

Vasco Electronics devices privacy policy

B2B

This Policy explains how Vasco Electronics processes data provided by the Customer (Data Administrator) to Vasco in the course of using Vasco services.

Personal data means any information in electronic or other form which, either alone or in combination with other data, may be used to identify an individual or to enable such identification.

This Policy applies to all Vasco Electronics products intended for use by business entities.

The purpose of the entrustment is to provide the Administrator with translation services using translation devices manufactured by Vasco.

Vasco processes personal data only on documented instructions from the Data Administrator. For "documented administrator's instruction" in accordance with Art. 28 section 3 letter a) GDPR means transferring data by the Administrator to Vasco in order to provide services (e.g. by starting translations via device).

The Administrator entrusts the device to his clients, employees or collaborators (User) and undertakes to ensure control over what personal data will be transferred to Vasco. The Administrator is responsible for introducing rules for the use of devices that take into account the interests of the Administrator and Users (including trade secrets, sensitive data).

I. Vasco details and contact details

Vasco Electronics Góral ski Group S. K. A. (Polish limited joint-stock partnership) with its seat in Kraków at Aleja 29 listopada 20 31-401 Kraków, NIP 6772369151, hereinafter referred to as (Vasco, Vasco Electronics or Administrator).

II. Categories of data processed on device

Vasco receives Users' data provided to it by the Administrator to a limited extent, including data related to the device and the exchange of information by the User. At the same time, Vasco Electronics is not responsible for the accuracy or legality of the data entered as part of the use of this service. The information mentioned constitutes the following categories of personal data:

1. **Device and application information.** Data such as device name, device identification code (IMEI, ESN, MEID and SN), device session ID, device activation time, device model, operating system version, application version, software identification code and device and application settings (such as region, language, time zone and font size), phone number, serial number, sales code, access registration, current software version, country identification number (MCC), mobile network identification number (MNC), MAC address, IP address, cookies, subscription information and device settings used to access the Services.
2. **Information on the use of the devices.** Data such as access time, IP address and event information (such as errors, suspensions, restarts and updates to new versions) and other diagnostic, technical, error and usage information, such as the time and duration of use of the Services, the terms you enter on your device and any information stored in cookies placed on your device.
3. **User identification - data and image.** Some products allow Users to communicate and exchange information with others. When you use Vasco Electronics products to share content with other people, you may need to create an ID containing certain User data that will be disclosed in the public domain, including a pseudonym and possibly an avatar which may contain the User's image.
4. **Data obtained from the User and data of third parties.** Vasco Electronics will process data entered by the User (e.g. data included in the translation - text / photo / voice) and data related to people whose data has been provided by the User by placing them in the translation content (text / photo / voice), using chat or providing third parties with the translation via the device. They will include data: names, e-mail addresses, telephone numbers and employment data. Vasco Electronics will take appropriate and necessary measures to ensure the security of information obtained from Users. Administrator's responsibility to make sure that the persons to whom he provides information have given their consent to provide this information to the Administrator and that User has fulfilled the information obligation resulting from the generally applicable provisions of law (e.g. GDPR).

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

Vasco devices may use Users' personal data depending on the category of such data for the specific purposes described below:

1. **Purpose - Technical service,** For the categories of personal data indicated in part II points 1 - 2:
 - a) providing technical support;
 - b) sending operating system and application updates and notifications about software installations;
 - c) analyzing the performance of business operations and measuring market share, and consequently improving Vasco's products and services;
 - d) synchronizing data necessary to carry out the operation of sending or downloading data;

- e) collecting analytical data in order to increase the accuracy of the translations performed and to adapt the services to the User;

We process the above data to fulfill our obligations towards Administrator, in particular for the proper delivery of the service (Article 6 (1) (b) of the GDPR), and also due to the fact that we have legitimate interests in providing technical support and development and increasing the security of our services (Article 6 (1) (f) of the GDPR).

2. **Purpose - Provision of Services.** Category of personal data indicated in Part II points 3-4:

- a) provision of services for Administrator
- b) delivery of all device functionalities;
- c) fulfillment of legal obligations incumbent on the Administrator.

We process the above data to fulfill our obligations towards the Administrator, in particular for the proper delivery of the service (Article 6 (1) (b) of the GDPR). The above data may also be processed in order to ensure compliance with the law and compliance with legal procedures, including protection of the interests of the Administrator or the User (Article 6 (1) (c) of the GDPR).

IV. Information on the recipients of personal data

We do not share personal data with other entities or persons except as described below:

1. **Sharing personal information within the scope of applicable law:** We may share information, to the extent required by applicable law, for the purpose of resolving legal disputes or at the request of administrative and judicial authorities, in accordance with applicable law.
2. **Sharing your information with affiliates:** your information may only be shared with affiliates for clearly described and legitimate purposes, and such sharing is limited to information required in connection with specific services, for example to provide translation services to the Administrator.
3. **Sharing with service providers:** We may also share User data with companies that provide us with services related to our current operations. Examples of such service providers include companies, consultants, accountants, lawyers, programmers, etc.

We ensure the legality of the data sharing and sign strict confidentiality agreements or data processing agreements with companies, organizations and individuals to whom we share personal data, ensuring that both parties comply with this policy and take appropriate measures to ensure confidentiality and security during data processing.

