

PRIVACY POLICY

FOR THE USE OF TOUCHGUARD

1 WHO PROCESSES PERSONAL DATA

The controller of Personal Data is **TTC apki, s.r.o.**, Company ID No. 194 03 429, with its registered office at Třebohostická 987/5, 100 00 Praha 10, Czech Republic, registered in the Commercial Register kept by the Municipal Court in Prague under File No. C 386033 (hereinafter referred to as the “**Controller**” or “**we**”).

Contact e-mail address for Personal Data protection enquiries: **gdpr@ttc.cz**

Where content entered by a customer is processed within TOUCHGUARD, in particular data relating to employees, visitors, contact persons or other persons recorded by the customer, we typically act as a **processor** in relation to such data, while the relevant customer acts as a **controller** of Personal Data.

2 WHO IS COVERED BY THIS POLICY

This Policy applies in particular to:

- visitors to our website,
- users of TOUCHGUARD who have been assigned the “Responsible Person” authorisation within the system,
- customer contact persons,
- persons communicating with us, in particular by e-mail, telephone or through support services,
- persons subscribed to newsletters or marketing communications, where such communications are sent,
- other persons whose Personal Data is processed in connection with the operation and use of TOUCHGUARD, including persons recorded by customers within TOUCHGUARD, in relation to whom we typically act as a processor where the relevant functionality is activated.

3 WHAT PERSONAL DATA WE PROCESS

Depending on the particular circumstances, we may process the following categories of Personal Data:

3.1 Identification and Registration Data

- first name and surname,
- organisation name or business name,
- user account identifier,
- personal identification number,
- roles and permissions within the organisation and/or within rámci TOUCHGUARD,
- data required for the registration, activation and administration of a Customer Account.

3.2 Contact Data

- e-mail address,
- telephone number,
- registered office or place of business,
- contact, delivery and invoicing details.

3.3 Payment and Transaction Data

- data relating to orders, licences and activated modules,
- data relating to payments made,
- invoicing data,
- data relating to contractual and accounting settlement.

3.4 User and Operational Data

- account usage data,
- login logs, audit records and security logs,
- technical identifiers, IP addresses, device type and access time,
- data relating to the use of functionalities, configuration, activated modules, retention settings and use of the service,
- records of security incidents and operational events.

3.5 Data Entered into the Service

Within TOUCHGUARD, data entered by the customer or user, as well as data generated as a result of the use of the system and activated functionalities, may be processed, including for example

- name,
- surname,
- e-mail,
- personal identification number,
- telephone (calls/SMS),
- photograph,
- IMEI device,
- User location (GPS coordinates),
- visitor's name and surname,
- visitor's telephone number,
- vehicle registration number,
- company name,
- data obtained from scanned identity documents where the relevant functionality is activated,
- heart-rate status or alert information within TOUCHGUARD WATCH,
- other data contained in input forms, notes, attachments, exports or communications.

3.6 Communication Data

- the content of communications with support services,
- records of requests, complaints and incidents,
- communication metadata.

3.7 Marketing Data

- information regarding consent to receive newsletters,
- marketing communication preferences,
- information regarding unsubscribing or objecting to marketing communications,
- information regarding e-mail opens and interactions with marketing communications, where such measurement is carried out in accordance with applicable law.

4 PURPOSES AND LEGAL BASES FOR THE PROCESSING OF PERSONAL DATA

4.1 Contract Conclusion and Performance, Account Operation and Service Provision

We process Personal Data for the following purposes:

- creation and administration of a user account,
- identification of the user and organisation,
- provision of TOUCHGUARD,
- enabling access to the service,
- administration of permissions and roles,
- operation, hosting or support of on-premise solutions,
- user account administration, data synchronisation, logging and security monitoring,
- communication with the customer in connection with the service.

Legal basis: performance of a contract or the implementation of measures prior to entering into a contract.

4.2 Invoicing, Accounting and Compliance with Legal Obligations

We process Personal Data for the following purposes:

- issuing and maintaining accounting and tax documents,
- maintaining accounting books and records,
- compliance with obligations under tax, accounting and other applicable laws.

Legal basis: compliance with legal obligations.

