

# Data protection FairFleet GmbH

(May 1st, 2020)

## Preliminary note

The website and the services provided by FairFleet are provided by FairFleet GmbH, Gotzinger Str. 48, 81371 Munich

Telephone: +49 (0) 89 5191 9916

Email: [datenschutz@fairfleet360.com](mailto:datenschutz@fairfleet360.com)

Web: [fairfleet360.com](http://fairfleet360.com)

Managing Directors: Alexander Engelfried, Marco Kreuzer, Dario Manns, Florian Waubke

Register entry: Commercial Register, HRB 239862

Register court: Munich District Court

(hereinafter: "We").

As the operator of the website and the related services, we are responsible for the collection, use, processing and forwarding (hereinafter: "processing" or "to process") of personal data of the users (hereinafter: "you") within the meaning of the General Data Protection Regulation ( "GDPR"). Our range of services includes our website with all subdomains, as well as all FairFleet products and services.

We take the protection of your personal data very seriously and protect your privacy and your private data. We process your personal data in accordance with the content of these data protection regulations and strictly adhere to the rules of the data protection laws of the Federal Republic of Germany, the Telemedia Act ("TMG") and the data protection regulations of the European Union (hereinafter: "data protection regulations"). These data protection regulations regulate which of your personal data we process. We therefore ask you to read the following explanations carefully.

We will oblige our employees and cooperation partners to comply with the data protection requirements. For all data protection questions and notifications, please contact the data protection officer of FairFleet GmbH at the email address [datenschutz@fairfleet360.com](mailto:datenschutz@fairfleet360.com) by mail at the above address or telephone at the above number.

## 1 Processing of personal data

1.1 Personal data in the sense of this data protection regulation is all information about you that relates to you as an identified or identifiable person, e.g. data about your personal or factual circumstances. In order to provide our services, to set up data protection and compliance management and to contact you, we process the following personal data, which you enter when registering and completing your profile:

Full name

address

Company name

Address with street, house number, post code and city

Telephone number and mobile phone number

In addition, we process data related to your account regarding drones, permits, insurance documents, previous pilot projects, etc. in order to be able to provide our range of services.

1.2 Personal data also includes information about your use of our website. In this context, we collect personal data from you as follows: Information about your visits to our website, such as the extent of the data transfer, the location from which you access data from our website and other connection data and sources that you access. This is usually done by using log files and cookies. Further information on log files and cookies can be found below in Section 3.1

1.3 We store your personal data as long as you use our services. We will delete your personal data (see Section 2.1), which you provided to us as part of the registration as soon as you request this in your account, via email or by post. Personal data that you provide to us as part of the registration and use of our services (items 2.2 and 2.3) will be deleted within 90 days after you cancel the service or delete your account. Any storage of your personal data going beyond this time results from legal regulations, such as statutory retention requirements for invoices addressed to you.

## **2 Intended use**

The purpose of the use of your personal data mentioned under 1.1 is explained below.

### **2.1 Processing of your data or personal data after registration:**

When registering via our homepage, it is necessary to enter your email address and your name. We process these in order to create an account for you to use our service. This includes all the technically necessary communication, questions about your account or resetting your password. We will also use your email address to send you newsletters, information and tips. This information may also contain

advertising information about our own products or those of our cooperation partners. Your company name and your postal address are also displayed in your account and can be changed at any time.

In addition, this data is forwarded to the online software "Lexware Office" for the purpose of creating a proper invoice.

We also process your telephone number and / or mobile number. We process these for display in your profile and for contacting you in order to send you information by phone or SMS.

You can also store your own profile picture in your profile and upload references from previous customers for whom you have the authorization to upload. Regardless of whether you provide a profile picture or references that allow conclusions to be drawn about you as a person, we process this exclusively for display in your profile, as well as for our operations team.

