

PRIVACY POLICY

THE MIWIRE PRIVACY POLICY WAS UPDATED ON AUGUST 26.08.2019

Introduction. It is important to us that you feel safe in conducting business and interacting with MiWire ApS. To this end, it is crucial for you to understand what personal information ("**data**") we collect, store and process. We thus have this clear and fair Privacy Policy ("**Policy**"). Please know that we handle your data in compliance with EU Regulation 2016/679 ("**GDPR**").¹

Data Controller. MiWire ApS, a Danish private limited company, is the data controller, and it is we, MiWire, who collect, store and process the data. We are also responsible for handling any questions you might have in connection with data that concerns you.

CONTACT INFORMATION:

MiWire ApS
Nordre Strandvej 119 C, 2.
3150 Hellebæk, Denmark

Danish company reg. (CVR) no: 38139029
Phone: +45 21 26 23 80
E-mail: customerservice@miwire.net

Your age. Guardianship. As part of this Policy, you confirm that you are at least sixteen (16) years of age and not under guardianship or that you have ensured your custodians' or guardians' express consent to this Policy.

Legal Basis. Under GDPR article 6, our legal basis for processing your data is:

- Contract. We have established that it is necessary to process the data for purposes of fulfilling our contract with you, in particular our obligation to navigate, optimise, service and update our MiWire RouDem and related services ("Product");
- Consent. Prior to using our product or other services, we have procured your voluntary and informed consent to the processing in question;
- Legitimate Interest. We have established that it is necessary to process the data to allow us to pursue a legitimate interest that fully respects your fundamental rights and freedoms, namely to allow us to generally optimise our product and other products and/or services.

Data Collected and Processed. We collect and process the following types of data: Personal information that you provide us. For example, this can include your name, MiWire IMEI number, address, country, e-mail, phone number and other contact information.

Information about use of the product. Specifically, this is the product's geographical position, which network it utilises and its signal strength, conditions of the product (e.g. temperature), irregularities (e.g. incidents that have the characteristics of hacking), and events that require servicing.

¹Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

- i. Personal information that you provide us. For example, this can include your name, MiWire IMEI number, address, country, e-mail, phone number and other contact information.
- ii. Information about use of the product. Specifically, this is the product's geographical position, which network it utilises and its signal strength, conditions of the product (e.g. temperature), irregularities (e.g. incidents that have the characteristics of hacking), and events that require servicing.

Facebook Pixel. This cookie collects data about your actions on our website and compares that data with your Facebook and Instagram profile (which is owned by Facebook). The Facebook Pixel helps MiWire ApS with optimizing our social media marketing. MiWire ApS has access to fully anonymized statistics only through Facebook Pixel

Purpose of Data. The purpose of collecting, storing and processing your data lies in:

- Allowing our product to navigate, calibrate and direct itself in order to obtain the best possible signal. To do this, we have equipped the product with a GPS unit and software that tells us where the product is located geographically which then allows our system to remotely direct it towards the nearest or best broadcast tower and otherwise optimise the individual product.
- Allowing us to service, update and optimise the product remotely. To do this, we have equipped the product with a GPS unit and software that tells us where the product is located geographically, which network it is utilising and if any event makes servicing relevant.
- Allowing us to contact you directly concerning matters pertaining to the product (including this Policy). We may be able to provide you with alerts and assistance concerning hacking, theft and other irregularities pertaining to the product. To do this, our system communicates with the product and we may then be able to alert and assist you via the contact information that you provide us. We may also be able to assist you if you lose or forget your chosen password for the product. In some cases, we may be able to assist you with utilising the product better by contacting you based on the information that our system gathers.
- To fulfil our contractual obligations with you and, if you so requested, to provide you information about our business, products or services (e.g. via newsletter).
- To generate statistics, reports and conduct data mining where the end result is in an anonymous format.

Other Sources of Data. We may also receive such data as pertains to you from other sources. When we receive data from other sources, we will ensure that our intended use of such data is in accordance with the purposes for which they were collected by the other source(s) and, if this is not the case or cannot reasonably be determined, firstly provide you with necessary information and the opportunity to object.

Excluded Data. We will not collect data on race, ethnicity, political views, religious views, philosophical views, union relations, sexual relations or preferences, biometry, genetics, health records, criminal records or severe social problems, unless you choose to actively provide such data, in which case we will not make use of or transfer such data. Further, we want to make it clear that we will not collect data on your internet browsing history or similar use of the product unless you choose to actively provide such data, in which case we will not make use of or transfer such data.

