

# Taoglas Privacy Notice

Taoglas respects your privacy and is committed to protecting your personal data. This Privacy Notice will inform you as to how we look after your personal data. We are a “B2B” company, meaning our customers are businesses and not consumers. When we use the word “you”, we are referring both to people who interact with us as individuals or representatives of our customers.

This Privacy Notice is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can download a pdf version of the policy [here](#).

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## 1. Important information and who we are

### 1.1 Purpose of this Privacy Notice

This privacy policy aims to give you information on how Taoglas collects and processes your personal data through your use of our websites (including Taoglas.com site, locate.taoglas.com, connect.taoglas.com site, crowdinsights.taoglas.com), when you sign up to our newsletter, use our products and services, speak to our staff, apply for a job with us or when you otherwise interact with us or provide us with personal information on you or individuals connected with you. Where necessary, we will provide additional information in relation to specific products and services.

It is important that you read this Privacy Notice, and any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Notice supplements the other notices and is not intended to override them.

### 1.2 Children

Our websites are not intended for children and we do not knowingly collect data relating to children. We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce this notice by instructing their children never to provide personal information through our websites. If you have reason to believe that a child has provided personal information to us through a Taoglas Site, please contact us at [privacy@taoglas.com](mailto:privacy@taoglas.com), and we will use commercially reasonable efforts to delete that information.

### **1.3 Controller**

This privacy policy is issued on behalf of Taoglas Limited and its affiliates (collectively in this privacy policy, "**Taoglas**", "**we**", "**us**" or "**our**"). Unless otherwise specified (for example, in relation to specific products or services or if you apply for a job with a member of our group), Taoglas Limited is the controller of your personal data.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your rights, please contact the data privacy manager using the details set out below.

If you have any questions about this Privacy Notice or information we hold about you, including any requests to exercise your legal rights, please contact us at [privacy@taoglas.com](mailto:privacy@taoglas.com) or write to us at Taoglas, DCU Alpha, Innovation Campus, Old Finglas Road, Glasnevin, Dublin 11, D11 KXN4.

You have the right to make a complaint to a data protection supervisory authority at any time. The Data Protection Commission ("**DPC**") is the Irish supervisory authority and can be contacted at [info@dataprotection.ie](mailto:info@dataprotection.ie). We would, however, appreciate the chance to deal with your concerns before you approach the DPC or another data protection supervisory authority so please contact us in the first instance.

### **1.4 Changes to this Privacy Notice**

We keep our Privacy Notice under regular review and we will place any updates on this web page. We advise you to review this page regularly to stay informed and to make sure that you are happy with any changes. If we make material changes to this Privacy Notice we will notify our registered users by email or through posting a notification when you log into our products or services. This Privacy Notice was last updated on 1<sup>st</sup> October 2021 and is published in accordance with the requirements of the General Data Protection Regulation (EU) 2016/679 ("**GDPR**").

### **1.5 Your personal data**

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us. If you are a representative of one of our customers and have account access credentials, you can always access the account and review the information you have provided, including name, address, email address, phone number, payment information and other relevant account information. You can update this information directly or contact us for assistance. If you delete some or all of this information, then you may be prevented from accessing your account or using any services. Data relating to device activity and to actions that have

been authorized by an account representative regarding those devices that is intended for viewing by customers may be accessed at our customer portal.

## 1.6 Third-party links

Our websites, products and services may contain links to websites operated by third parties that we believe may be of interest or that are relevant to one of our services. If you use these links, you will leave our site, and you should note that we do not have any control over that other websites and cannot be responsible for the protection and privacy of any information that you provide while visiting such sites. Providing a link to third party websites does not mean that we endorse or warrant the products or services provided by any third parties and this Privacy Policy does not govern such sites. These third parties and the social media providers described earlier will have their own privacy policies that will govern the data they collect.

## 1.7 Taoglas as Processor

While providing services to customers, we collect information that we believe is not personal data including device IDs, time stamps, authentication records, location information, carrier service used, signal strength, the origin, destination, type and quantity of traffic passed and other operational data. For example, as part of analytic services provided to our customers, Taoglas identifies the following information based on mobile devices; MAC address of device, time device seen, estimated location of device and sometimes RSSI. Once identified, this device MAC address is immediately converted into a unique 'CROWD Insights ID' using a non-reversible hash. The CROWD Insights ID is stored and the device MAC address discarded. We require this information to present aggregated information of the venue or city to our customers. This in turn enables them to deliver better, more secure services. If we reasonably determine that any device data could reveal information about an identifiable natural person, such as their location, we will protect it as we would any other personal data. Where we are engaged as a processor on behalf of our customers (such as customers using our analytic services CROWD Insights), you should refer to our customer's privacy notice.