## 2.2 Contact and support inquiries

We use various forms on our website to be available to you. This includes forms for general inquiries (contact forms) as well as for specific support inquiries (support forms). We process your personal data transmitted to us (surname, first name, email address, telephone number and / or mobile phone number) exclusively in order to communicate with you in the course of processing your request.

## 2.3 Consequences of not providing personal data

As shown above, we need your personal data for the purpose of providing the various FairFleet services. If the above-mentioned personal data is not provided, you cannot use FairFleet services or support, or you cannot use them to their full extent. At least, your email address is always required to validate your account and for technical communication with support inquiries, questions about your account or to reset your password. In the case of booking paid services, at least your surname and first name, your postal address and the services you have booked, in order to receive payments from you and to prepare you a proper invoice.

## 2.4 Processing of your data and personal information by visiting our website or its subdomains:

Visiting our website <https://fairfleet360.com> or all other FairFleet related domains or their subdomains or forwarding on our website or its sub-domains, we use your personal information for the following purposes:

- to provide the services you require within the scope of the FairFleet GmbH service offering and the services you have selected (see section 2 Purpose);
- to ensure that our website is presented to you in the most effective and interesting way;

- to meet our obligations under contracts between you and us;
- to communicate with you, to make your data available to you, to send newsletters, information or notices and
- to inform you about changes to our services.

### **3 Information about your computer, cookies and targeting**

3.1 Every time you access our site, we lawfully process the following information about your computer on the basis of Article 6 (1) (f) GDPR: the IP address of your computer, the request from your browser and the time of this request. We also collect product and version information about the browser used and the operating system of your computer. We also record the website from which our page was accessed , the type of device, screen resolution, language, country in which the browser type is located, the parts of our website that you visit and the duration of your visit. The IP address of your computer is only saved for the time you use the website and then deleted immediately or made anonymous by shortening it. The rest of the data is stored for a limited period of time. We use this data for the operation of our website, in particular to determine and eliminate errors on the website, to determine the utilization of the website, for statistical purposes, to prevent misuse and to make adjustments and improvements.

3.2 We may also process information about your use of our website by using so-called browser cookies. These are small text files that are stored on your data carrier and that save certain settings and data for exchange with our system via your browser. A cookie usually contains the name of the domain from which the cookie data was sent, information about the age of the cookie and an alphanumeric identifier. Cookies enable our systems to recognize the user's device and to make any default settings available immediately. This is for the purpose of logging and improving the functionality of the website on computers or other devices. As soon as a user accesses the platform, a cookie is transferred to the hard drive of the user's computer. The cookies we use do not contain any data that personally identify you, such as name, telephone number, postal and email address, bank details or credit card information. Cookies help us to improve our website and to be able to offer you a better and more customized service. They enable us to recognize your computer when you return to our website and thereby:

- store information about your preferred activities on the website and thus tailor our website to your individual interests. This includes, for example, advertising that corresponds to your personal interests;
- speed up the processing of your inquiries.

3.3 Our website uses so-called tracking technologies (such as Google Analytics and Hotjar). We use these technologies to make our internet offerings more interesting for you. This technology enables internet users who have already been interested in our website to be addressed with advertising on our partners' websites. The display of these advertising materials on our partners' sites is based on cookie technology and an analysis of previous usage behavior. This analysis takes place under a pseudonym and no usage profiles are merged with your personal data. If you do not agree to the creation of usage profiles, you can disagree to this by notifying us. A special opt-out cookie will then be stored on your computer, which must be saved permanently. If you delete this cookie or it is automatically deleted by browser settings, you must reinstall this cookie when you visit our site again.

3.4 We work with business partners such as Facebook, Google and other affiliate services who support us in making our internet offer and the website more interesting for you; any advertising links will be identified as such on the website. Therefore, cookies from these partner companies are also saved on your hard drive when you visit the website. These are cookies that are automatically deleted after the specified time. The cookies from our partner companies only collect data under a cookie ID, which enables our advertising partners to address you with advertising that could actually interest you. How to prevent the use of such cookies can be found in section 3.5.

