

Vasco Electronics devices privacy policy

This Policy explains how Vasco Electronics processes persons or entities that use Vasco devices ("User").

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.

We do not describe all the procedures for the services available on your device. Therefore, before you start to use a particular product or service, we recommend that you read the privacy statement that is published for that product or service, to find out about the applicable processing of personal data.

This Policy applies to all Vasco Electronics products for private and home use, including electronic translators. However, some provisions of the Policy may not apply to some devices due to differences in the functionalities that are available on different devices.

Some of the data processed on the devices may not be considered as personal data because the User cannot be identified from these data. Vasco collects statistical data in order to learn how Users use its products and services. This process allows us to improve our services and to fulfill User requirements.

I. Administrator details and contact details of the Administrator's representative

The administrator of personal data is Vasco Electronics Góralski Group S. K. A. (Polish limited joint-stock partnership) which has its headquarters in Kraków at Aleja 29 listopada 20 31-401 Kraków, NIP 6772369151. This company is hereinafter referred to as Vasco, Vasco Electronics or Administrator.

II. Categories of data processed on devices

Vasco collects data from Users; it also collects data related to Users' devices and the information that the User and their device exchange with the products and services offered by the Administrator and related parties (translation data - input and output data). Vasco

Electronics is not responsible for the correctness or lawfulness of the data entered when using this service. The information mentioned above 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, number of accesses, 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 that you enter on your device and any information stored in cookies that are placed on your device.
3. **Location data.** Vasco collects, uses and processes the approximate or exact location of your device when you use location-based services (e. g. when you are searching for information, using navigation software, or checking the weather in a particular location). Location data can be obtained from GPS and WLAN systems and from the network identifier of the telecommunications service provider. If you wish to withdraw or deny permission to share location-related information, go to your device settings menu and deactivate the permission to use your location for certain services. If you withdraw your permission, this may affect the availability of certain application options or device features.
4. **E-mail address.** In order to use certain functions or services, you need to register or log in with your e-mail address.
5. **User identification data and user image.** Some products allow Users to communicate and exchange information with other people. When you use Vasco Electronics products to share content with other people, you may need to create an ID that contains certain user data that will be disclosed in the public domain. This ID may include a pseudonym and/or an avatar which may contain the User's image.
6. **Data obtained from the User and data of third parties.** Vasco Electronics may process data that is entered by the User (e.g. data included in the translation - text / photo / voice) and data related to people whose data has been included in the translation content (text / photo / voice) by the User via chat applications or by providing third parties with the translation via the device. These data include: names, e-mail addresses, telephone numbers and employment data. Vasco Electronics will take appropriate and necessary measures to ensure that information obtained from Users is secure. It is the User's responsibility to make sure that the persons whose information they provide to the Administrator have given their consent to this, and that the User has fulfilled the information obligations that result from the applicable provisions of law (e.g. GDPR).

7. **User's voice information and voice recordings:** Audio does not allow us to identify the owner and Vasco does not use voice data/the voice application for this purpose. The recordings are made when the User uses voice commands to translate spoken phrases. Voice translation and speech transcription services are provided in cooperation with external service providers who offer speech to text conversion services on Vasco's behalf. These service providers may receive and store specific voice instructions in accordance with a contract between Vasco and a trusted third-party service provider. In addition, voice recordings may be used as part of remote user services (e.g. customer service hotline) and for the purpose of improving our technologies, and constantly improving the quality of our Services.
8. **Photo and data included in the photo.** Data obtained from the Service that enables the User to share a photo and text along with an automatic translation. The photo is stored on Vasco Electronics' servers for 10 minutes, after this time it is automatically and permanently deleted from them. If the User provides third-party data in this way, said User declares that they have the consent of these third parties to provide such data. This consent includes personal data for which the User has fulfilled the information obligation resulting from the generally applicable provisions of law (e.g. GDPR).
9. **Cookies.** Some of our devices use Cookies on account of installed software or applications. These are IT data, usually text files, which are stored on the user's end device. They usually include the name of the website from which they come, the storage time and the ID number.

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

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

1. **Purpose - Technical service, analytical processes.** For the categories of personal data indicated in part II points 1 - 3, 6 - 7 and 9:
 - a) providing technical support, including, in particular, the detection, analysis and debugging of errors;
 - b) sending operating system updates and application updates and notifications about software installations;
 - c) providing Users with personalized services and content;
 - d) conducting internal audits, data analysis and research;
 - e) analyzing the performance of business operations and measuring market share, and consequently improving Vasco's products and services;
 - f) synchronizing, sharing and storing data sent or downloaded by Users, and data necessary to send or download data;
 - g) 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 Users, and in particular to ensure the proper delivery of the service (Article 6 (1) (b) of the GDPR). We also process this data because we have a legitimate interest in providing technical support and development, and in increasing the security of our services (Article 6 (1) (f) of the GDPR).

2. Purpose - Conclusion of the contract. For the categories of personal data indicated in Part II, points 4-5:

- a) concluding a contract with the User, as well as providing, activating and verifying or changing the services ordered;
- b) creating and maintaining a User account;
- c) User service;
- d) sending operating system and Software updates and notifications about software installations;
- e) conducting accounting and legal processes.

