

Privacy policy reev Dashboard

We operate our websites in accordance with the principles set out below:

We undertake to comply with the statutory provisions on data protection and endeavour to observe the principles of data avoidance and data minimisation at all times.

1. Name and address of the controller and the data protection officer

a) <u>The person responsible</u>

The controller within the meaning of the General Data Protection Regulation and other national data protection laws of the member states of the European Union as well as other data protection regulations is

reev GmbH Sandstraße 3 80335 Munich

+49 (0) 89 21538970 info@reev.com

https://dashboard.reev.com

b) The Data Protection Officer

The data protection officer of the controller is:

SiDIT GmbH Langgasse 20 97261 Güntersleben E-Mail: <u>info@sidit.de</u> Website: <u>https://sidit.de/</u>

2. Explanation of terms

We have designed our privacy policy in accordance with the principles of clarity and transparency. However, if there are any uncertainties regarding the use of various terms, the corresponding definitions can be viewed <u>here</u>.

3. Legal basis for the processing of personal data

We only process your personal data, such as your surname and first name, your e-mail address and IP address, etc., if there is a legal basis for doing so. According to the General Data Protection Regulation, the following regulations in particular come into consideration here:



- Art. 6 para. 1 sentence 1 lit. a GDPR: The data subject has given their consent to the processing of their personal data for one or more specific purposes.
- Art. 6 para. 1 sentence 1 lit. b GDPR: Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
- Art. 6 para. 1 sentence 1 lit. c GDPR: Processing is necessary for compliance with a legal obligation to which the controller is subject.
- Art. 6 para. 1 sentence 1 lit. d GDPR: Processing is necessary in order to protect the vital interests of the data subject or of another natural person.
- Art. 6 para. 1 sentence 1 lit. e GDPR: the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.
- Art. 6 para. 1 sentence 1 lit. f GDPR: processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

However, we will always point out the legal basis on which your personal data is processed at the relevant points in this privacy policy.

4. Disclosure of personal data

The disclosure of personal data also constitutes processing within the meaning of section 3 above. However, we would like to take this opportunity to inform you separately about the issue of disclosure to third parties. The protection of your personal data is very important to us. For this reason, we are particularly careful when it comes to passing on your data to third parties.

Data is therefore only passed on to third parties if there is a legal basis for the processing. For example, we pass on personal data to persons or companies who work for us as processors in accordance with Art. 28 GDPR. A processor is anyone who processes personal data on our behalf - i.e. in particular in a relationship of instruction and control with us.

In accordance with the requirements of the GDPR, we conclude a contract with each of our processors to oblige them to comply with data protection regulations and thus ensure comprehensive protection of your data.

5. Storage period and deletion

Your personal data will be deleted by us if they are no longer necessary for the purposes for which they were collected or otherwise processed, if the processing is not necessary to exercise the right to freedom of expression and information, to fulfil a legal obligation, for reasons of public interest or to assert, exercise or defend legal claims.



6. SSL encryption

This web portal uses SSL encryption for security reasons and to protect the transmission of confidential content, such as the enquiries you send to us as the web portal operator. You can recognise an encrypted connection by the fact that the address line of the browser changes from "http://" to "https://" and by the lock symbol in your browser line.

If SSL encryption is activated, the data you transmit to us cannot be read by third parties.

7. Cookies

We use cookies on our website. Cookies are small data packets that your browser automatically creates and that are stored on your end device when you visit our website. These cookies are used to store information in connection with the end device used.

When cookies are used, a distinction is made between technically necessary cookies and "other" cookies. Technically necessary cookies are those that are absolutely necessary in order to provide an information society service that you have expressly requested.

a) <u>Technically necessary cookies</u>

In order to make the use of our website more pleasant for you, we use technically necessary cookies, which may be so-called session cookies (e.g. language and font selection, shopping basket, etc.), consent cookies, cookies to ensure server stability and security or similar. The legal basis for the cookies results from Art. 6 para. 1 sentence 1 lit. f) GDPR, our legitimate interest in the error-free operation of the website and the interest in providing you with our services in an optimised manner.

b) More cookies

Other cookies include cookies for statistical, analytical, marketing and retargeting purposes.

Further details can be found here.