3.5 According to §15 of the current version of the Telemedia Act, you as a website visitor have the right to disagree to the data storage of your (anonymously collected) visitor data also for the future. Cookies are stored on your device and you have full control over their use. You can deactivate cookies or restrict the transmission of data by cookies by changing the settings of your web browser. Cookies that have already been saved can be deleted at any time. Corresponding instructions can be found in the help of your browser or on the website of your browser manufacturer. Please note that in this case you may only be able to use our website to a limited extent or not at all. If you only want to accept our own cookies, but not the cookies of our service providers and partners, you can select the "Block third-party cookies" setting in your browser.

3.6 The website provider automatically collects and stores information in so-called server log files, which your browser automatically transmits to us. These are: browser type and browser version, operating system used, referrer URL, host name of the accessing computer, time of the server request. This data cannot be assigned to specific people. This data is not merged with other data sources. We reserve the right to check this data retrospectively if we become aware of specific indications of illegal use.

## **4 Data security**

All information that you transmit to us is stored on servers within Germany. Unfortunately, the transmission of information via the Internet is not completely secure, which is why we cannot guarantee the security of the data

transmitted to our website via the Internet. However, we secure our website and other systems by technical and organizational measures against loss, destruction, access, modification or distribution of your data by unauthorized persons. In particular, we transfer your personal data in encrypted form. We use the coding system SSL (Secure Socket Layer) or TLS (Transport Layer Security)].

## **5 Disclosure of your personal data**

The personal data you enter will only be collected and stored for our internal use and for our own purposes. We only pass on personal data to third parties if:

- you have given your consent to the transfer of data;
- we are entitled or obliged to pass on data due to legal regulations and/or official or judicial orders. This can be, in particular, the provision of information for purposes of law enforcement, security or to enforce intellectual property rights;
- we arrange one or more processors who also use the personal data exclusively for internal use, which is attributable to us. We can also arrange for the transfer to one or more third parties, who also use the personal data exclusively for internal use, which is attributable to the fulfillment of our contractual performance.

## **6 Data protection and third-party websites**

The website may contain hyperlinks to and from third-party websites. If you follow a hyperlink to one of these websites, please note that we cannot assume any responsibility or guarantee for third-party content or data protection conditions. Please make sure you are aware of the applicable data protection conditions before you transfer personal data to these websites. We also use the services listed below to optimize our processes. This represents a legitimate interest within the meaning of Art. 6 para. 1 lit. f GDPR.

### **6.1 Google Analytics**

This website uses functions of the web analytics service Google Analytics. The provider is Google Inc., 1600 Amphitheater Parkway, Mountain View, CA 94043, USA. Google Analytics uses so-called "cookies". These are text files that are stored on your computer and that enable an analysis of your use of the website. We only use Google Analytics with activated IP anonymization. This means that the IP address of the user is shortened by Google within member states of the European Union or in other contracting states of the Agreement on the European Economic Area. The full IP address is only transferred to a Google server in the USA and abbreviated there in exceptional cases. The IP address transmitted by the user's browser is not merged with other Google data. The information generated by the cookie about your use of this website is usually transmitted to a Google server in the USA and stored there. Google is certified under the terms of the "EU - US Privacy Shield Framework". Furthermore, we have concluded a contract for order data processing with Google Analytics. This is a contract in which Google undertakes to protect the data of our users, to process it on our behalf in accordance with its data protection regulations and, in particular, not to pass it on to third parties. You can find details on the processing of data by Google [here](#).