We process the above data to fulfill our obligations towards Users, in particular to ensure the proper provision of the service (Article 6 (1) (b) of the GDPR), and due to the fact that we have legitimate interests in establishing the legal relationship between us and the User (Article 6 (1) (f) of the GDPR). The data in the above scope may also be used with the prior consent of the User who provided us with their data for processing (Article 6 (1) (a) of the GDPR). The above data may also be processed to ensure compliance with the law and compliance with legal procedures, including the protection of the interests of the Administrator or the User, as well as for accounting purposes (Article 6 (1) (c) of the GDPR).

3. Purpose - Provision of Services. For the categories of personal data indicated in Part II points 1-9:

- a) provision of data controller and / or third party services, in particular the possibility of translating;
- b) delivery of all device functionalities;
- c) prevention of loss and protection against fraud;
- d) protection of the legal interest of the Administrator and / or of the User;
- e) fulfillment of legal obligations incumbent on the Data Administrator.

We process the above data to fulfill our obligations towards Users, and in particular to ensure the proper delivery of the service (Article 6 (1) (b) of the GDPR). We also process this data because we have legitimate interests in development and increasing the security of our services (Article 6 (1) (f) of the GDPR). The data in the above scope may also be used with the prior consent of the User who provided us with their data for processing (Article 6 (1) (a) 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).

4. **Purpose - Marketing.** For the categories of personal data indicated in Part II, points 4, 5 and 9:
 - a) advertising and marketing services;
 - b) conducting promotional activities and discount campaigns;
 - c) sending commercial information, offers and price lists;

We process the above data with the prior consent of the User who provided us with their data (Article 6 (1) (a) of the GDPR). Data may also be processed for the above purposes if there is a legitimate interest in doing so (Article 6 (1) (f) of the GDPR).

IV. Information on the recipients of personal data or the categories of recipients

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

1. **Sharing upon consent:** Once we have received your consent to share your personal data, Vasco will provide certain other companies or categories of other companies with the information covered by your consent;
2. **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.
3. **Sharing your information with affiliates:** Your information may only be shared with affiliates for clearly described and legitimate purposes. This sharing is limited to information that is required in connection with specific services, for example, to provide services to you.
4. **Sharing with business partners:** Some of the services and applications that are installed on the device are provided directly to Users by our partners. Vasco may also share your information with such partners and they may use this information to provide you with the products or services that you request, to anticipate your interests and to provide you with advertising, promotional and other materials. These entities will usually ask the User to read and accept their Privacy Policy before starting to provide services.
5. **Sharing with service providers:** We may also share User data with companies that provide us with services that are related to our current operations. Examples of such service providers include companies, consultants, accountants, lawyers, programmers, etc.

We ensure that our data-sharing is legal and we sign strict confidentiality agreements or data processing clauses with companies, organizations and individuals with which we share personal

data. We ensure that both parties comply with our data-sharing policy and we take appropriate measures to ensure confidentiality and security during data processing.

Websites, software, products and services may contain links to third-party websites, products and services. All links to third-party websites, products and services are provided solely for your convenience. The procedures for using these links should be determined by the User. Before sharing your personal information with other companies you should read their privacy policy.

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

Some of our service providers are based outside the European Economic Area, but due to the type of services that they offer 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 clauses to ensure that both parties to the agreement comply with the relevant standards.

VI. Information on appropriate safeguarding measures

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

1. We take reasonable and feasible measures to collect only the minimum amount of personal data that is relevant and necessary for the intended processing purpose. We keep your personal data only for as long as necessary a) for the purposes set out in this policy and b) to comply with the privacy information that is specific to the product or service concerned. This period is only extended if this is required or permitted by law;
2. We use technologies, such as cryptographic techniques, to ensure the confidentiality of data during transmission. We implement proven security mechanisms to protect both your data and the servers on which it is stored against attacks;
3. We use access-control mechanisms to ensure that only authorized personnel have access to personal data. In addition, we limit the number of authorized employees and apply hierarchical management of the authorization system according to the requirements of the position and the seniority 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 organize 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.

VII. The period for which personal data will be stored and the criteria for determining any alternative period of time that may be necessary

We process data for the time that is necessary to provide services and to use the equipment and its functions. We also process data for the time that is necessary to address claims that are related to the fulfillment of our responsibilities. Personal data this is processed in order to conclude or perform the contract and to fulfill the legal obligation of the Administrator, i.e. pursuant to Article 6 (1) (b) and (c) of the GDPR will be kept for the duration of the Agreement; after the Agreement has expired, said data will be kept for the period necessary to:

- a) perform after-sales customer care services (e.g. handling complaints);
- b) secure or pursue any legal claims arising on account of the Administrator or the User (data kept for a maximum of 6 years from the date of termination of the contract, and up until the end of the calendar year in which the 6-year period expires);
- c) fulfill the Administrator's legal (e.g. resulting from tax or accounting regulations);
- d) prepare statistics and complete archiving procedures.

