

# Clarotech Data Policy

PLEASE READ THIS DATA POLICY CAREFULLY BEFORE USING THIS WEBSITE or SUBSCRIBING FOR ANY CLAROTECH SERVICE(S)

## Who we are and what this policy does

Claro Logistics Applications Ltd trading as Clarotech (**We**).

We are a limited company registered in Ireland with company number 647601 and have our registered office at 40 Fitzwilliam Square West, Dublin 2. Our main trading address is 40 Fitzwilliam Square West, Dublin 2. We operate the website [www.clarotech.io](http://www.clarotech.io) and Portal (**Website**).

We provide a web based service that connects 4G mobile network devices to a database (the **Service**) via a web based portal (**Portal**) in order to upload data to

- record and manage work dockets associated with the regulated activity of transporting waste to registered / permitted waste reception facilities (**eDockets**)
- record and manage regulatory checks required to be performed and recorded on commercial vehicles (**VehicleCheck**)

To contact us use the details on the "Contact Us" section of the Website

This Policy describes the information we process to support our products and other products and features offered by Clarotech (**Clarotech Services**).

## What kinds of information do we collect?

To provide the Clarotech Services, we must collect and process information about you. The type of information that we collect depends on how you use our Services.

Things that you and others do and provide.

### Information and content you provide.

We may collect the content, communications and other information you provide when you use our Services, including when you sign up for an account, create or share content and message or communicate with others. This can include information in or about the content that you provide (e.g. metadata), such as the location of a device or the date a file was created or updated. It can also include what you see through features that we provide. Our systems may automatically process content and communications that you and others provide to analyse context and what's in them for the purposes described below.

### Data with special protections:

We do not collect information about your religious views, political views, health, who you are "interested in" or life events. This and other information (such as racial or ethnic origin, philosophical beliefs or trade union membership) is subject to special protections under EU law.

Your usage.

We may collect information about how you use our Services, such as

- the features you use,
- the actions you take,
- the data you upload
- the people or accounts you interact with
- the location, time, frequency and duration of your activities.
- the types of content that you view or engage with,

For example, we log when you're using and have last used our Services, and what posts, uploads and other content you use on our Services. We may also collect information about how you use Service features.

Information about transactions made on, via or in association with our Services.

We may collect information about all financial transaction that involve our Services. This includes payment information, such as your credit or debit card number and other card information, other account and authentication information, and billing, counterparty and contact details.

Things others do and information they provide about you.

We may also receive and analyse content, communications and information that other users provide when they use our Services. This can include information about you and/or your company.

Device information.

As described below, we may collect information from and about the computers, phones, and other web-connected devices you use with our Services, and we may combine this information across different devices that you use.

Information that we may obtain from these devices includes:

- **Device attributes:**  
information such as the operating system, hardware and software versions, battery level, signal strength, available storage space, browser type, app and file names and types, and plugins.
- **Device operations:**  
information about operations and behaviours performed on the device, such as whether a window is in the foreground or background, or mouse movements (which can help distinguish humans from bots).
- **Identifiers:**  
unique identifiers, device IDs and other identifiers, such as from apps or accounts that you use, and company/employer Device IDs (or other identifiers unique to Clarotech Company Services associated with the same device or account).
- **Device signals:**  
Bluetooth signals, information about nearby Wi-Fi access points, beacons and mobile phone masts.
- **Data from device settings:**  
information you allow us to receive through device settings that you turn on or permissions that you enable, such as access to your GPS location, camera or photos.
- **Network and connections:**  
information such as the name of your mobile operator or ISP, language, time zone, mobile phone number, IP address, connection speed and, in some cases, information about other devices that are nearby or on your network.
- **Cookie data:**  
data from cookies stored on your device, including cookie IDs and settings.

#### Information from partners.

In the future, advertisers, app developers and public bodies may send us information through Clarotech tools that they use, including our planned application programming interfaces (API's) and software development kits (SDK's). These partners may provide information about your activities outside your Clarotech usage – including information about your device, – whether or not you have a Clarotech account or are logged in to Clarotech. We may also receive information about your online and offline actions and purchases from third-parties who have the rights to provide us with your information.

Partners receive your data when you visit or use their services, or through third parties that they work with. We require each of these partners to have lawful rights to collect, use and share your data before providing us with any data.

#### **How do we use this information?**

We may use the information that we have as described below, and to provide and support the Clarotech Services and related services described in the Clarotech Terms.