### 6.1.1 Browser plugin

You can prevent cookies from being saved by making the appropriate settings in your browser software; however, we would like to point out that in this case you may not be able to use all functions of this website to their full extent. You can also prevent Google from collecting the data generated by the cookie and relating to your use of the website (including your IP address) and from processing this data by Google by downloading the browser plug-in available under the following link and install: <https://tools.google.com/dlpage/gaoptout?hl=de>

### 6.1.2 Demographic characteristics in Google Analytics

This website uses the "demographic characteristics" function of Google Analytics. This allows reports to be created that contain information about the age, gender and interests of the website visitors. This data comes from interest-based advertising from Google and visitor data from third-party providers and cannot be assigned to a specific person. You can deactivate this function at any time via the ad settings in your Google account or generally prohibit the collection of your data by Google Analytics as shown in the point "Objection to data collection".

### 6.2 Google AdWords

We use the online advertising program "Google Ads" and, as part of Google AdWords, conversion tracking. The provider is Google Inc., 1600 Amphitheater Parkway, Mountain View, CA 94043, USA. The cookie for conversion tracking is set when a user clicks on an ad placed by Google. Cookies are small text files that are stored on your computer system. These cookies lose their validity after 30 days and are not used for personal identification. If the user visits certain pages of this website and the cookie has not yet expired, Google and we can recognize that you clicked on the advertisement and were forwarded to this page. Every Google AdWords customer receives a different cookie. Cookies cannot therefore be tracked via the websites of AdWords customers. The information obtained using the conversion cookie is used to create conversion statistics for AdWords customers who have opted for conversion tracking. Customers learn the total number of users who clicked on their ad and were redirected to a page with a conversion tracking tag. However, you will not receive any information that can be used to personally identify users. If you do not want to participate in tracking, you can object to this use by easily deactivating the Google Conversion Tracking cookie via your Internet browser under user settings. You will then not be included in the conversion tracking statistics. You can find more information about Google's data protection regulations at the following Internet address: <http://www.google.de/policies/privacy/>

### 6.3 Google Tag Manager

This website uses the Google Tag Manager. This service enables website tags to be managed via an interface. The Google Tool Manager only implements tags. This means: No cookies are used and no personal data is collected. The Google Tool Manager triggers other tags, which in turn may collect data. However, the Google Tag Manager does not access this data. If deactivation has been carried out at the domain or cookie level, it remains in place for all tracking tags insofar as these are implemented with the Google Tag Manager. You can deactivate the tags for Google Analytics and Facebook Pixel implemented in Google Manager under section 6, section 1.2 and section 6, section 6 of this data protection declaration. The data protection information can be found here: <https://www.google.de/tagmanager/use-policy.html>

#### 6.4 Hotjar

On the website, the service provider Hotjar and, as part of it, analyzes user behavior. The provider is Hotjar Ltd, Level 2, St Julians Business Center, 3, Elia Zammit Street, St Julians STJ 1000, Malta, Europe. Hotjar helps us provide our end users with a better user experience and service, helps us diagnose technical problems, and analyzes user trends. Above all, the functionality of the Hotjar-based website can be improved through the services of Hotjar by making them more user-friendly, more valuable and easier for the end user to use.

The service provider can quickly and effectively identify and improve individual visual and functional problems. The data collected in this way is anonymized and cannot be traced back to real identities. Information fields are automatically made in advance by the service provider and therefore unrecognizable before our inspection.

You can find more information about Hotjar [here](#). You can prevent Hotjar from collecting your data at any time by visiting the Hotjar-based website by going to <https://www.hotjar.com/legal/compliance/opt-out> and deactivating Hotjar 'click or activate' Do Not Track (DNT) 'in your browser. You can prevent the storage of cookies by setting your browser software accordingly; however, we would like to point out that in this case you may not be able to use all functions of this website to their full extent.

