

## TRUCKER APPS PRIVACY POLICY

Bearing in mind the importance of Personal Data protection, Trucker Apps Sp. z o.o. has created this Privacy Policy, which will tell what data we collect, for what purpose, on what basis and how Users can manage them. In addition, you will find information on what rights User has in relation to User's Personal Data and how is it possible to contact us.

The following describes the specific principles and purposes of the processing of Personal Data collected during User's use of the Application.

This Privacy Policy applies to the services offered by the Administrator through:

- a) the website: [www.truckerapps.eu](http://www.truckerapps.eu), including the sub-site <https://truckerapps.eu/transparking/pl/map/>;
- b) Mobile Applications:  
<https://play.google.com/store/apps/details?id=eu.transparking>  
<https://play.google.com/store/apps/details?id=com.glf25.s.trafficban>

The Administrator supports only Mobile Applications downloaded by the User from the Google Play mobile application shop and supported by the Android operating system:  
<https://play.google.com/store/apps/dev?id=8924830907973699961>.

The Privacy Policy does not cover third-party websites and services that can be accessed through links on the Applications. Detailed information on the protection of Personal Data is available separately from each of these service providers. The Administrator recommends that you always read these documents on the providers' websites.

### I. DEFINITIONS

Whenever the following terms are used in this Privacy Policy they shall be understood as:

- 1) Administrator - Trucker Apps sp. z o.o. with its registered office in Wysoka (52-200), ul. Chabrowa 4, entered into the Register of Entrepreneurs of the National Court Register kept by the District Court for Wrocław - Fabryczna in Wrocław, KRS: 0000519778, NIP: 8961538638, REGON: 3022470941,
- 2) Mobile Application - "TransParking - Truck Parking" and "Bans for Trucks", whose provider and operator is the Administrator,
- 3) Web Application - applications accessible via [www.truckerapps.eu](http://www.truckerapps.eu), whose provider and operator is the Administrator,
- 4) Application - Mobile Application and Web Application,
- 5) Personal Data - information about an identified or identifiable natural person,
- 6) Trans.eu Capital Group - entities belonging to the Administrator's capital group, the list of which is available under this link [www.trans.eu/pl/o-nas](http://www.trans.eu/pl/o-nas),
- 7) GDPR - 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,

- 8) User - any natural person who uses the Application regardless of whether the Application requires the creation of an account or allows access without logging in,
- 9) Trusted Partners - third parties whose services are used by the Administrator to provide the Application to the User, including Facebook, Google (e.g. Google Firebase, Google Ad Mob).

## **II. CATEGORIES OF PERSONAL DATA**

By using the Application, the User makes Personal Data available to the Administrator for processing, in particular his/her name, surname, image (if a photo is added), email address, other contact data, IP address and other identifiers and information collected through cookies or other similar technologies and geolocation data of the device.

The Application may process User's geolocation data "in the background", that is, when the User is not using the Application.

## **III. OBJECTIVES AND LEGAL BASIS FOR THE PROCESSING OF PERSONAL DATA**

### **A. Use of the Application**

The Administrator processes the Personal Data of Application Users collected during use of the Application without logging in:

- for the purpose of providing the User with services and maintaining them and for the purpose of ongoing User support, i.e. for the purpose necessary for the performance of the agreement concluded with the User or for the purpose of performing actions prior to the conclusion of the agreement (Article 6 1) b) of the GDPR);
- for analytical and statistical purposes, i.e. analysis of User activities and their preferences, in order to ensure IT security, improve functionality and the services provided, as well as for the Administrator's internal administrative purposes, such as the preparation of statistics - the legal basis of the processing is the Administrator's legitimate interest (Article 6 1) f) of the GDPR);
- in order to fulfil the Administrator's statutory obligations resulting in particular from tax and accounting regulations - the legal basis of processing is a legal obligation (Article 6 1) c) of the GDPR);
- in order to assert or defend against claims - the legal basis of the processing is the Administrator's legitimate interest (Article 6 1) f) of the GDPR),
- for marketing purposes of the Administrator and entities belonging to the Trans.eu Capital Group as well as other entities for which the Administrator provides services under separate agreements, in particular related to behavioral advertising.