8. Collection and storage of personal data and the nature and purpose of its use

a) When visiting the web portal

When you visit our web portal, the browser used on your device automatically sends information to the server of our web portal. This information is temporarily stored in a so-called log file. The following information is collected without any action on your part and stored until it is automatically deleted:

- Date and time of access
- Name and URL of the retrieved file
- the browser used and, if applicable, the operating system of your computer and the name of your access provider
- URL (e.g. GET https://portal.reev.com/dashboard)
- Time of request
- ClientIP
- TargetIP
- Processing time (time taken between request and response)
- Status code (e.g. was it successful, server caused error or client caused error)

We process the aforementioned data for the following purposes:

- Ensuring a smooth connection setup of the web portal
- Ensuring convenient use of our web portal
- · Evaluation of system security and stability
- Error analysis
- for further administrative purposes

Data that allows conclusions to be drawn about your person, such as the IP address, will be deleted after 14 days at the latest. If we store the data beyond this period, this data is pseudonymised so that it can no longer be associated with you. The legal basis for data processing is Art. 6 para. 1 sentence 1 lit. f GDPR. Our legitimate interest follows from the purposes for data collection listed above. Under no circumstances do we use the data collected for the purpose of drawing conclusions about your person.

b) Members/LogIn area

The login area is used to display the consumption and user data of the respective customer as part of the fulfilment of the contractual relationship in accordance with Art. 6 (1) GDPR.

para. 1 sentence 1 lit. b GDPR.

c) Forwarding of data when using online payment service providers

If you decide to pay with one of the online payment service providers we offer when using the web portal, your contact details will be transmitted to them as part of the order triggered in this way. The lawfulness of the transfer of the data is based on Art. 6 para. 1 sentence 1 lit. b GDPR, for the execution of the payment method you have chosen and our legitimate interests pursuant to Art. 6 para. 1 sentence 1 lit. f GDPR to enable user-



friendly and uncomplicated payment processing.

The personal data transmitted to the online payment service provider is usually first name, surname, address, e-mail address or other personal data required to process the invoice, as well as data related to the invoice, such as information on the charging process or location, invoice amount and taxes as a percentage, billing information, etc.

This transmission is necessary to process the loading processes of your drivers with the payment method you have selected.

Please note, however, that personal data may also be passed on by the online payment service provider to service providers, subcontractors or other affiliated companies if this is necessary to fulfil the contractual obligations arising from your order or if the personal data is to be processed on our behalf.

Depending on the selected payment method, e.g. invoice or direct debit, the personal data transmitted to the provider will be transmitted by the provider to credit agencies. This transmission serves to check your identity and creditworthiness in relation to the order you have placed. You can find out which credit agencies are involved here and which data is generally collected, processed, stored and passed on by the respective provider in the respective data protection declarations of the providers:

Stripe Payments Europe, Ltd, Grand Canal Street Lower, Grand Canal Dock, Dublin, Ireland, dpo@stripe.com, <u>https://stripe.com/de/privacy</u>

d) Contact form / e-mail contact

We provide you with a form on our web portal so that you have the opportunity to contact us at any time. To use the contact form, it is necessary to provide a name for a personal salutation and a valid e-mail address so that we know who sent the enquiry and can process it.

If you send us enquiries via the contact form, your details from the enquiry form, including the contact details you provide there and your IP address, will be processed in accordance with Art. 6 para. 1 sentence 1 lit. b and f GDPR to carry out pre-contractual measures in response to your enquiry or to safeguard our legitimate interests, namely to carry out our business activities.

You are also welcome to send us an e-mail using the e-mail address provided in our web portal instead. In this case, we will store and process your e-mail address and the information you provide in the e-mail in accordance with Art. 6 para. 1 sentence 1 lit. b and f GDPR to process your message.

The enquiries and the associated data will be deleted no later than 3 months after receipt, unless they are required for a further contractual relationship.



9. Analysis and tracking tools

We also use the analysis and tracking tools listed below in our dashboard. These serve to ensure the continuous optimisation of our dashboard and to design it in line with requirements.

a) PostHog

We use PostHog, a product analysis service, Inc, 2261 Market St., #4008, San Francisco, CA 94114, USA (hereinafter referred to as "PostHog") in our dashboard.

PostHog processes information about your use of this dashboard such as:

- Identification name, user name
- Computer device IP address, MAC address, browser footprint
- Contact e-mail address
- Location country, region, city
- Behaviour product usage (page views, clicks, browsing behaviour)

These are generally transmitted in encrypted form to a PostHog server in Frankfurt, Germany and stored there.

PostHog is also certified under the Data Privacy Framework Agreement (DPF) as part of the agreement between the EU and the USA.

PostHog will use this information on our behalf to analyse your use of our dashboard, to compile reports on dashboard activities and to provide us with further services associated with dashboard use and Internet use.

Please click <u>here</u> for an overview of data protection at PostHog.

b) Sentry

In our Dashboard, we use Sentry, an advertising analysis service from Functional Software, Inc, 45 Fremont Street, 8th Floor, San Francisco, CA 9410, USA (hereinafter "Sentry").

Sentry processes information about your use of this dashboard such as:

- Name and version of the browser used
- Operating system of your computer
- Website from which the access is made (referrer URL)
- Time of the server request

These are usually transmitted in encrypted form to a Sentry server in Frankfurt, Germany and stored there.