#### 6.5 Facebook plugins (like button and Facebook pixel)

Plugins from the social network Facebook, provider Facebook Inc., 1 Hacker Way, Menlo Park, California 94025, USA, are integrated on our pages. You can recognize the Facebook plugins by the Facebook logo or the “Like” button on our website. An overview of the Facebook plugins can be found here: <https://developers.facebook.com/docs/plugins/>. When you visit our website, the plugin creates a direct connection between your browser and the Facebook server. Facebook receives the information that you have visited our site with your IP address. If you click the Facebook "Like" button while you are logged into your



Facebook account, you can link the content of our pages to your Facebook profile. This enables Facebook to assign your visit to our website to your user account. We would like to point out that, as the provider of the website, we have no knowledge of the content of the data transmitted or how it is used by Facebook. You can find further information on this in Facebook's data protection declaration at <https://de-de.facebook.com/policy.php> If you do not want Facebook to be able to associate your visit to our website with your Facebook user account, please log out of your Facebook user account. In addition, we use the function of the Facebook conversion pixel or visitor action pixel which, by calling this pixel from your browser, Facebook can subsequently recognize whether a Facebook advertisement was successful, for example, has led to an online purchase. We only receive statistical data from Facebook without reference to a specific person. This enables us to measure the effectiveness of Facebook ads for statistical and market research purposes. In particular, if you are logged in to Facebook, we refer you to their data protection [information https://www.facebook.com/about/privacy/](https://www.facebook.com/about/privacy/) .

## 6.6 LinkedIn

Our website uses functions of the LinkedIn network. The provider is LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA. Every time you visit one of our pages that contains LinkedIn functions, a connection to LinkedIn servers is established. LinkedIn is informed that you have visited our website with your IP address. If you click the "Recommend" button from LinkedIn and are logged into your LinkedIn account, LinkedIn is able to assign your visit to our website to you and your user account. We would like to point out that, as the provider of the website, we have no knowledge of the content of the transmitted data or its use by LinkedIn.

Further information can be found in LinkedIn's data protection declaration at: <https://www.linkedin.com/legal/privacy-policy>

## 6.7 YouTube

Our website uses plugins from the YouTube site operated by Google. The website is operated by YouTube, LLC, 901 Cherry Ave., San Bruno, CA 94066, USA. If you visit one of our pages equipped with a YouTube plug-in, a connection to the YouTube servers will be established. The YouTube server is informed which of our pages you have visited. If you are logged into your YouTube account, you enable YouTube to assign your surfing behavior directly to your personal profile. You can prevent this by logging out of your YouTube account. YouTube is used in the interest of an attractive presentation of our online offers. This represents a legitimate interest within the meaning of Art. 6 para. 1 lit. f GDPR. Further information on the handling of user data can be found in YouTube's data protection declaration at: <https://www.google.de/intl/de/policies/privacy>

## 6.8 MailChimp

Our newsletters are sent using "MailChimp", a newsletter distribution platform from the US provider Rocket Science Group, LLC, 675 Ponce De Leon Ave NE # 5000, Atlanta, GA 30308, USA. Your e-mail addresses for receiving the newsletter, as well as their other data described in the context of this information, are stored on MailChimp's servers in the USA. MailChimp uses this information to send and evaluate the newsletter on our behalf. Furthermore, according to its own information, MailChimp can use this data to optimize or improve its own services, for example to technically optimize the dispatch and presentation of the newsletter or for economic purposes to determine which countries the recipients come from. MailChimp does not use this data to write to you or to pass it on to third parties. With the help of MailChimp we can analyze our newsletter campaigns. If you open an email sent with MailChimp, a file contained in the email (so-called web beacon) connects to the servers of MailChimp in the USA. In this way it can be determined whether a newsletter message has been opened and which links have been clicked on. In addition, technical information is recorded (e.g. time of access, IP address, browser type and operating system). This information cannot be assigned to the respective newsletter recipient. They are used only for statistical analysis of newsletter campaigns. The results of these analyzes can be used to better adapt future newsletters to the interests of the recipients. If you do not want an analysis by MailChimp, you have to unsubscribe from the newsletter (see Section 7 of this data protection declaration). Data processing is based on your consent (Art. 6 Para. 1 lit. a GDPR). You can revoke this consent at any time by unsubscribing from the newsletter. The legality of the data processing that has already taken place remains unaffected by the revocation. The data you have stored with us for the purpose of subscribing to the newsletter will be stored by us until you unsubscribe from the newsletter and deleted after you unsubscribe from the newsletter both from our servers and from the servers of MailChimp. Data that we have saved for other purposes (e.g. e-mail addresses for the member area) remain unaffected. We trust in the reliability and IT and data security of MailChimp. MailChimp is certified under the terms of the "EU - US Privacy Shield Framework" and is subject to the "US - Swiss Privacy" framework. MailChimp is committed to complying with EU data protection regulations. Furthermore, we have concluded a "data processing agreement" with MailChimp. This is a contract in which MailChimp undertakes to protect the data of our users, to process it in accordance with its data protection regulations on our behalf and, in particular, not to pass it on to third parties. You can view MailChimp's data protection regulations here: <https://mailchimp.com/legal/privacy/>