## 2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

**Identity Data** including first name, maiden name, last name, username or similar identifier, job title/position, date of birth and gender.

**Contact Data** including employer, work address, email address and telephone numbers.

**Financial Data** including transaction amount, payment method and cardholder details.

**Technical Data** including internet protocol (IP) address, device identifier, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our websites, products and services.

**Usage Data** including information about how you use our websites, products and services such as your geographical location, your Internet service provider and your IP address. We also record information about the software you are using to browse our websites, such as the type of computer or device and the screen resolution.

**Marketing and Communications Data** including your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law where you are directly or indirectly identified or identifiable. For example, we may aggregate your usage Data to calculate the percentage of users accessing a specific service feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Notice.

Unless required by law, we will not, without your explicit consent, collect **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data) or information about criminal convictions and offences. If you believe any Taoglas Site or Taoglas employee has asked you for this information, please contact us at [privacy@taoglas.com](mailto:privacy@taoglas.com).

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you or your employer and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you or your employer.

## **3. How is your personal data collected?**

We use different methods to collect data from and about you including through:

**Direct interactions.** You may give us your Identity and Contact Data filling in forms or by corresponding with us by post, phone, email, or otherwise. This includes personal data you provide when you:

- subscribe to our services, newsletters or mailing lists;
- attend our webinars;
- request information to be sent to you including viewing demos;
- enter a survey;
- apply for a job in our “Careers” section;
- give us some feedback; or
- submit a query.

**Automated technologies or interactions.** As you interact with our websites, products and services, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy (<https://www.taoglas.com/eu-legislation-on-cookies/>) for further details.

**Third parties or publicly available sources.** We may receive personal data about you from various third parties, including Identity and Contact Data from your employer and/or publicly available sources like the Companies Registration Office in Ireland and Technical Data from analytics providers/advertising networks and search information providers such as Google.

#### 4. How we use your personal data

We will only use your personal data when the law allows us to. We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us at [privacy@taoglas.com](mailto:privacy@taoglas.com) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

**Consent.** Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. Where we rely on your consent to process your personal data, you have the right to withdraw your consent at any time, although in certain cases we may not be able to continue to provide services to you (or your employer) if we cannot use the personal data. You have the right to withdraw consent at any time by contacting us at [privacy@taoglas.com](mailto:privacy@taoglas.com).

**Legitimate Interests.** Where we rely on legitimate interests as our lawful basis we make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Purpose/Activity	Processing Operation	Type of Data	Lawful basis for processing including basis of legitimate interest
<p>To operate our business including:</p> <p>(a) Providing our products or services to you (or a third party), administering subscriptions and relevant information to you in connection with our websites, products or services including transaction receipts, security alerts and support messages</p> <p>(b) Manage payments, fees and charges</p>	<p>Collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.</p>	<p>(a) Identity            (b) Contact            (c) Financial            (d) Transaction            (e) Marketing and Communications</p>	<p>Necessary for our legitimate interests to enter into, perform and enforce our contracts with our customers.</p>

(c) Collect and recover money owed to us			
To register you as a new customer or authorised user of one of our customers		(a) Identity (b) Contact	Necessary for our legitimate interests to enter into, perform and enforce our contracts with our customers.
To manage our relationship with you and our customers which will include:  (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey (c) Responding to emails or messages you have sent us which are reasonable to expect a reply to (d) Responding to complaints made by you about our websites, products or services (e) Asking you to leave a review or take a survey; (f) Other activities necessary for the maintenance of our relationship with you.		(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	Necessary to comply with a legal obligation.
To administer and protect our business, our websites, our products and services (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) and the safety of our staff, customers and others		(a) Identity (b) Contact (c) Technical	Necessary for our legitimate interests to administer our business including (i) the provision of administration and IT services, network security, (ii) measures designed to prevent fraud and (iii) in the context of a business reorganization or group restructuring exercise).  Necessary to comply with a legal obligation.
To customising your interaction with our websites, services and products according to your		(a) Identity (b) Contact (c) Profile (d) Usage	Necessary for our legitimate interests to study how customers use our products/services, to develop them, to grow our business

