KOMPaaS

Data Privacy statement for KOMPaaS.tech GmbH

General

KOMPaaS.tech GmbH (hereinafter – KOMPaaS) attaches great importance to protecting your personal data. We process your data in accordance with European and national data protection regulations. We always inform you what personal data we collect, how your data is used, and how you can influence the process.

We give particular importance to the General Data Protection Regulation (GDPR), the Data Protection Act (DSG) and the Telecommunications Act (TKG).

In this data processing policy, we inform you about the most important aspects of data processing within our website.

Where can you find the information that is important to you?

This data privacy information provides an overview of the items which apply to KOMPaaS processing your data. All the data protection information is available at https://kompaas.tech/terms-and-conditions/

Who is responsible for data processing? Who should you contact if you have any queries regarding data privacy at KOMPaaS?

The party responsible for data is KOMPaaS.tech GmbH, 1070 Vienna, Austria, Lindengasse 56. You can always contact our Data Protection Office by e-mail or by phone: +44 203 966 1370/ info@kompaas.tech

Why do we use your personal data?

- To resolve any problems, you report about and to provide support-related services.
- To administer our website and internal operations, including solving of problems and ensuring the security of our website.
- To provide you with suitable services tailored to your usage requirements and to recommend additional services.
- We also process your underlying data as well as other personal data internally in order to detect and resolve failures in our network or in our services, to be able to detect fraud, and for network planning and optimization.
- To comply with legal obligations when necessary. These obligations may include implementing or defending legal requirements or complying with the order of any court or authority, and disclosing information to a government or regulatory authority.
- To analyze network usage, ensure service quality, and prevent fraudulent or unlawful use of our communication services. This processing is based on our contractual obligations (Art. 6(1)(b) GDPR) and legitimate interests in

maintaining network integrity and security (Art. 6(1)(f) GDPR), in accordance with § 167(5) TKG. *Only metadata (e.g., call frequency, duration, and destination) is processed for these purposes, and the content of your communications remains confidential unless otherwise required by law.*

What rights do you have?

a) To *request* information on the categories of personal data concerned, the purpose of the processing, any recipients of the data, the envisaged storage period (Art. 15 GDPR);
b) To request *incorrect* or *incomplete* data is rectified or supplemented (Art. 16 GDPR);
c) To *withdraw* consent at any time with effect for the future (Art. 7 (3) GDPR);
d) To *object* to the processing of data on the grounds of legitimate interests, for reasons relating to your particular situation (Art 21 (1) GDPR);
e) To request the *erasure* of data in certain cases under Art. 17 GDPR – especially if the data is no longer necessary in relation to the purposes for which it was collected or is unlawfully processed, or you withdraw your consent according to (c) above or objected according to (d) above;
f) To demand under certain circumstances the *restriction* of data where erasure is not possible or the erasure obligation is disputed (Art. 18 GDPR);
g) To *data portability*, i.e. you can receive your data which you provided to us, in a commonly used and machine-readable format, such as CSV and can, where necessary, transmit the data to others (Art. 20 GDPR);
h) To *file a complaint* with the competent supervisory authority regarding data processing.

What data do we process?

The main data we use is the contact and payment information that you give us at the conclusion of the contract or in the course of the current contractual relationship.

Other personal data or data that you or third parties give us when entering into a contract or during a contractual relationship (e.g. date of birth, occupation).

Traffic data or the data that is generated when using our services (e.g. for the purpose of sending a message to the communications network) and that we need for billing purposes, including so-called location data.

This term *does not include* sensitive data according to data protection law ("special categories of personal data" within the meaning of Article 9 of the General Data Protection Regulation), in particular racial and ethnic origin, political opinions, religious or ideological beliefs, trade union membership, genetic data or health data.

Where are your data processed?

In general, your data is processed in Austria and in other European countries.

If your data is also processed in countries outside the European Union (i.e. in third countries) by way of exception, this is done only if you have explicitly given your consent or it is required so we can

provide you with services or it is prescribed by law (Art. 49 GDPR). Furthermore, your data is only processed in third countries if certain measures ensure a suitable level of data protection (e.g. EU Commission's adequacy decision or suitable guarantees, Art. 44 ff. GDPR).

How long do we keep your data?

Personal data for which there is no legal retention obligation will be deleted after the end of the contractual relationship. We comply with Austrian and European laws and regulations, such as the Federal Tax Code (§ 207f BAO) or the Commercial Code (§ 212 UGB), regarding the retention period. Access to such data will be restricted after termination of the contractual relationship. This restriction may be lifted in accordance with legal obligations.

Your traffic data will be retained until the account is challenged in court or a claim for payment is made. After that, the data will be deleted. If a court case arises, the data will be kept until the authority makes a final decision.

It is possible that the data will be anonymized instead of deleted.

In this case, any personal reference will be irretrievably deleted, so the obligation to delete data also does not apply.

Do we provide data to our contractors?

We may be required to share your data with our contractors (for data processing) in order to provide the services you have requested. These contractors keep and process your data on a strictly confidential basis and subject to appropriate security measures and safeguards.

Saving your contact information

To be able to respond to your inquiry, we store the contact information you use, such as your email address, phone number, address or social media identifier, as well as the time and content of your inquiry. To respond to your inquiry, especially if it relates to technical issues or inquiries about products or services you use, we may also need to process your master data and traffic data stored by us, as well as any records of previous contact with you.

If you use the callback service on our website, we will retain the phone number you entered so that we can contact you upon request.

Payment information

We process your email address in order to send you an invoice. Of course, you can also find your bills in your personal account on our website.

If you wish to pay your bill by direct debit or SEPA credit card, we work with banks, credit card companies, and other payment processors. When processing credit card payments, we work with Raiffeisen Bank Zrt. H-1054 Budapest, Akademia, 6.

Occasionally, after the termination of our contractual relationship, we may inform you about our services. You may withdraw your consent or cancel your subscription to receive promotional information at any time by writing to us.

Customer Identification

In accordance with the legal provisions of national regulations, TKG and the Regulation on Identification, we are obliged to establish your identity before entering into a contract.

As part of our identification process, the following personal data is collected: first name, last name, date of birth. Depending on the chosen authentication process (e.g. photo ID), we may also be required to take a photo of you and your official photo ID.

If there is any doubt about your identification, we may ask for additional information to verify your identity. All these measures are taken to protect your rights and privacy.

Information about changes

If there is any change or important information, such as your contract, privacy policy, in the identity of the controller, we want to let you know in time. To do this, we use your basic data to inform you by phone, mail, SMS or email.

KOMPaaS websites

KOMPaaS supports many websites, such as https://kompaas.tech/, which also contain personal data. When you visit them, data may be processed. More information about the processing of personal data on our websites can be found here or on the relevant website.

Profiling

We use automated data processing methods (also known as profiling) to improve our products and services. Among other things, this process helps us to make appropriate personalized suggestions to you based on your previous usage behavior or, for example, to identify and resolve problems. Using this procedure eliminates automatic decisions that are legally binding on you.

Right of appeal

If you believe that we have violated European or Austrian data protection law when processing your data, we kindly ask you to contact us so that we can clarify any questions you may have. Of course, you also have the right to file a complaint with the Austrian data protection authority (www.dsb.gv.at) and the supervisory authority within the EU.