Responsible Data. To protect your data, we will responsibly and continuously evaluate and monitor for risks to your fundamental rights connected to our collection, storage and processing of your data. We will especially take into account any risks that you could be discriminated against, become the victim of identity theft, suffer economic or reputational losses, and breach of data confidentiality.

Storage Time. The data mentioned will generally be stored for five (5) years or as prescribed by applicable law. If data is relevant or necessary for purposes of your ongoing use of the product, the data will generally be stored for five (5) years after your last use of the product. We will delete or make your data anonymous no later than at the end of the mentioned period. We may also do so at an earlier time if we deem that the retention of the data in a non-anonymous form no longer complies with the purpose(s) for which it was collected.

Anonymous Data. The Policy does not cover data rendered anonymous. If data rendered anonymous become no longer anonymous (i.e. individuals are again identifiable), then this Policy shall apply.

Incorrect Data. If we become aware that data is incorrect or misleading, we will delete or amend the data.

Direct Marketing. We will not use your data for direct marketing purposes unless you have actively requested that we use the data for such purposes. Also, we will not disclose your data to third parties for the purpose of allowing them to market their products or services to you.

Automated Decision-Making. Profiling. We will not use your data for automated decision-making (including profiling) unless you have actively requested that we use the data for such purposes. Also, we will not disclose your data to third parties for the purpose of allowing them to conduct automated decision-making (including profiling).

Your Rights. You have all the rights afforded to you under the law, including:

- **Insight.** You are entitled to be informed about what data we process. However, access to the data may be limited due to other persons' privacy rights and due to confidentiality concerning intellectual property rights (including trade secrets).
- **Correction.** You are entitled to demand amendments or deletion of data that is incorrect or misleading.
- **Objection.** You can object to us processing data and you can withdraw your consent pursuant to this Policy if consent is the basis for the collection and processing.
- **Limiting.** You can in certain instances limit our processing of data. If this is the case, we may only process such data with your consent; or to determine, make or defend a legal claim; or to protect another person or vital social interests.
- **Deletion.** You can demand that your data is deleted without undue delay if the purpose for which the data is being processed is no longer legal or appropriate.
- **Objection to transfer.** You are entitled to object against your data being transferred to third parties.
- **Receipt and transmission.** You are entitled to receive your data in a structured, commonly used and machine-readable format and have the right to transmit that data to another controller. If technically feasible, you can ask that the data be transferred directly to another data controller.
- **Compensation.** You are entitled to be compensated for damages or losses caused due to violation of applicable law, in particular of the GDPR.
- **More information.** You can find more information on your rights under the law on the webpage of the Danish Data Protection Agency: www.datatilsynet.dk.

Application of Rights. You may apply your rights by contacting us as provided herein. However, use of the product and provision of data to us is voluntary, and if you object to us gathering and processing your data or demand the deletion of all or a substantial amount of your data, we might not be able to, or may refuse to, continue providing the services associated with the product and

the product may not function properly.

Recipients of Data in the EU. In accordance with this Policy and applicable law, we may transfer and disclose data to the following recipients within the European Union: Public authorities, our business partners and associates, other companies in our company group, our customers, suppliers and contractors. If and before we transfers any data pertaining to you, we will check whether you have asked that your data not be transferred to any third party. We will also ensure that necessary safety requirements are in place for such transfers.

Transfer of Data to Third Countries. We will not transfer data to persons or entities outside of the European Union unless legally compelled to do so.

Security Measures. We provide physical, electronic, and procedural safeguards to protect the data we collect and process. When communicating data electronically, we will encrypt such data.

Later Changes to Policy. We may, at our sole discretion, make changes to the Policy. If we consider any such changes as material, you will receive prior notice of such changes and may need to accept such changes for continued business and interaction with us.

Complaints. Apart from complaining directly to us, you are also entitled to complain to the Danish Data Protection Agency ("Datatilsynet"). You can do so online via their homepage (www.datatilsynet.dk) or you can write to the Agency:

Datatilsynet
Borgergade 28, 5.
1300 Copenhagen K
Denmark

If you are residing or working in another EU member state or believe that a violation of your rights has taken place outside of Denmark, you may also file a complaint with the local data protection agency at a relevant location.

Notice to persons outside of Denmark. Our operations are located primarily in Denmark and Belgium. Data will be transferred out of your country to Denmark and/or Belgium.