### **B. Registration in Applications**

In order to make full use of the services offered by the Administrator, the User may register an account using the form provided on the web pages of the Web Applications or use the login option using the account previously created by the User on one of the social networks (Facebook or Google) on the Mobile Applications, in accordance with the Regulations set out in the Trucker Apps Regulations [https://truckerapps.eu/Regulations\\_TruckerApps\\_EN.pdf](https://truckerapps.eu/Regulations_TruckerApps_EN.pdf). In this case, the Administrator processes the User's Personal Data provided in the account registration form or retrieves from the User's account within the social network the Personal Data necessary to register and operate the account.

In order to facilitate service, the User may provide additional Personal Data in the settings of his/her account, which he/she may delete at any time. Providing Personal Data marked as obligatory is necessary to set up and operate an account. Providing additional Personal Data is voluntary and does not affect the possibility to create and maintain an account.

In the above scope Personal Data is processed:

- for the purpose of providing services related to the maintenance and operation of an account in the Applications - the legal basis for processing is the necessity of processing for the performance of an agreement (Article 6(1)(b) GDPR), and with regard to data provided optionally - the legal basis for processing is consent (Article 6 1) a) of the GDPR);
- for analytical and statistical purposes - the legal basis for the processing is the Administrator's legitimate interest (Article 6(1)(f) GDPR), consisting of an analysis of User activity in the Applications and the manner of using the account, as well as their preferences in order to improve the applied functionalities; in connection with the legitimate interest, the data may also be made available to Trans.eu Capital Group entities for the aforementioned purposes; in the case of expressing the relevant consent(s), these profiles may also be used to present advertisements adapted to User interests and preferences;
- in order to possibly determine the investigation or defence against claims - the legal basis of the processing is the Administrator's legitimate interest (Art. 6 par. 1 lit. f) GDPR);
- for marketing purposes of the Administrator and other entities.

### **C. Marketing**

The Administrator processes Users' Personal Data in order to carry out marketing activities, which may consist in:

- displaying marketing content to the User that is not adapted to his/her preferences (including contextual advertising);
- displaying marketing content corresponding to the User's interests (behavioural advertising);
- sending e-mail notifications about interesting offers or content that contains commercial information (newsletter service).

The processing of Personal Data for marketing purposes takes place in connection with the implementation of the Administrator's legitimate interests (Article 6 1) f) of the GDPR), on the

basis of consent (Article 61)a) of the GDPR) granted for specific purposes (e.g. sending data within the Trans.eu Group).

In order to carry out marketing activities, the Administrator may use data (and User profiles created on their basis) provided by the User in connection with the use by the User of services of other entities of the Trans.eu Capital Group.

The Administrator profiles Users' Personal Data which means the use of automated processing of Personal Data which involves the use of Personal Data to evaluate certain personal factors of a natural person; the Administrator evaluates selected factors concerning natural persons for the purpose of analysing their behaviour or predicting their future behaviour.

The Administrator and its Trusted Partners process information about Users collected through cookies and other similar technologies for marketing purposes, in connection with targeting Users with behavioural advertising. The processing of Personal Data for this purpose also includes profiling of Users. The use of Personal Data collected via this technology for marketing purposes, in particular to promote the services and goods of third parties, may require the User's consent. In this case, this consent may be withdrawn at any time through the relevant privacy settings in the Applications.

#### **D. Social media**

The Administrator Web Applications may include social networking plugins such as: Facebook, Instagram etc. In connection with their inclusion in the Administrator's Web Application, the User is obliged to read the privacy policies of these providers himself in order to receive up-to-date information on the protection of his Personal Data by these entities.

The Administrator processes the Personal Data of Users visiting the Administrator's social media profiles (e.g. Facebook, Instagram). The data are processed in connection with running the profile, organising contests by means of it and promoting various events, services and products. The legal basis for the processing of personal data by the Administrator for this purpose is its legitimate interest (Article 6 1) f) of the GDPR) consisting in promoting its own brand and products.

#### **IV. COOKIES AND SIMILAR TECHNOLOGIES**

Cookies are small text files stored on the User's device when browsing the Web Applications or using the Mobile Applications. In this Privacy Policy, information on cookies also applies to other similar technologies used within the Applications.

The Administrator uses so-called service cookies primarily to provide the User with services provided electronically and to improve the quality of these services. Therefore, the Administrator and other entities providing analytical and statistical services to the Administrator use cookies to store information or to access information already stored in the User's telecommunications terminal equipment (computer, telephone, tablet, etc.).