When it comes to cooperation with entities located outside the European Union we choose only those that are listed on the appropriate data privacy framework list or those that will conclude a personal data entrustment agreement with us on the basis of standard contractual clauses approved by the European Commission.

V. Information on the intention to transfer personal data to a third country or international organisation

Some of our service providers are based outside the European Economic Area, but due to the type of services and the global scope of their operations they apply the highest global standards. We ensure the lawfulness of data processing with all service providers and sign strict confidentiality agreements or data processing agreements ensuring that both parties to the agreement comply with the relevant standards.

Our translation service providers process data only for the duration of the translation. However, some providers of services other than translation services (e.g. the translation content share feature) may store data for a longer period of time.

VI. Information on appropriate safeguard measures

Vasco takes the following measures to protect your data and to prevent unauthorized access or disclosure, use, modification, damage or loss:

1. We take reasonable and feasible measures to collect only the minimum amount of personal data relevant and necessary for the purposes for which they are processed. We keep your personal data only as long as necessary for the purposes set out in this policy and in the product or service specific privacy information, unless an extension is required or permitted by law;
2. We use technologies, such as encryption techniques, to ensure the confidentiality of data during transmission. We implement proven security mechanisms to protect your data and the servers on which it is stored against attacks;
3. We use access control mechanisms to ensure that only authorised personnel have access to personal data. In addition, we limit the number of authorized employees and apply a hierarchical management of the authorization depending on the requirements of the position and level of the employee;
4. We carefully select business partners and service providers and integrate data protection requirements into business contracts, audits and evaluation activities;
5. We organise training, testing and information activities on security and privacy in order to raise awareness of data protection among our employees.

Despite the high level of care taken in protecting personal data, no security measures are perfect and no products, services, websites, data transmissions, computer systems or network connections are 100% secure.

Vasco undertakes to ensure confidentiality referred to in Art. 28(3)(b) GDPR, data processed by persons who authorize the processing of personal data for the purpose of implementing this contract, both during and after their employment.

Administrator in accordance with Art. 28 section 3 point h) of the GDPR has the right to check whether the appropriate security measures used by Vasco to process and secure the entrusted personal data meet the provisions of this Policy. In each case of a change in the

nature, context and purpose of processing by the Administrator, Vasco is obliged to confirm the validity and adequacy of the technical and organizational measures used. The data administrator will exercise the right of inspection during Vasco's working hours after informing Vasco at least 14 business days before carrying out the inspection.

VII. The period for which personal data will be stored and, where this is not possible, the criteria for determining this period

Vasco Electronics introduces the principle of full data minimization in the scope of services provided to business entities. This also applies to their processing time. By default, all data entered into the device is processed only for the period necessary to perform translation and technical support of the service provision process.

By using device functionality for sharing translation content you need to be aware that once the content is submitted to the email provider, the PDF files are removed from our API. The email provider stores the shared content and identification data in accordance with the retention periods mentioned below:

MESSAGE CONTENT (for the time necessary to deliver content to the recipient)	UP TO 72h (in case of failure of message delivery)
RANDOM CONTENT SAMPLES	UP TO 7 DAYS
IDENTIFICATION DATA (E-MAIL ADDRESS)	UP TO 37 DAYS
DATA ON EMAIL HANDLING EVENTS IN PSEUDONYMIZED FORM	UP TO ONE YEAR

Personal data processed in order to conclude or perform the contract and fulfill the legal obligation of the Administrator, i.e. pursuant to Article 6 (1) (b) and (c) GDPR will be kept for the duration of the Agreement, and after its expiry for the period necessary to fulfillment of the Administrator's legal obligation (e.g. resulting from tax or accounting regulations),

Personal data processed on the basis of a legitimate legal interest according to Article 6 (1) (f) GDPR will be processed until a lawful justification for this process.

Personal data processed on the basis of a separate consent will be stored until its revocation.

VIII. Children's personal data

Our devices are designed for adults. If children's personal information is collected on the basis of the parental authority's consent provided to the Administrator, we use or disclose this information only in a way that is legally permitted, expressly authorized by the parental authority. If we become aware of the processing of children's personal data without the consent of those who can prove that they have parental authority, we will delete the data immediately.

IX. information on the right to request the Administrator to access, rectify, erase or limit the processing of personal data concerning the data subject, or to object to the processing, as well as on the right to data portability

You have the right of access to the content of the data, the right to request rectification, deletion, restriction of processing, the right to transfer data and the right to object to the processing. For the exercise of these rights, you may apply directly to the Administrator.

Requests will be executed by deleting information, blocking related functions or setting up your privacy options. In some cases, this may limit your ability to use certain Services. Due to the nature of the technological process and the fact that the Processor stores any User data for a period longer than the translation time, it may not be possible to exercise the individual rights of the entity that applies to the processing.

X. Information on the right to file a complaint to a supervisory authority

If you consider the processing of the data to be illegal, you have the right to file a complaint with the supervisory body dealing with the protection of personal data, i. e. to the President of the Office for Personal Data Protection

XI. Changes to the Privacy Policy

In order to update the information contained in this Privacy Policy and its compliance with applicable law, this Privacy Policy may be changed. The Administrator and the User will be notified of any change to the policy through information placed on the device or on Vasco's website. In order to obtain information on the method of personal data protection, Vasco and the Administrator recommends Users to regularly read these principles of the Privacy Policy.