## 6.9 PayPal

If necessary for the processing and payment of your contract, we will transfer the collected and stored data, especially payment data, to PayPal (Europe) S.à rl et Cie, SCA, 22-24 Boulevard Royal, L Pass on -2449 Luxembourg as part of payment processing. Details on the handling of personal data by PayPal are described in

more detail in PayPal's data protection information. You can find this here: [https://www.paypal.com/de/webapps/mpp/ua/privacy-full?locale.x=de\\_DE](https://www.paypal.com/de/webapps/mpp/ua/privacy-full?locale.x=de_DE)

## 6.10 Google My Business

FairFleet has a Google My Business account. The service is provided by Google Inc., 1600 Amphitheater Parkway, Mountain View, CA 94043, USA. We use it to get feedback from customers and pilots, thus guaranteeing internal quality management and continuously improving our services. The input and public provision is made by the (Google) user himself. After processing the order, the user is provided with a link and can leave feedback on the service at his own discretion. Use of the feedback for, for example, your own marketing measures takes place with the consent of the author.

## 6.11 Google Maps

As part of the contractual service with FairFleet, FairFleet GmbH, Google Maps API, uses a service from Google Inc. Google Maps enables GPS points to be determined for order areas and to ensure that the order runs smoothly. Google Maps is an integral part of the handling of FairFleet's services. The handling of data entered by the user is subject to the data protection regulations of Google Inc., FairFleet uses the data only for order processing.

## 6.12 WeTransfer

We sometimes use WeTransfer for the transmission and fast transfer of data between FairFleet GmbH and the customer who ordered the service / s. The service is provided by WeTransfer BV, Oostelijke Handelskade 751, 1019 BW Amsterdam, Netherlands, registered at the Dutch Chamber of Commerce at 34380998. The link provided for the transfer of the data can be used for a limited time. The files are encrypted before the transfer and are therefore not attributable to natural persons. The link expires automatically after successful transmission. If not individually determined, access to the download is subject to a maximum of 28 days until the data is automatically deleted from the WeTransfer servers.

The handling of the data during the transfer is subject to the data protection regulations of WeTransfer. Learn more about this at: <https://wetransfer.com/legal/terms>

## 6.13 Amazon Web Services

Based on our legitimate interests in the efficient and secure provision of our

website and services we use hosting services from Amazon Web Services, Inc.. The services we obtain include infrastructure and platform services, computing capacity, storage space and database services, security services and technical maintenance services. Amazon operates numerous servers in Europe (for FairFleet we only use the ones in Frankfurt) in order to be able to provide data to you as quickly as possible. However, it cannot be technically excluded that your browser (e.g. because you access this website from outside the EU or for any other reason) access a server from outside the EU. In such a case, data is sent from your browser directly to the respective country (North and South America, Asia, Australia). Amazon is certified under the Privacy Shield Agreement and thus offers a guarantee to comply with European data protection law ([more information here](#)). [AWS Privacy Policy](#)