#### Provide, personalise and improve our Services.

We use the information we have to deliver our Services, including to personalise features and content and make suggestions for you on and off our Services. To enable personalised Services that are unique and relevant to you, we use your connections, preferences, interests and activities based on the data that we collect and learn from you and others (including any data with special protections that you choose to provide where you have given your explicit consent);

#### Information across Clarotech Services and devices:

We may connect information about your activities on different Clarotech Services and devices to provide a more tailored and consistent experience on all Clarotech Services that you use, wherever you use them.

We can also make your experience more seamless, for example, by automatically filling in your registration information (such as your phone number) from one Clarotech Service when you sign up for an account on a different Service.

#### Location-related information:

We may use location-related information – such as your current location, where you work, the places you go, and the businesses and people you're near – to provide, and improve our Services, including ads, for you and others. Location-related information can be based on things such as precise device location (which you've allowed us to collect), IP addresses and information from your and others' use of Clarotech Services.

#### Service research and development:

We use the information we have to develop, test and improve our Services, including by conducting surveys and research, and testing and troubleshooting new products and features.

#### Bio-metric recognition:

If you have it turned on, we may in the future use bio-metric recognition technology to provide secure login facilities. The templates that we may create may be defined as data with special protections under EU law.

#### Ads and other sponsored content:

We may use the information we have about you – including information about your actions and locations – to select and personalise ads, offers and other sponsored content that we may show you.

#### Providing measurement, analytics and other business services.

We may use the information we have (including your activity off our Services, such as the locations you visit) to help advertisers, regulators and other partners measure the effectiveness and distribution of their ads and services, and understand the how people use and interact with their services.

#### Promote safety, integrity and security.

We may use the information that we have to verify accounts and activity, combat harmful conduct, detect and prevent spam and other bad experiences, maintain the integrity of our Services, and promote safety and security on and off Clarotech Services. For example, we use data that we have to investigate suspicious activity or breaches of our Terms or Policies, or to detect when someone needs help.

#### Communicate with you.

We may use information that we have sent to you to communicate with you about our Services and let you know about our Policies and Terms or changes to them. We may also use your information to respond to you when you contact us.

#### Research and innovate for social purposes.

We may use the information we have (including from research partners we collaborate with) to conduct and support research and innovation on topics of general social welfare, technological advancement, public interest, health and well-being.

### **How is this information shared?**

Your information may be shared with others in the following ways:

#### Information about your active status or presence on our Services.

Clarotech clients may be able to see signals or indicators telling them whether you are active on our Services, including whether you are currently active on Clarotech, or when you last used our Services.

#### Apps, websites and third-party integrations on or using our Services.

When you choose to use third-party apps, websites or other services that use, or are integrated with, our Services, they can receive information about what you post or share.

Apps and websites that you use may receive your list of Clarotech contacts (if you choose to share it with them). These apps and websites will not be able to receive any other information about your Clarotech contacts from you. Information collected by these third-party services is subject to their own terms and policies, not this one.

In the future, if devices and operating systems provide native versions of Clarotech (i.e. where we have not developed our own first-party apps), they will have access to all information that you choose to share with them, including information that your contacts share with you, so they can provide our core functionality to you.

#### New owner.

If the ownership or control of all or part of our Services or their assets changes, we may transfer your information to the new owner.

### **Sharing with third-party partners**

We work with third-party partners who help us provide and improve our Services or who use Clarotech Tools to grow their businesses, which makes it possible for us to operate. We reserve the right to sell some or all of the data we collect about you to these third parties. We may impose restrictions on how our partners can use and disclose the data we provide.

Here are the types of third parties that we may share or sell information with/to:

#### Partners who use our analytics services.

We may provide aggregated and/or anonymised statistics and insights that help people and businesses understand how people are engaging with the Clarotech Services.

#### Advertisers / Vendors

We may provide advertisers and/or product vendors with reports about the profile of people seeing their ads and how their ads are performing, but we don't share information that personally identifies you (information such as your name or email address that by itself can be used to contact you or identifies who you are) unless you give us permission.

We may also confirm which Clarotech ads led you to make a purchase or take an action with an advertiser.

Measurement partners.

We may share information about you with companies that aggregate it to provide analytics and measurement reports to our partners.

Partners offering goods and services in or via our Services.

When you subscribe to receive premium service, or buy something from a vendor via our Services, the content creator or seller can receive your public information and other information that you share with them, as well as the information needed to complete the transaction, including shipping and contact details.

Vendors and service providers.

We may provide information and content to vendors and service providers who support our business, such as by providing technical infrastructure services, analysing how our Services are used, providing customer service, facilitating payments or conducting surveys.