<p>customer status and your interests, deliver relevant content and advertisements to you and measure or understand the effectiveness of the content and advertising we serve to you</p>		<p>(e) Marketing and Communications (f) Technical</p>	<p>and to inform our marketing strategy.</p>
<p>To use data analytics to develop, maintain and improve our websites, products/services, marketing, customer relationships and experiences including analysing log and device data to understand how our services are operating, how to maintain and improve them and to determine if there is information about patterns, correlations and trends that may be useful to us or to our customers or partners, sharing results of our analysis or aggregated data containing de-identified information with third parties who use it for such purposes as industry analysis and demographic profiling. We may also sell products or services that incorporate or are based on results of our analysis, or this aggregated information that has been de-identified.</p>		<p>(a) Technical (b) Usage</p>	<p>Necessary for our legitimate interests to define types of customers for our products and services, to keep our websites updated and relevant, to develop our business and to inform our marketing strategy.</p>
<p>To communicate with you about news and updates to our websites, products, and services and to inform you about any promotions, incentives and rewards offered by us and/or our partners.</p>		<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical</p>	<p>Necessary for our legitimate interests to develop our products/services and grow our business including promoting our activities, supporting our marketing strategy and sending you marketing materials, noting that you have the right to object to such marketing communications at any time.</p> <p>You have, as appropriate, provided consent (which may be withdrawn at any time) or not opted out.</p>

<p>To comply with valid legal requirements such as a law, regulation, search warrant, subpoena, or court order; or in response to a physical threat to you or others, to protect property or defend or assert legal rights.</p>		<p>(a) Identity (b) Contact (c) Profile (d) Financial (e) Usage (f) Marketing and Communications (g) Technical</p>	<p>Necessary for our legitimate interests for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise.</p> <p>Necessary to comply with a legal obligation.</p>
<p>To consider any job applications</p>		<p>(a) Identity (b) Contact (c) Profile (d) Financial</p>	<p>Necessary for our legitimate interests in evaluating your candidacy including, if applicable, carrying our reference and background checks.</p>

### Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at [privacy@taoglas.com](mailto:privacy@taoglas.com).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 5. Disclosures of your personal data

**Access by Taoglas Personnel.** We allow access to personal data only to those of our employees, and consultants who have a need to access the information for a lawful purpose. We train our employees how to appropriately handle personal data and require that consultants do likewise.

**Access by other third parties.** We may store your information with or allow access to your information to third parties who provide us with certain services, including websites maintenance, database and cloud, customer support, customer analytics, payment processing, payroll and benefits management or other services. Our contracts with these third party providers only allow use of your information to provide these services and require that they not disclose it unless required in certain situations, like those described in the following paragraph. We review the security policies and practices of our third party service providers as appropriate as part of our own efforts to maintain the security of your information.

**Law Enforcement, Court Orders and Protection of Our Rights.** We may disclose any of your information to government officials as necessary to comply with applicable laws and orders. If we receive a request to disclose any such information,



we may do so if we believe in our reasonable discretion that such request is lawful and that disclosure is reasonably necessary to comply. We may also disclose your personal data to respond to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims. In the event that we are legally compelled to disclose your personally identifiable information to a third party, we will attempt to notify you unless doing so would violate the law, court order or government instruction.

**Other Disclosures.** We may also disclose your information if we believe it is necessary in order to protect our property rights or rights of a third party, to protect the safety of any person or of the public or to prevent any activity that we believe is harmful, illegal or unethical. For example, we may need to use personal data in order to enforce our terms of service with customers and our workplace rules, or to engage in other business or corporate transactions. We will put in place appropriate security measures, such as non-disclosure agreements, whenever possible.

## 6. International transfers

We choose a location storage depending on the type of data:

**Website and Account Information.** Our websites are hosted in the EU. If you are located outside the EU, such as in the US, and interact with Taoglas sites, including when you manage any account, you are effectively “visiting” an EU website, and the data that you provide is stored in the EU.