#### 6.14 Trustpilot

The online evaluation platform Trustpilot is used on the FairFleet website. The processing is based on the following legal basis:

- To fulfill their legal obligations (see Article 6.1.c GDPR) and to set up an online evaluation platform in accordance with e.g. “The Unfair Commercial Practices Directive”, the “ICPEN Online Assessment and Endorsement Policy”, the 2008 UK Consumer Protection Act against unfair trade, the Competition and Markets Authority's policy for online reviews and endorsements, the Danish Consumer Representative's guidelines on the publication of consumer reviews, the Danish Marketing Practices Act, etc.
- To pursue their own legitimate business interests in relation to the operation of the website and the provision of our services or to pursue legitimate interests of third parties, as long as your interests and fundamental rights do not override these interests (see Article 6.1.f GDPR),
- If necessary, to assert, exercise or defend legal claims (see Article 9.2.f GDPR). Further content can be found at [de.legal.trustpilot.com/end-user-privacy-terms](https://de.legal.trustpilot.com/end-user-privacy-terms). For processing, evaluation and presentation of the ratings, this information is sent to Trustpilot A / S, Pilestræde 58, 3rd floor, 1112 Copenhagen K, Denmark, registration number (CVR) 30 27 65 82, ([support@trustpilot.com](mailto:support@trustpilot.com)).  
The personal information and data will not be passed on to third parties, but will only be used for internal purposes.

#### 6.15 Zoho

FairFleet uses the services of Zoho Corporation Pvt. Ltd, Chennai, Estancia IT Park, Plot No. 140 & 151, GST Road, Vallancherry Village, Chengalpattu Taluk, Kanchipuram District 603 202, India.

Zoho offers online tools that FairFleet uses to support parts of their business. These include tools for customer relationship management, customer service, social engagement, community building and data analysis. When providing these tools, Zoho processes data that FairFleet transmits to its services or instructs it to process it in its own name. Although FairFleet decides which data should be transmitted, it usually includes information about their customers, prospects and users of online tools, such as contact information, purchases and billing information.

To fulfill these purposes, Zoho can access the data to provide the services, resolve technical or business issues, follow instructions from FairFleet that submitted the data, or in response to contractual requests.

All customer data transferred from FairFleet to Zoho is protected with strict encryption protocols. Transport Layer Security encryption (TLS 1.2 / 1.3) with strong encryption keys is used on all connections to the Zoho servers. This applies to all connections, including internet access, API access, mobile apps and access to the IMAP / POP / SMTP email client. TLS ensures a secure connection by enabling the authentication of both parties involved in the connection and by encrypting the data to be transmitted. In addition, the services use opportunistic TLS as standard for emails. TLS offers secure encryption and delivery of emails and reduces interception attempts between mail servers in cases where peer servers support this protocol.

The encrypted connections offer full support for Perfect Forward Secrecy (PFS). This ensures that even if threats would arise in the future, previous communication cannot be decrypted. Zoho has also activated HTTP Strict Transport Security (HSTS) for all Internet connections.

Inactive customer data is encrypted using the 256-bit Advanced Encryption Standard (AES). The Zoho servers are located in the most secure data centers in the United States, the EU and China.

Further information on the data protection declaration of Zoho Inc. can be found under the following links:

<https://www.zoho.com/de/privacy.html>

<https://www.zoho.com/de/sites/gdpr.html>

<https://www.zoho.com/de/security.html>

## **7 Cooperation with processors and third parties**

If we disclose data to other persons and companies (processors or third parties) as part of our processing, transmit them to them or otherwise give them access to the data, this will only be done on the basis of legal permission (e.g. if the data transfer

to third parties is required to fulfill the contract according to para 6 GDPR), you have consented, a legal obligation provides for this or on the basis of our legitimate interests.

