# **Privacy Statement**

Version 17-02-2025 ENG

# Introduction

Euphoria processes personal data about you when you visit our websites and when you use our services and, in doing so, provide us with these data yourself. Because it is known or possible to find out who you are on the basis of your login data or on the basis of personal data you have entered or on the basis of technical data, personal data are processed in the sense of European privacy legislation: General Data Protection Regulation (GDPR).

# Responsibility

Euphoria provides hardware- and software solutions for her Customers. With these products and services personal data will be processed, in which the Customer will formally be the Controller in the meaning of the GDPR. This makes Euphoria the Processor in the meaning of the GDPR.

Besides the before mentioned processing of personal data there will also be personal data processed via our websites of site-visitors, prospects, customers and applicants. For this processing Euphoria is formally the Controller in the meaning of the GDPR.

Contact details of Euphoria are:

- Postal address: Wilhelminapark 36, 5041 EC Tilburg, the Netherlands
- Email address: FG@euphoria-mobility.com

# Data Protection Officer (DPO)

Euphoria has appointed a DPO to ensure that the processing of personal data is done in a secure manner, in accordance with the requirements and guidelines set by law. If you have any questions about privacy aspects of the processing of your personal data, please address them to:

- Email address: FG@euphoria-mobility.com

#### What we use your data for

Euphoria processes your personal data for the following purposes:

- to deliver our services;
- to record and present to you the routes driven by you;
- to be able to deliver your order via the webshop;
- to register subscriptions you have ordered;
- to invoice your order;
- to authenticate you when you log into an app;
- to process your application or other kind of contact request;
- to monitor operation and use of our services and improve the content.

# What is the legal basis for the processing

Euphoria is only allowed to process your personal data if there is a legitimate legal basis for doing so. This legal basis is when delivering our services and when using the webshop: legitimate interest or the execution of an agreement.

For other purposes, the legal basis is your explicit consent when using our apps, our devices or our portal.

### Personal data we process

Depending on the service you use, Euphoria may process the following personal data about you:

- When you log in: username, password;
- When you place an order: name, address, postal code, city, country, email address, telephone number, company name, VAT number;
- When you subscribe: vehicle registration number(s), name, address, postcode, city, country, account number (IBAN), company name;
- When you use our apps or devices: driver card number, phone number, location, indications for suitable transport;
- Various browsing data relating to your activities within the portal.

# **Location details**

To properly record the location during the course of a trip, when the app is active, the GPS coordinates of the current location are recorded in the background, every minute. This allows us to record an adequate trip registration and to provide you with a map showing the route driven at the end of a trip.

# Monitoring website traffic (cookies)

Euphoria uses cookies to monitor and improve the use and operation of its portals and programmes. A cookie is a small text file that is stored on your computer, tablet or smartphone the first time you visit a portal.

You can opt out of cookies by setting your internet browser to no longer store cookies, but this may affect your user experience. In addition, you can also delete any information previously stored via your browser settings.

# Sharing data with others

Euphoria stores the data of her services on servers in the EER, in the Netherlands.

Euphoria may use other organisations to process personal data. When this is the case, we conclude a so-called Data Processing Agreement (DPA) with this party to ensure that at least the same level of security and confidentiality of your data is maintained. Euphoria remains responsible and liable for these processing operations.

Euphoria never sells your data to third parties and will only provide it to others if necessary to comply with a legal obligation.

# DataStudio

When you use the service DataStudio, Euphoria will transfer data to organisation Stofloos. A DPA has been concluded with this organisation. This formally regulates that all conditions and restrictions that apply to the processing of personal data by Euphoria are imposed on this subcontractor in the same way.

Stofloos only receives the data necessary for the proper operation of the DataStudio functionality. They are also only allowed to process these data in the context of DataStudio and thus can and should never use them for any other purpose.

Euphoria remains responsible and liable for the processing of personal data by Stofloos at all times.

#### How long we store data

Euphoria will not retain your personal data for longer than is necessary to fulfil the purposes for which your data is collected. The retention period(s) are:

- When you place an order: for the expected lifetime of the product ordered;
- When a service is provided from a subscription: for the duration of the subscription purchased.

These retention periods apply unless laws and regulations require a different minimum or maximum period under specific circumstances, for example in the case of data relating to a financial transaction.

# Confidentiality

All Euphoria employees who might have access to your data have been screened against a certificate of conduct (VOG) and have signed a confidentiality agreement.

#### Security

Euphoria takes the protection of your data extremely seriously and has taken appropriate measures to prevent misuse, loss, unauthorised access, unwanted disclosure and unauthorised modification. Euphoria organises its information security through an Information Security Management System (ISMS) and is ISO27001-certified.

If you feel that your data is nevertheless not properly secured or there are indications of misuse, please contact us, via:

- Email address: FG@euphoria-mobility.com

#### Your rights regarding to your data and the processing

The applicable privacy legislation has regulated that you, as a data subject, have a number of rights regarding to the processing of your personal data. You have the right to access, amend, delete or transfer your personal data. You also have the right to restrict, or stop processing. Even if you have previously given your explicit consent to a specific processing, you can withdraw your consent at any time.

You should always address your request to the Controller of the specific processing. When Euphoria is the Controller, and not one of her Customers, than you can send a request regarding these rights to:

- Postal address: Wilhelminapark 36, 5041 EC Tilburg
- Email address: FG@euphoria-mobility.com

To ensure that the request has been made by you, we will contact you and ask for confirmation. Depending on the situation and type of data, we may ask you to show proof of identity to verify that it is indeed your data.

Euphoria will respond to your request as soon as possible, but at the latest within four weeks.

# Complaints

If you have a complaint regarding to the processing of your personal data, please address it to:

- Email address: FG@euphoria-mobility.com

Euphoria will treat your complaint confidentially. If your complaint about Euphoria's processing is not handled to your satisfaction, you can address a complaint about it to the Dutch data processing authority, via:

- Website: www.autoriteitpersoonsgegevens.nl