authorized under applicable law, e.g., law enforcement agencies in the event of a request being made by the authority on a appropriate legal basis (e.g. for the purposes of criminal proceedings).

8) Transfer of personal data outside the European Economic Area (EEA)

We do not plan to transfer personal data to countries outside the European Economic Area, however in case of it's necessary your personal data will only be transferred to entities outside the EEA that provide the appropriate level of personal data protection required in the European Union (EU).

9) Safety

Using the Platform does not give any special dangers to users above the normal dangers associated with using the Internet. Despite this, we recommend you to be cautious and use software that protects against malware and other dangers related to the Internet (antivirus program, firewall).