

## **PRIVACY POLICY**

Last update: 2018-05-23

Orio AB and its subsidiaries undertake to respect and protect your personal data and your personal integrity in accordance with applicable laws. This Privacy Policy (hereinafter "Policy") informs you why Orio collects, uses or shares your personal data in connection with your relationship with Orio. Please read this Privacy Policy carefully.

### **1. DATA CONTROLLER**

The data controller for your personal data in accordance with the applicable data protection law is Orio (hereinafter together "Orio", "we", "us" or "our"). Orio is responsible for ensuring that your personal data is processed in compliance with this Policy and applicable data protection laws.

Local contact details of the data controller for users in Germany and Austria:

Orio Deutschland GmbH, Datenschutzbeauftragter  
HRB 94950  
Address: Mergenthalerallee 73-75, 65760 Eschborn, Germany  
Phone: +49 (0) 6196 2079 0  
E-mail: [info-de@orio.com](mailto:info-de@orio.com)

If you would like to contact us, you can do so by using any of the above contact details. Please address all letters and e-mails with "GDPR" as the subject/header.

### **2. COLLECTION OF PERSONAL DATA**

We may collect your personal data through different means, which are explained below. As a rule, the personal data processed by us is provided by you when registering with us as a customer or as a member, or otherwise being in touch with us (for example, through our website forms or customer service). We may also collect personal data from external sources. The personal data we collect includes e.g. the following categories of data:

- General personal data, such as name, date of birth and identification number;
- Contact details, such as email address, address and phone number. From business customers, we may also collect relevant information concerning your position and contact details within the company you represent;
- Information relating to customer relationship, such as customer interaction, customer contacts and replies, billing and credit information. Information about your vehicle that could indirectly be traced to you will also be documented, such as registration numbers.
- IP-adress

### **3. PURPOSE AND LEGAL BASIS FOR PROCESSING PERSONAL DATA**

We process personal data for the following purposes:

#### **1. Service provision and managing your customer relationship**

The primary purpose of collecting your personal data is to provide our services to you and to manage and maintain the customer relationship between us and you/the company you represent. In this case, our processing of personal data is based on the contract between you/the company you represent and us.

#### **2. Marketing**

We may send you emails and text messages to inform you about new features of our services, ask you for feedback, or provide you other relevant information about our services. In this respect, processing of personal data is based on our legitimate interest to provide you relevant information about Orio and to promote our services to you. You may opt-out from marketing communications at any time. ([Link to unsubscribe](#))

#### **3. Service development and information security**

We also process personal data to improve the quality of our services and to develop new ones. In these cases, the processing of personal data is our legitimate interest to ensure that we have sufficient and relevant information at hand to develop our services.

#### **4. Billing related data**

We also process personal data to fulfil our obligations under applicable accounting and tax laws. In these cases, the processing of personal data is based on mandatory legal provisions which require that we store certain data for accounting purposes.

### **4. TRANSFERS AND DISCLOSURES OF PERSONAL DATA**

We may disclose personal data to third parties:

- when permitted or required by law, e.g. to comply with requests by competent authorities or related to legal proceedings;
- when our trusted services providers provide services to us on behalf of us and under our instructions. We will control and be responsible for the use of your personal data at all times;
- if we are involved in a merger, acquisition, or sale of all or a portion of our assets; and
- when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request.

## **5. TRANSFERS OF PERSONAL DATA OUTSIDE THE EU/EEA**

ALL information that we collect from you is stored within the European Economic Area (EEA), but may also be transferred and Processed in countries outside of the EEA. All such transfers of your personal data will be in accordance with applicable laws.

## **6. COOKIES**

We also use cookies and other similar techniques on our websites. Cookies are small text files placed on your device to collect and remember useful information, to increase the functionality of our website and to make it easier to use. We may also use cookies and other similar techniques for statistical purposes to compile anonymous, aggregated statistics thereof, concerning e.g. the use of the website, allowing us to understand how users use the website and improve user experience.

You can set your web browser not to accept cookies, limit the use of cookies or remove cookies from the browser. However, as cookies are an important part of how our website works, limiting the use of cookies may affect the functionality of the website.

To learn more about how we use cookies, please [see our cookie policy here](#).

## **7. RETENTION OF PERSONAL DATA**

Your personal data will be retained only for as long as necessary to fulfill the purposes defined in this Policy.

### **1. Customer**

Most of your personal data will be retained during the course of your customer relationship with Orio. Some personal data might be retained after your customer relationship with us has ended, if required or allowed by applicable laws. For example, we keep accounting related documents for 7 years. When your personal data is no longer required by law or rights or obligations by either party, we will delete your personal data.

### **2. Member**

As a member at Orio we will save your information until you withdraw your consent.

## **8. YOUR RIGHTS**

You have a right to access personal data we process about you. You may access, correct, update, change or remove your personal data at any time. However, please note that certain information is strictly necessary in order to fulfil the purposes defined in this Policy and may also be required by law. Thus, you may not remove such personal data.

You have a right to object for certain processing. To the extent required by applicable data protection law, you have a right to restrict data processing.

You have a right to data portability, i.e. right to receive your personal data in a structured, commonly used machine-readable format and transmit your personal data to another data controller, to the extent required by applicable law.

Please send above-mentioned requests by using the contact details stated above in the Policy in point 1.

If you think there is a problem with the way we are handling your personal data, you have a right to file in a complaint to your national data protection authority in the EU/EEA. In Germany, that is the federal delegate for data protection. You can find contact details of the data protection authority here: <http://www.datenschutz.bund.de>.

In Austria, that is Österreichische Datenschutzbehörde. You can find contact details of the data protection authority here: <https://www.dsb.gv.at/kontakt>

## **9. SECURITY**

We maintain reasonable security measures (including physical, electronic, and administrative) to protect personal data from loss, destruction, misuse, and unauthorized access or disclosure. For example, we limit access to personal data to authorized employees and contractors who need to know the information in the course of their work tasks.

Please be aware that, although we endeavour to provide reasonable security measures for personal data, no security system can prevent all potential security breaches.

## **10. CHANGES TO THIS POLICY**

We may change this Policy from time to time. If we make any changes to this Policy, we will let you know on our websites and via the applications, where you will also find the latest version of this Policy.

## **11. CONTACT US**

If you have any questions regarding this Policy or the personal data we process about you, please use the contact details stated above in the Policy in point 1.