4.3 Security, Logging and Protection of Our Rights

We process Personal Data for the following purposes:

- securing accounts and the service,



- prevention of misuse, fraud and unauthorised access,
- detection of incidents and security events,
- maintenance of audit records,
- protection of our rights and legal claims.

Legal basis: legitimate interest in the secure operation of the service and the protection of our rights

4.4 Support, Complaints, Incidents and Requests

We process Personal Data for the following purposes:

- handling enquiries, complaints and technical requests,
- resolving incidents and errors,
- providing customer support,
- providing assistance in connection with the exercise of data subjects' rights, where relevant.

Legal basis: performance of a contract; in certain cases, our legitimate interest in the proper provision of support and the documentation of communications

4.5 Marketing Communications and Newsletter

Where permitted by law, or where we have obtained your consent, we may process your Personal Data for the purpose of sending marketing communications, newsletters and information about our products and services.

Legal basis:

- legitimate interest, to the extent permitted by applicable laws, in particular in relation to existing customers and similar products or services,
- alternatively consent, where required.

Where we send marketing communications on the basis of legitimate interest or under the so-called soft opt-in regime, you have the right at any time to object or to unsubscribe in a simple manner.

4.6 Web Analytics and Cookies

Where we use analytical or marketing cookies or similar technologies, we process related Personal Data for the purpose of measuring website traffic, improving the website, analysing usage and carrying out marketing activities.

Legal basis:

- consent, where required,
- legitimate interest in relation to essential technical cookies and similar technologies necessary for the basic functionality and security of the website.

Further details are provided in the cookie banner, where used.

5 HOW WE OBTAIN PERSONAL DATA

We obtain Personal Data in particular:

- directly from you when registering, placing an order, communicating with us or using the service,
- from your employer, organisation or account administrator,
- automatically through your use of the website or the service,
- from our contractual partners, such as hosting or infrastructure providers,
- from system settings, activated modules, roles, retention rules and other configurations implemented by the customer within TOUCHGUARD,
- from publicly available sources, such as conferences, presentations, websites, social media platforms and similar sources, where appropriate and lawful, in particular for the purpose of establishing or developing a business relationship.

6 TO WHOM WE DISCLOSE PERSONAL DATA

We may disclose Personal Data in particular to the following categories of recipients:

- providers of cloud, hosting and/or infrastructure services,
- providers of communication, e-mailing and support tools,
- our legal, tax, accounting and technical advisers, and companies within the TTC Group where they provide relevant internal support services to us,
- public authorities, where required by applicable law,
- additional processors or subcontractors involved in the provision of TOUCHGUARD.

We disclose Personal Data to recipients only to the extent necessary for the relevant purpose.

As of the date of execution of the related contractual documentation, the following additional processor is involved in the provision of TOUCHGUARD:

- **SH.cz s.r.o.** – managed server / server hosting / infrastructure administration,
- country of processing: **Czech Republic**.

7 INTERNATIONAL TRANSFERS OF PERSONAL DATA

We primarily seek to ensure that Personal Data is processed within the EU or EEA.

Where Personal Data is transferred outside the EU/EEA, we ensure that such transfer takes place in compliance with applicable laws, in particular on the basis of:

- adequacy decision,
- Standard Contractual Clauses;
- or another appropriate transfer mechanism.

Where Personal Data is transferred to the United Kingdom of Great Britain and Northern Ireland, such transfer takes place on the basis of a European Commission adequacy decision pursuant to Article 45 of the GDPR. In such case, no specific authorisation or additional transfer mechanism is required unless



the applicable legal framework changes.

Upon request, we will provide further information regarding the transfer mechanism used, where relevant.

8 HOW LONG WE RETAIN PERSONAL DATA

We retain Personal Data only for as long as necessary for the purposes for which it was collected, or for the period required by applicable laws or necessary for the protection of our rights.

This includes, in particular:

- user account data for the duration of the Customer Account and for a reasonable period thereafter,
- contractual and communication data for the duration of the contractual relationship and subsequently for the period necessary for the defence of legal claims,
- communication data for a reasonable period where no contractual relationship is established,
- accounting and tax documents for the period required by applicable legal regulations,
- security and operational logs for a period appropriate to their purpose,
- marketing data until consent is withdrawn or an objection is raised, or for the period otherwise permitted by applicable legal regulations.

