

Privacy Policy - Data Protection

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<https://www.ott.ie/privacy-policy/>

Preamble

Tessares S.A., a company based in Belgium (hereinafter "Tessares", "Company", "we", "us", "our") and operating services under the brand name Ottie, attaches great importance to your privacy and respects it. To that end, we have developed a privacy policy that describes how we collect, use, disclose, transfer and/or store ("process") your personal information when you subscribe to the Ottie services (Ottie failsafe and Ottie boost) and use the Ottie application ("Services").

If you have any comments or concerns regarding the handling of personal data, you will find our contact information at the end of this data protection declaration.

Last published version

The last published version of the Privacy Policy is available online at the following address: <https://www.ott.ie/privacy-policy/>. The Privacy Policy is available in other languages but this English version prevails over all other versions.

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1. What is the scope of this privacy policy?

The purpose of this privacy policy is to inform our customers, their staff members and/or Service users about how we handle their personal information in the context of the conclusion of the agreement and provision of our Services.

2. How do we use / process your personal information?

Below you will find an overview of the purposes for which data processing operations that may affect you are carried out.

2.1. Management of our Services

More specifically, your data may be processed in the following contexts and in the following ways.

2.1.1. Contexts of use

A. Conclusion and negotiation of contracts

We use personal data for the conclusion and administrative management of contracts.

In this context, the following categories of data can be collected and processed:

- General identification data (surname, first names, function ...)
- Contact data (e-mail and postal addresses, telephone numbers ...)
- Professional identification data (VAT number...)
- Financial identification data (account number, direct debit mandate ...)
- Data related to the conclusion of the contract (date, signature ...)
- Data related to the invoicing of the Services and payments (date of invoices, object of Services, dates of payments...)

Duration of retention. The data is kept for as long as the contract lasts. It may be kept at the end of the contract as evidence of the proper performance of the contract, during the statutory limitation period. If the contract is not concluded, the data is kept for no longer than 6 months after the end of the negotiation.

B. Creation and maintenance of online accounts

We process your personal data to facilitate account creation and authentication and otherwise manage user accounts. We may process your information so you can create and log in to your account, as well as keep your account in working order.

In this context, the following categories of data can be collected and processed:

- General identification data (surname, first names)
- Contact data (e-mail address ...)
- Authentication and account login data
- Metadata relating to the account (creation date ...)
- Data relating to the use of our Services (type and number of equipment, data on the use of our Services (use of connections ...))

Duration of retention. This data is kept as long as the account is active and is not kept for more than 6 months after the account is closed.

C. Delivery of equipment

We process personal data to ensure the delivery of equipment necessary for the provision of our Services to our customers and their end users.

In this context, the following categories of data can be collected and processed:

- General identification data (surname, first names ...)
- Contact data (e-mail and postal addresses, telephone numbers ...)
- Delivery and installation data (date, ...)

Duration of retention. The data is retained throughout the duration of the contract, with the exception of the delivery address. This particular data is retained for the duration necessary to facilitate the delivery, along with an additional 6-month period to serve as evidence of the successful completion of the delivery.

D. Customer support

We process your personal data to respond to user inquiries/offer support to users. We may process your information to respond to your inquiries and solve any potential issues you might have with the requested service.

In this context, the following categories of data can be collected and processed

- General identification data (surname, first names)
- Contact data (e-mail address, phone number, ...)
- Follow-up data given including correspondence exchanged

Duration of retention. The data is automatically deleted 6 months after ticket closing.

E. Technical performance of our Services

We process your personal data :

- to deliver and facilitate delivery of Services to the user. We may process your information to provide you with the requested service.
- to protect our Services. We may process your information as part of our efforts to keep our Services safe and secure, including fraud monitoring and prevention.

Moreover, in the context of our Ottie boost service, we pass Service users' Internet traffic through a network node that we operate. We do not store your electronic communications metadata which are exclusively used to enable the transmission of your electronic communications through our network.

In this context, the following categories of data can be collected and processed:

- Networking information (name of ISP, Home Wi-Fi SSID, city, Mobile network data such as cell ID, etc)
- Connection data (time of connection and disconnection to our Services ...)
- Data relating to the user's equipment (number and types of equipment ...)
- Metadata relating to incidents affecting our Services, whatever their origin (date and nature of incidents ...)

Duration of retention. The data is kept for 6 months after the end-user ceases to use the service.

Furthermore, if you use our Ottie application, we may also collect the following information if you choose to provide us with access or permission:

- *Geolocation Information.* We may request access or permission to track location-based information from your mobile device, either continuously or while you are using our mobile application(s), to provide certain location-based services. If you wish to change our access or permissions, you may do so in your device's settings.
- *Mobile Device Access.* We may request access or permission to certain features from your mobile device, including your mobile device's sms messages, Wi-Fi, and other features. If you wish to change our access or permissions, you may do so in your device's settings.
- *Push Notifications.* We may request to send you push notifications regarding your account or certain features of the application(s). If you wish to opt out from receiving these types of communications, you may turn them off in your device's settings.
- *Application analytics.* We collect data on the use of the application (pages visited, time spent on page, etc)

2.1.2. Legal basis for processing

We use your data to fulfil a contract request and/or for the execution of contracts we conclude with our customers.

This data is processed insofar as it is necessary for the performance of a contract concluded with you or to follow up a request from you before the conclusion of a contract, if necessary through a third party (Article 6, 1, b) of the GDPR). Where in the course of our activities, data concerning persons other than those who subscribe to the contract are provided to us (staff member within a company and/or end users of our Services), we consider that we have a legitimate interest in using this data in order to follow up on the request and to carry out the contract (Article 6, 1, f) of the GDPR).