Cookies used for this purpose include:

- cookies with User data (session identifier) stored for the duration of the session (user input cookies);
- authentication cookies used for services that require authentication (authentication cookies);
- security cookies, such as those used for detecting authentication abuses (user centric security cookies);
- multimedia player session cookies (e.g. flash player cookies);
- cookies used for website traffic monitoring, i.e. data analytics, including Google Analytics cookies (these are cookies used by Google - i.e. the entity to which the Administrator entrusted the processing of personal data - to analyse the use of the Mobile Applications by the User, including the creation of statistics and reports on the functioning of the Mobile Applications).

The Administrator (first party cookie) and its Trusted Partners (third party cookie) also use cookies for marketing purposes, for which purpose the Administrator and the Trusted Partners store information or gain access to information already stored in the User's telecommunications terminal equipment (computer, telephone, tablet, etc.). The use of cookies and the Personal Data collected through them for marketing purposes, in particular to promote the services and goods of third parties, requires the User's consent. This consent can be withdrawn at any time through the settings of the User's browser or through the settings of the software installed in the User's device.

## **V. PERSONAL DATA RECIPIENTS**

Personal Data processed by the Administrator in connection with the provision of services in the Applications may be made available to external entities, including in particular:

- entities within the Trans.eu Capital Group,
- institutions statutorily authorised to receive Personal Data on the basis of applicable legal provisions, in particular courts, the police, the prosecutor's office.
- entities processing Personal Data on behalf of the Administrator and their authorised employees, whereby such entities process Personal Data on the basis of an agreement with the Administrator and only in accordance with the Administrator's instructions and subject to confidentiality. Entities performing tasks for and on behalf of the Administrator include those that provide services to the extent necessary to ensure the technical background for the provision of services in the Applications, such as IT service providers and maintenance entities. The Administrator shall exercise due diligence in the transmission of data by applying measures and safeguards to prevent unauthorised access to data (e.g. SSL, encrypted connections).

Trans.eu Capital Group companies will process Personal Data for analytical and statistical purposes, including for the purpose of building User profiles which will be used to improve the quality of services provided by Trans.eu Capital Group companies of the Administrator

and to adjust the content offered in the Applications. If the User gives the appropriate consent(s), profiles can also be used to present the User with advertisements tailored to his/her interests and preferences.

## **VI. TRANSFER OF PERSONAL DATA OUTSIDE THE EUROPEAN ECONOMIC AREA**

The level of protection for Personal Data outside the European Economic Area (EEA) may differ from that provided under European law. Bearing this in mind, the Administrator transfers Personal Data outside the EEA only when it is necessary. In the case of such transfer of Personal Data, the Administrator shall ensure an adequate level of protection of Personal Data primarily by:

- transferring Personal Data to countries with respect to which the European Commission has issued a decision recognising the country in question as providing an adequate level of protection for personal data;
- applying the standard contractual clauses issued by the European Commission;
- applying other adequate safeguards.

## **VII. THE RIGHTS OF THE PERSON WHO THE DATA CONCERNS**

As a User, you have the right to access User's Personal Data, as well as to request rectification, restriction or erasure of User's Personal Data, and to request transfers of User's Personal Data. If the legal basis for processing User's Personal Data is consent, you have the right to withdraw it at any time.

Additionally, User has the right to file a complaint to the supervisory authority, which is the President of the Personal Data Protection Office. Furthermore, User has the right to object at any time to the processing of User's Personal Data where the Administrator processes it on the basis of legitimate interests, inter alia for direct marketing purposes, including profiling.

Upon confirmation of the User's identity, the Administrator will exercise the above-mentioned rights on the basis of an analysis of the legitimacy of the request and the applicable legal provisions. The Administrator shall make every reasonable effort to comply with the Users' requests concerning the Personal Data, unless the data must be retained due to applicable law or other legitimate interests of the Administrator.

## **VIII. DATA STORAGE PERIOD**

Personal Data will be processed and stored by the Administrator:

- to the extent that the basis for processing is consent - until it is withdrawn;
- in the extent to which processing is based on a contract - for the time of use of the service, and after its performance - until the date of expiration of claims;
- to the extent that processing is based on a provision of law - for the period indicated in the provision;
- in the extent to which processing is based on the Administrator's legitimate interest - for the time of realization of this interest or until the User raises an objection to such processing, unless there are legitimate grounds for further processing of the data.