Within TOUCHGUARD, the standard retention period for information generated through the use of the system, in particular reports, logs and records, is set at **12 months**. Data older than 12 months is automatically deleted by the system. The customer may shorten this period through the system settings or request that the settings be modified accordingly; the minimum unit by which the retention period may be shortened is one calendar month.

Following termination of the Agreement or the last Licence, Personal Data and user data will generally be deleted or anonymised within **ten business days**, unless applicable legal regulation requires their further retention or it is necessary to retain a limited scope of data for the purpose of settling outstanding obligations, or where such data is temporarily retained in backup copies as part of the standard backup cycle. In such case, the data will be retained only to the extent necessary and for no longer than necessary

9 YOUR RIGHTS

Subject to the conditions laid down by applicable legal regulations, you have the following rights in relation to the processing of your Personal Data, which you may exercise using the contact details provided in Section 1:

- the right of access to Personal Data,
- the right to rectification of inaccurate or incomplete Personal Data,
- the right to erasure,
- the right to restriction of processing,
- the right to data portability,



- the right to object to processing,
- the right to withdraw consent, where processing is based on consent,
- the right to lodge a complaint with a supervisory authority.

Where we process Personal Data for direct marketing purposes, you have the right to object to such processing at any time. In such case, we will no longer process your Personal Data for those purposes.

10 WHEN WE ACT AS A PROCESSOR

Where our customers enter their own data into the system, and we process such data on their behalf in the course of providing the service, we typically act as a processor in relation to such data.

In such cases:

- we process the data in accordance with the customer's instructions,
- the customer is responsible for the lawfulness of the processing and compliance with information obligations,
- the customer is responsible for the content of the data entered into TOUCHGUARD, in particular the content of user-defined forms, fields, notes, attachments and other inputs,
- special categories of Personal Data or other sensitive data should not be entered into the system without prior agreement, unless the relevant functionality expressly provides for such data,
- further details are governed by the Data Processing Agreement (DPA).

If you are a data subject and your Personal Data was entered into the system by one of our customers, you should contact that customer as the controller.

11 AUTOMATED DECISION-MAKING AND PROFILING

We do not use personal data for automated decision-making that has legal effects on you, unless we have expressly informed you of this and have an appropriate legal basis for doing so.

The functionalities of TOUCHGUARD, including the evaluation of certain operational or security conditions, are intended primarily to support operational, security and record-keeping activities and do not in themselves constitute automated individual decision-making concerning the rights of natural persons that would produce legal effects concerning them or similarly significantly affect them without human intervention.

12 HOW WE PROTECT PERSONAL DATA

We implement appropriate technical and organisational measures to protect Personal Data, in particular against unauthorised access, loss, destruction, damage or misuse.

Such measures may include, in particular:

- access and permission management,
- authentication of users and administrators,

- logging and auditing,
- database protection through access-control mechanisms,
- backup and recovery,
- vulnerability management and security updates,
- incident and security event management processes,
- training and contractual or organisational measures to ensure confidentiality.

TOUCHGUARD also includes the functionality “**Anonymisation of Deleted Persons (Users)**”, which may be activated by the customer in the system settings. Activation of this functionality ensures that, upon deletion of a user from the system database, the user's first name and surname are replaced with the system-generated value “**Anonymised Deleted Record**”.

13 PRODUCT IMPROVEMENT AND USE OF DERIVED DATA

We may use anonymised, aggregated or otherwise de-identified data and statistical information for the purpose of evaluating the use of the service and improving its functionalities, performance, security and user experience, provided that no specific natural person can be identified from such data.

14 NEWSLETTER AND MARKETING COMMUNICATIONS

Where we send you marketing communications on the basis of your consent, you may withdraw that consent at any time.

Where we send you marketing communications to the extent permitted by applicable laws without requiring separate consent, you may opt out of receiving further communications at any time by simple means.

15 COOKIES AND SIMILAR TECHNOLOGIES

We may use cookies and similar technologies on our website for the following purposes:

- ensuring basic functionality,
- security
- remembering user preferences,
- analytics, where used,
- marketing, where used.

Further details are provided in a separate cookie banner or related notice, where used.

16 CHANGES TO THIS POLICY

We may update this Policy from time to time. The current version will always be published on our website or otherwise made available to users and customers by appropriate means

Effective as of **1 May 2026**