Sentry is also certified under the Data Privacy Framework Agreement (DPF) between the EU and the USA.



Via Sentry we have activated the functionality that your IP address is neither transmitted nor stored and shared, so that it is anonymised in our system.

Sentry will use this information on our behalf to analyse your use of our dashboard, to compile reports on dashboard activities and to provide us with further services associated with dashboard use and Internet use.

Please click <u>here</u> for an overview of data protection at Sentry.

10. Rights of the data subject

You have the following rights:

a) Information

In accordance with Art. 15 GDPR, you have the right to request information about your personal data processed by us. This right to information includes information about

- the purposes of processing
- the categories of personal data
- the recipients or categories of recipients to whom your data has been or will be disclosed
- the planned storage period or at least the criteria for determining the storage period
- the existence of a right to rectification, erasure, restriction of processing or objection
- the existence of a right to lodge a complaint with a supervisory authority
- the origin of your personal data if it was not collected by us
- the existence of automated decision-making, including profiling and, where applicable, meaningful information about its details
- b) <u>Correction</u>

According to Art. 16 GDPR, you have the right to immediate correction of incorrect or incomplete personal data stored by us.

c) Erasure

In accordance with Art. 17 GDPR, you have the right to demand that we erase your personal data without undue delay, unless further processing is necessary for one of the following reasons:

- the personal data are still necessary for the purposes for which they were collected or otherwise processed
- to exercise the right to freedom of expression and information
- for compliance with a legal obligation which requires processing by European Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller

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- for reasons of public interest in the area of public health pursuant to Art. 9 para. 2 lit. h and i and Art. 9 para. 3 GDPR
- for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Art. 89 para. 1 GDPR, insofar as the right referred to in section a) is likely to render impossible or seriously impair the achievement of the objectives of that processing
- for the assertion, exercise or defence of legal claims
- d) <u>Restriction of processing</u>

In accordance with Art. 18 GDPR, you can request the restriction of the processing of your personal data for one of the following reasons:

- You dispute the accuracy of your personal data.
- The processing is unlawful and you oppose the erasure of the personal data.
- We no longer need the personal data for the purposes of processing, but you need it for the establishment, exercise or defence of legal claims.
- You object to the processing pursuant to Art. 21 (1) GDPR.
- e) Information

If you have requested the rectification or erasure of your personal data or a restriction of processing in accordance with Art. 16, Art. 17 para. 1 and Art. 18 GDPR, we will inform all recipients to whom your personal data has been disclosed, unless this proves impossible or involves a disproportionate effort. You can request that we inform you of these recipients.

f) <u>Transmission</u>

You have the right to receive your personal data that you have provided to us in a structured, commonly used and machine-readable format.

You also have the right to request the transfer of this data to a third party, provided that the processing is carried out using automated procedures and is based on consent pursuant to Art. 6 para. 1 sentence 1 lit. a or Art. 9 para. 2 lit. a or on a contract pursuant to Art. 6 para. 1 sentence 1 lit. b GDPR.

g) <u>Revocation</u>

In accordance with Art. 7 (3) GDPR, you have the right to withdraw your consent to us at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. In future, we may no longer continue the data processing that was based on your revoked consent.

h) Complaint



In accordance with Art. 77 GDPR, you have the right to lodge a complaint with a supervisory authority if you believe that the processing of your personal data violates the GDPR.

i) <u>Objection</u>

If your personal data is processed on the basis of legitimate interests in accordance with Art. 6 para. 1 sentence 1 lit. f GDPR, you have the right to object to the processing of your personal data in accordance with Art. 21 GDPR, provided that there are reasons for this arising from your particular situation or the objection is directed against direct advertising. In the latter case, you have a general right to object, which will be implemented by us without specifying the particular situation.

If you wish to exercise your right of cancellation or objection, simply send an email to <u>info@reev.com</u>

j) Automated decision-making in individual cases including profiling

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you. This does not apply if the decision

- i. is necessary for the conclusion or fulfilment of a contract between you and us
- ii. is authorised by European Union or Member State law to which we are subject and which also lays down suitable measures to safeguard your rights and freedoms and legitimate interests
- iii. with your express consent

However, these decisions may not be based on special categories of personal data pursuant to Art. 9 para. 1 GDPR, unless Art. 9 para. 2 lit. a or g GDPR applies and appropriate measures have been taken to protect the rights and freedoms as well as your legitimate interests.

With regard to the cases referred to in i) and iii), we will take reasonable steps to safeguard your rights and freedoms and legitimate interests, including at least the right to obtain human intervention on our part, to express your point of view and to contest the decision.

11. Changes to the privacy policy

If we change the privacy policy, this will be indicated in the web portal at login or registered customers will be informed by e-mail.