If we commission third parties to process data on the basis of a so-called "order processing contract (Auftragsverarbeitungsvertrages)", this is done on the basis of Art. 28 GDPR.

## **8 Transfers to third countries**

If we process data in a third country (i.e. outside the European Union (EU) or the European Economic Area (EEA)) or if this takes place within the scope of the use of third-party services or disclosure or transmission of data to third parties, this will only take place if it is carried out to fulfill our (pre) contractual obligations, based on your consent, on the basis of a legal obligation or on the basis of our legitimate interests. Subject to legal or contractual permissions, we process or have the data processed in a third country only if the special requirements of Art. 44 ff. GDPR are met. This means that processing takes place, for example, on the basis of special guarantees, such as the officially recognized determination of a data protection level corresponding to the EU (e.g. for the USA through the "Privacy Shield") or compliance with officially recognized special contractual obligations (so-called "standard contractual clauses").

## **9 Newsletter data**

Possibly we also offer a newsletter on our website. We will only use your email address and voluntary personal information to send you the newsletter if you have given your express consent. An e-mail address is sufficient to receive the newsletter. Any additional voluntary information about yourself is only used to personalize the newsletter. At the end of each newsletter there is a link that you can use to unsubscribe from the newsletter at any time.

If you receive emails from us, we may use analysis tools to collect data, e.g. when you open our email or click on links or banners in our emails. This data helps us assess the effectiveness of our news and marketing campaigns.

## **10 Changes to this privacy policy**

We reserve the right to change this privacy policy at any time with future effect. A current version is available on the website [fairfleet360.com/legal/privacy](https://fairfleet360.com/legal/privacy). Please visit the website regularly and inform yourself about the applicable data protection regulations.

## **11 Your rights and contact**

On the basis of the data protection regulations, you can obtain information about your personal data free of charge at any time or ask for it to be corrected,

completed, deleted or blocked, unless this is contrary to legal regulations. You can also request restrictions for processing of your personal data. For these purposes, in particular the revocation of your consent to this data protection declaration, the permission to process your personal data in accordance with this data protection declaration or to receive further information about it, please contact the data protection officer of FairFleet GmbH:

FairFleet GmbH  
Gotzinger Str. 48, 81371 Munich  
Telephone: +49 (0) 89 5191 9916  
E-Mail: [datenschutz@fairfleet360.com](mailto:datenschutz@fairfleet360.com)

Please write a message by post or notify us by email or phone using the contact details above. If you send us inquiries via the contact form, your details from the inquiry form, including the contact details you provided there, will be stored and processed by us for the purpose of processing the inquiry and in the event of follow-up questions. The legality of the data processing operations carried out before the revocation remains unaffected by the revocation.

Apart from that, you have the possibility to contact us via our presence on social media (Twitter, Facebook, Instagram, LinkedIn). The data collected in this way (e.g. name or account) will only be saved for the duration of the processing and will not be used for other purposes without your consent. The storage on the part of the respective social medium is subject to the respective data protection regulations of the companies.

If you have any questions, comments or requests regarding the collection, storage, processing or use of your personal data by us, please also contact the data protection officer of FairFleet GmbH using the above contact details.

Furthermore, you have the right (according to Art. 77 GDPR) to complain with the responsible authorities about the data processing we have carried out. The responsible supervisory authority for data protection issues is the state data protection officer of the federal state in which our company is based. A list of data protection officers and their contact details can be found at the following link: [https://www.bfdi.bund.de/DE/Infothek/Anschriften\\_Links/anschriften\\_links-node.html](https://www.bfdi.bund.de/DE/Infothek/Anschriften_Links/anschriften_links-node.html)

You also have the right that data - we have processed based on your consent or automatically in fulfillment of a contract – is handed over to yourself or to a third party in a common, machine-readable format. If you request the direct transfer of the data to another person responsible, this will only take place if it is technically feasible.