**Marketing Information.** If you share your information with a Taoglas sales or marketing representative, your data is generally kept in the region where you are located or where the contact (such as a tradeshow or event) took place (e.g., US, EU, APAC). We use a CRM service to help us manage our marketing and financial activities, and some of your personal data may be kept on systems in the US. In addition, our staff do share limited information, which may include your contact information, to coordinate marketing activities and to make sure that you are interacting with the correct Taoglas entity and business function, such as finance, legal, support or engineering.

**Data Relevant to Employment** If you apply for a position with any Taoglas company, generally, your information will stay in the country where you apply, although some data may be shared with other Taoglas companies especially for global positions.

The Taoglas group companies are entering into formal agreements based on “standard contractual clauses” that commit us to following the principles in the first part of this Privacy Notice when one Taoglas company transfers personal data to another. Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the European Economic Area.

## 7. Data security

**Security:** Data is at the heart of an IoT business, whether it is personal data or non-personal data. We use industry-standard measures to safeguard all data and have a continuous process in place to test the effectiveness of these measures and to review the threat landscape and new tools available. You have a role to play in security as well, and we ask that you use prudent measures to protect against unauthorized access to your account information, including logging out of your account when finished, not sharing your login information and taking other customary security precautions appropriate for the situation. The type of organizational or technical measures we use to secure our systems

and data may differ depending on the sensitivity of the data and our assessment of how accidental or unauthorized disclosure or use of the data could threaten the rights and freedoms of natural persons. If we become aware that the security of any of the personal information that we store or that is stored by our third party service providers has been compromised, we will comply with all applicable laws, including promptly notifying you if required by law.

**Contents of Cellular Transmissions.** The contents of any SMS, data or voice transmissions made by customer devices over cellular networks are not accessed, viewed or stored by Taoglas. These transmissions are made using standards-based security processes applicable to all cellular operators

**Data in Transit.** Any traffic sent by or to a device using cellular networks is protected in accordance with cellular security standards, including in most cases encryption. Any data sent over the Internet is not necessarily secure unless it has been encrypted during transit or is sent over a secure channel, such as a VPN. A Taoglas representative will be pleased to discuss when and whether a VPN is appropriate.

**Phishing.** We are aware that there are people who may pose as legitimate businesses and try to trick you into disclosing personal information that can be used to steal your identity. We will not request your account login or password, your credit card information or any sensitive data that could be used to steal your identity, such as national identifying numbers, in an unsolicited or non-secure email or telephone call. If you believe that someone representing themselves as being associated with Taoglas has requested this information in a contact that you did not request or initiate, please contact us immediately at [security@taoglas.com](mailto:security@taoglas.com) so that we may verify the identity of the person contacting you and the validity of the request.

**Special Laws.** If you pay us by credit card, we and our payment processors protect your payment information in accordance with local laws establishing standards for payment card information. Unless we agree otherwise, however, the data security measures we take are not designed to comply with other laws applicable to specific types of businesses, such as the Health Insurance Portability and Accountability Act (HIPAA). Please contact us if you need more information about this.

## 8. Data retention

We and our third party processors will keep personal data in our active operating systems only for as long as necessary to fulfil the purposes we collected it for, including for the purposes of providing services to you or a customer, satisfying any legal, accounting, or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

We keep basic information about our customers (including Contact and Identity Data of our customers' representatives) for six years after our relationship with them ceases for tax and other legal purposes. If you send us information in connection with a job application, we may keep it for up to three years in case we decide to contact you at a later date. Thereafter, we and our duly authorised delegates will refrain from collecting any further personal data on you and shall

take appropriate steps to dispose of any records containing your personal data, to the extent this is operationally feasible and proportionate. We reserve the right to delete and destroy all of the information collected about you in accordance with our retention policies unless otherwise required by law.

## 9. Your legal rights

Under certain circumstances, you have the following rights under data protection laws in relation to your personal data:

**Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Opting out:** You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at [marketing-optout@taoglas.com](mailto:marketing-optout@taoglas.com) any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

**Request restriction** of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

If you want us to establish the data’s accuracy.

Where our use of the data is unlawful but you do not want us to erase it.

Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.

You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer of your personal data to you or to a third party.** We will provide to you, or a third party you have

chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

**Contact Us** If you would like to exercise any of the above rights, please contact us at [privacy@taoglas.com](mailto:privacy@taoglas.com) with your request. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response. We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

*Last updated: Aug 2023*