Personal data that is processed on the basis of a legitimate legal interest according to Article 6 (1) (f) GDPR will be processed until an objection is raised by the data subject, unless the Administrator is able to find a lawful justification for continuing this process.

Personal data that is processed after separate consent has been given will be stored until such consent is revoked.

In order to be transparent and accountable and to prove compliance with the provisions on the processing of personal data, the Administrator will store data for the statutory period required a) to fulfill its own legal obligations and b) to enable the public authorities to fulfill their legal obligations.

Information regarding the period of time for which our Service Providers can process data is specified in their privacy policies.

VIII. Children's personal data

Our devices are designed for adults. If children's personal information is collected with parental consent, we only use or disclose this information in a way that is legally permitted, that is expressly authorized by the parental authority or that is necessary to protect the children in question. If you have parental authority and would like to access, modify or delete the personal information of your children or of persons under your legal guardianship, you can contact us through the contact details provided in this Policy or provided on our website. If we discover that

children's personal data is being processed without parental consent, we will delete the data immediately.

IX. Information on the right to access, rectify, erase or limit the processing of personal data, or to object to the processing, as well as on the right to data portability

You have the right to access the data, the right to ask for it to be rectified or deleted, the right to restrict processing, the right to transfer data and the right to object to processing of data.

To exercise these rights, you can contact us:

- a) by e-mail at - gdpr@vasco-electronics.com
- b) or by post at al. 29 listopada 20, 31-401 Kraków, Poland

In your request, please provide data that will allow us to identify you.

You may change the approved scope of the collection of personal data or withdraw your consent to the collection of personal data, however, this does not affect the lawfulness of the data processing that has resulted from this consent and that took place before said consent was withdrawn.

Requests will be executed by deleting information, by blocking related functions or by setting up your privacy options. In some cases, this may limit your ability to use certain Services.

There are certain circumstances in which the Administrator is not obliged to comply with the request. The Administrator should delete the data as requested when:

- a) personal data are no longer necessary for the purposes for which they were collected or for which they were otherwise processed;
- b) the data subject has withdrawn their consent to processing in accordance with Article 6 (1) (a) GDPR or Article 9 (2) (a) GDPR and there is no other legal basis for the processing;
- c) the data subject files an objection pursuant to Article 21 (1) GDPR and there are no overriding legitimate grounds for processing or when the data subject files an objection pursuant to Article 21 (2) GDPR in relation to processing;
- d) personal data was processed illegally;
- e) personal data must be deleted in order to comply with a legal obligation under European Union law or the law of its Member State to which the Administrator is subject;
- f) personal data have been collected in connection with the offer of information society services referred to in Article 8 (1).

Although there may be grounds for deleting personal data as requested by the data subject, situations could arise where further processing of the data is necessary, and this processing justifies a refusal to delete the data. These include cases where data are necessary:

- a) to exercise the right to freedom of expression and freedom of information;
- b) to fulfil a legal obligation under EU law or under the law of the Member State to which the Administrator is subject; or to perform a task carried out in the public interest; or to exercise the public authority entrusted to the Administrator
- c) on the grounds of public interest in the public health, pursuant to Article 9 (2) (h) and (i) and Article 9 (3) GDPR;
- d) for archival purposes in the public interest, for scientific or historical research purposes or for statistical purposes in accordance with Article 89 (1) GDPR insofar as the right to delete personal data is likely to make the purposes of such processing impossible or to seriously impede said purposes;
- e) to file, pursue or defend claims.

Some of the services and applications on your device use data input. These services and applications include Speech and the translation of text for scientific purposes and for the development of technology. We also use data to improve our software's ability to "learn" and in order to continuously improve the available functions and the quality of translations. Consent to the processing of data for this purpose and scope has no time limit. The data collected are not used to identify the persons who provided said data.

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

If you believe that data is being processed illegally, you can file a complaint with the supervisory body responsible for personal data protection, i.e. the President of the Office for Personal Data Protection.

XI. Cookies

Cookies are created and stored when the Administrator's services are used. The Administrator uses data collected for marketing and optimization purposes. The Administrator can create anonymous usage profiles from the cookie files obtained. Such User profiles are analyzed by the software and are used to improve and customize the Administrator's Devices and Services. The data collected in this way will not be used for the personal identification of Users without their express consent. Cookies are collected by the Administrator for the purposes of:

- a) adaptation and website content of the services provided;
- b) User authentication in connection with the use of services;
- c) configuration of selected functions of the device;

- d) analysis, research and audit of the type of device and the method of using it; the creation of anonymous statistics that help to show how Users use the Administrator's devices and services;
- e) provision of advertising services presented through own services and products;
- f) ensuring the safety and reliability of the website, its data and content.

Users may independently and at any time change the way in which Cookies access their device or are stored on it. The User can make the above changes via the device settings or the web browser.

XII. Changes to the Privacy Policy

This Privacy Policy may be amended or updated to ensure that it complies with applicable law. The User will be notified of any change to the policy through information placed on the device or on the Administrator's website. Any Users who wish to obtain information regarding personal data protection should regularly check the Privacy Policy.