2.1.3. Source of data

The data is provided to us by the customer, the Service users or generated by the use of our Services. If you are a staff member of one of our customers, we may have received your contact details in order to provide you with our Services under a contract with this customer.

2.1.4. Communication of data to third parties

The relevant data may be passed on to third-party service providers for the purpose of performing technical services and for the delivery and/or installation of equipment.

If you are a staff member of one of our customers, we may need to provide this customer some data about you relating to our performance of the contract (e.g. date of delivery of equipment at your home).

We will however never communicate the users' connection/disconnection data.

2.2. Carrying out statistical analysis

We also use data relating to technical services and the use of our Services for aggregate data analysis.

- Amount of data transferred over the mobile network
- Metadata relating to incidents affecting our Services, whatever their origin (date and nature of incidents ...)

We believe that we have a legitimate interest in being able to develop a better understanding of the sectors in which we are active through the analysis of the data we hold that relates to our activities (Article 6, 1, f) of the GDPR). We do not engage in individual profiling of our customers or Services users.

2.3. Management of our tax and accounting obligations

2.3.1. Categories of data processed and purposes of processing

Data concerning you may also appear in our accounting documents (invoices, account statements, bank statements ...).

In this context, the following categories of data can be collected and processed:

- General identification data (surnames, first names ...)
- Contact data (e-mail address, postal address ...)
- Financial identification data (bank account number ...)
- Professional identification data (ECB/VAT number)
- Billing and payment data

2.3.2. Legal basis for processing

This data is processed in order to meet our accounting and tax obligations (Article 6, 1, c) of the GDPR).

2.3.3. Duration of retention

The data is kept for the legal period prescribed for the conservation of accounting and tax documents.

2.3.4. Communication to third parties

Our accounting data is reported to the relevant tax authorities and we outsource certain accounting tasks to an external office that acts on our instructions.

2.4. Management of rights, complaints and litigation and defend of our interests

2.4.1. Categories of data and purposes of processing

In the event of a complaint or dispute, the data of customers or our users is processed for management and follow-up. This potentially includes all the data we process that concern you or or that we consider relevant to the defence of our rights and interests.

2.4.2. Legal basis for processing

We believe we have a legitimate interest in being able to process this data to defend our rights and interests (Article 6, 1, f) of the GDPR).

In addition, to comply with the requirements of the General Data Protection Regulation (GDPR), we may need to process your data. This is particularly the case if you exercise your rights (see section on this below), if we have to deal with security incidents that impact your data or if we have to respond to a request from a competent supervisory authority under the Article 6, 1, c of the GDPR.

2.4.3. Sources

In addition to the data we hold, we may also receive data from third parties (lawyers, bailiffs ...) in our files.

2.4.4. Duration of retention

In general, the retention period depends on the legal period during which we may be liable (for the performance of our contractual obligations) or on the need to retain the data in order to be able to defend our interests (in the event of a dispute, complaint or proof of compliance with our obligations (exercise of rights or control by the competent authorities)).

2.4.5. Communication to third parties

When we use the services of external advisors or actors (e.g. a lawyer or a bailiff), your data may be communicated to them. However, this will only be done for the purpose of carrying out the task entrusted to them.

In the event of a dispute, the data may be communicated to third parties (legal counsel, insurers, courts and judicial actors ...).

3. How do we keep your data safe?

We aim to protect your personal information through a system of organisational and technical security measures.

We have implemented appropriate and reasonable technical and organisational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access our Services within a secure environment.

4. Where is the data processed?

The data we process is stored securely on European territory. We use third party companies for IT services (cloud, etc). These companies and their staff may not use the data for their own purposes and only act on our instructions.

5. What are your privacy rights?

5.1. Rights

The GDPR gives you rights, including those summarised below, but which may be subject to limitations or conditions:

- The right to request information about the processing of your data,
- The right to request access to your data (obtain a copy),
- The right to request rectification of your data (e.g. if you believe it is inaccurate or out of date) or deletion of your data (e.g. because it is no longer relevant),
- The right to object to the processing of your data in certain cases, in particular where the data is used for marketing purposes,
- The right to request the restriction of the processing of your data,
- The right to the portability of your processed data that you have provided in the context of a contract,
- The right to withdraw consent at any time if the data is processed on this legal basis.

5.2. How to contact us?

You can exercise your rights by using the contact details provided in the section "Contact us" below.

We may ask you to prove your identity by providing us with documentary evidence before we process your request. You can also contact the authority that monitors compliance with this regulation (the Data Protection Authority: <https://autoriteprotectiondonnees.be>). In addition, you have the right to appeal to the courts and to lodge a complaint with the Data Protection Authority if you believe that the use of your data does not comply with the regulations or that your rights are not being respected.

5.3. How can you access and change your data in your account?

You can access your connection data and your profile data at any time in your account. If you wish to update your personal details or terminate your account, you can:

- Contact us by using the contact details provided in the section "Contact us" below.
- Log in to your account settings and update your user account.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our legal terms and/or comply with applicable legal requirements.

If you have questions or comments about your privacy rights, you may email us by using the contact details provided in the section "Contact us" below.

6. Do we make updates to this notice?

We may update this privacy notice from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

7. Contact us - How can you contact us about this notice?

If you have questions or comments about this notice, you may contact us by email at privacy@tessares.net, or by post to:

Tessares S.A.
Avenue Jean-Monnet 1
1348 Louvain-la-Neuve
Belgium

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