Data collected during visits to the Administrator's website will be processed until they become outdated or lose their usefulness. This applies to data processed for analytical and statistical purposes, including the use of cookies and administration of the Administrator's website.

Data may still be stored in our system if:

- it is not possible to delete it immediately for technical reasons,
- the immediate deletion of the content would limit our ability to investigate and to determine whether there is any unlawful activity or violation of our rules and regulations, to comply with a legal obligation such as preserving evidence, or to comply with a request from a judicial or administrative authority, law enforcement agency or public administration.

In such situations, Data will be retained for no longer than is necessary for the purposes for which it was retained.

## **IX. OTHER INFORMATION ABOUT USER**

When using the Application, information that the User's browser automatically sends to the Administrator is collected and stored for organisational and technical reasons. This is information such as: browser type/version, operating system.

## **X. COOPERATION WITH EXTERNAL SUPPLIERS**

In order to be able to properly deliver the Service, we use the services of other entities that process Personal Data on our behalf. We enter into processing agreements with these processors. Processors may include, but are not limited to, Google and Facebook (enabling User to log in to the Mobile App using User's accounts with these services), financial service providers handling payments for the App, providers of an email campaign sending tool, administrative support for the Administrator. As we provide the service through Google's marketplace - Google Play, Google Ireland Limited is our main third party provider.

In addition, we use Google tools to display advertisements on our Applications. In connection with this cooperation, Google may place cookies (and other such technologies) from Google on Users' terminal equipment or access information about the User.

## **XI. SECURITY MEASURES TAKEN**

We take technical and organisational security measures to protect Personal Data against loss, destruction and unauthorised access. All our employees and all persons involved in data processing are obliged to comply with data protection regulations and to maintain the confidentiality of Personal Data. Where possible, information (including Personal Data) is transmitted in encrypted form to prevent misuse by third parties. Our employees are trained in the protection of Personal Information, and where Personal Information is transferred to a third party, we contract with the third party to ensure that it applies at least the same level of

security and protection to the Personal Information. Our security measures are constantly updated.

## **XII. AGE RESTRICTIONS**

The Applications provided by the Administrator may only be used by persons who are at least 16 years old. We do not process Personal Data or other information of Users below the aforementioned age limit.

## **XIII. USE OF DATA PROVIDED BY THE USER (INCLUDING COPYRIGHT TRANSFER)**

By using our Applications, you can find out about the infrastructure at a given car park, including its security features (such as fencing, lighting, monitoring), facilities (such as a shower, medical point, wi-fi) or additional amenities (such as an ATM, shop, petrol station). Some of the information, especially photos and comments, come from the Users themselves.

The User owns the intellectual property rights to the content he creates and makes available in the Application. By publishing content (including photos and comments) in the Application you grant the Administrator a non-exclusive, transferable, including the right to sub-licence, free and global licence to use, exploit, distribute, modify, launch, copy, publicly perform or display, translate the content made available in the Application.

The Administrator acquires rights in all existing fields of exploitation, in particular:

- in terms of recording and multiplication - production by any technique known at the date of acceptance of the Privacy Policy, including digital technology;
- within the scope of turnover the original or copies on which a given item of intellectual or industrial property has been recorded - marketing, sale, lending or lease;
- within the scope of dissemination of a given intellectual or industrial property item in a manner other than specified above - public display, screening, reproduction, broadcasting and rebroadcasting as well as making the intellectual or industrial property item available to the public in such a way that everyone can have access to it in a place and at a time chosen by themselves.

This means that you agree that we may show other Users of the Application, for example, pictures you have taken of the car park and its surroundings or other content you have added to the Application. You also agree that we may sell such content and provide it to other third parties.

After the User ceases to use the Application, the aforementioned content remains on the Administrator's systems. The Administrator also retains the rights to further use including distribution of the content entered into the system by the User. The licence is granted in perpetuity.

## **XIV. CONTACT**

If you have any questions you can contact us by writing to: [info@truckerapps.eu](mailto:info@truckerapps.eu) or to the address: Trucker Apps sp. z o.o. based in Poland, 4 Chabrowa Street, 52-200 Wysoka.

## **XV. FINAL PROVISIONS**



We may update this Privacy Policy from time to time to reflect changes in our information handling practices and standards. Such modifications may be made without notice to the User. If there are any material changes that modify the way we process User's Personal Information, you will be notified by email or by means of a notice made available on the Website.