Researchers and academics.

We may provide information and content to research partners and academics to conduct research that advances scholarship and innovation that supports our business or mission and enhances discovery and innovation on topics of general social welfare, technological advancement, public interest, health and well-being.

Local Authority enforcement, law enforcement or legal requests.

We may share information with local authorities, law enforcement or in response to legal requests in the circumstances outlined below.

### **How do the Clarotech Companies work together?**

Clarotech may, in the future, share infrastructure, systems and technology with other Clarotech Companies to provide an innovative, relevant, consistent and safe experience across all Clarotech Company Services that you use. We may also process information about you across the Clarotech Companies for these purposes, as permitted by applicable law and in accordance with their Terms and Policies.

We also work to understand how people use and interact with Clarotech Company Services, (such as understanding the number of unique users on different Clarotech Company Services).

### **What is our legal basis for processing data?**

We collect, use and share the data that we have in the ways described above:

- as necessary to fulfil our Clarotech Terms of Service;
- consistent with your consent, which you may revoke at any time through contacting us by using the details on the "Contact Us" section of the Website;
- as necessary to comply with our legal and regulatory obligations;
- to protect your vital interests, or those of others
- as necessary in the public interest and
- as necessary for our (or others') legitimate interests, including our interests in providing an innovative, personalised, safe and profitable Service to our users and partners, unless those interests are overridden by your fundamental rights and freedoms that require protection of personal data.

### **How can you exercise your rights provided under the GDPR?**

Under the General Data Protection Regulation, you have the right to access, rectify, port and erase personal data that We hold and store on our Service.

You also have the right to object to and restrict certain processing of your data. This includes:

- the right to object to our processing of your personal data for direct marketing, which you can exercise by using the "unsubscribe" link in such marketing communications, and
- the right to object to our processing of your personal data where we are performing a task in the public interest or pursuing our legitimate interests or those of a third party.

You can exercise this right by contacting the Clarotech Data Protection Officer.

### **Account deactivation, deletion and Data retention,**

We store data until it is no longer necessary to provide our Services or until your account is deleted – whichever comes first, subject to any and all regulatory and legal requirements for data storage associated with activities undertaken via the Clarotech products.

This is a case-by-case determination that depends on things such as the nature of the data, why it is collected and processed, and relevant regulatory, legal or operational retention needs.

For example, when you search for something on Clarotech, you can access and delete that query from within your search history at any time, but the log of that search is deleted after twelve months. If you submit a copy of your government-issued ID for account verification purposes, we may delete that copy 30 days after review, unless otherwise stated.

When you delete your account, you will not be able to access this information later. Information that others have shared about you isn't part of your account and won't be deleted.

If you don't want to delete your account but want to temporarily stop using the Services, you can deactivate your account instead.

To delete your account at any time, please contact us by using the details on the "Contact Us" section of the Website.

### **How do we respond to legal requests or prevent harm?**

We access, preserve and may share or sell your information with regulators, law enforcement or others:

- In response to a legal request, if we have a good-faith belief that the law requires us to do so. We may also respond to legal requests when we have a good-faith belief that the response is required by law in that jurisdiction.
- When we have a good-faith belief that it is necessary to:
  - detect, prevent and address fraud, unauthorised use of the Services, breaches of our Terms or Policies, or other harmful or illegal activity;
  - to protect ourselves (including our rights, property or Services), you or others, including as part of investigations or regulatory enquiries; or
  - to prevent death or imminent bodily harm.

Information we receive, collect and hold about you (including financial transaction data related to purchases made with or in association with Clarotech products) can be accessed and preserved for an extended period when it is the subject of a regulatory or legal request or obligation, governmental investigation or investigations of possible violations of our terms or policies, or otherwise to prevent harm. We also retain information from accounts disabled for breaches of Terms, or deleted, for at least a year.

### **How will we notify you of changes to this Policy?**

We'll notify you via the Clarotech website and/or Service app before we make changes to this Policy and give you the opportunity to review the revised Policy before you choose to continue using our Services.

### **How to contact Clarotech with questions**

If you have questions about this Policy, you can contact us as described below.

The data controller responsible for your information is Clarotech Data Protection Officer, which you can contact on-line or by writing to:

Data Protection Officer  
Clarotech  
40 Fitzwilliam Square West,  
Dublin 2  
Ireland

You also have the right to lodge a complaint with Clarotech supervisory authority, the Irish Data Protection Commissioner.

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Date of last revision of this Policy  
12<sup>th</sup> July 2021