



# Privacy Policy

ALFA LOGISTIKA respects the privacy of its users and is fully committed to the protection of their personal data. This Privacy Policy explains how ALFA LOGISTIKA (“ALFA LOGISTIKA”, “we”, “we”, “our”) processes information about individuals, including personal data, regarding the use of the website and the GPS tracking system / platform and IoT ("service"). Here you will find detailed information about what types of data we collect and why, what we do with them and what your rights are.

The list of our services is available at the web address: [alfalogistika.hr](http://alfalogistika.hr)

By accessing or using this website or any of our Services, you agree to the terms set out in this Privacy Policy, Cookie Policy and other terms and policies published on our website. If you do not agree to this Privacy Policy, you must leave this website and discontinue all use of any of our Services.

## 1 Information we process

### 1. Article

ALFA LOGISTIKA collects, generates and receives information in a variety of ways when you use the Service, place an order or visit our website. Some of this information constitutes personal data.

### 2. Article

When you open an account on one of our services or on the GPS / IoT tracking service or place an order, you provide us with the following information that contains your personal information:

- Full name;
- E-mail address;
- Payment information;
- Phone number;
- Shipping/billing address;
- Any other information, which you provide for this purpose.

Some information may be processed while you use our Service. Depending on the scope and configuration of Service, this information may also contain your personal data:



- Your vehicle data (for example, make, type and brand of the vehicle, mileage, technical information, etc.);
- Driver's data (location, routes, driving habits, speed, direction, etc.);
- Digital tachograph and driver's data and activities (for example, driver's license number, name, time spent on breaks, start, stop and end time of driving, driving duration, tachograph calibration, tachograph manufacturer, information on tachograph control, absence calendar, etc.);
- Web browser data (for example, IP address, browser type, version, etc.);
- Other data, which we can receive during the use of our Service and which, in connection with other information, may contain personal data (for example, temperature data, fuel sensor data, etc.).

### **3. Article**

Upon configuring your account settings on [gps-tracking-platform.com](https://gps-tracking-platform.com) or on the Service, you may provide us some information that may contain personal data:

- Driver's data (for example, name, e-mail address, phone number, birth date, driver's license number, digital tachograph card number and other data, which you have provided);
- Fleet data, according to your use and configuration of GPS / IoT tracking services;
- Communication history with you;
- Other information, which may contain your personal data (for example, location, time zone, photo etc.).
- You can choose to integrate third-party services with respect to certain aspects of the GPS / IoT tracking service.
- The Third Party Service is software that integrates with the Service and you may enable or disable such integration for your account on the GPS / IoT tracking service or on the web shop. When enabled, the relevant third party service provider may share or receive certain information (including import or export). You should check the privacy settings of these third-party services to understand what information might be disclosed.

### **4. Article**

Upon visiting our website, we may collect and process the following information that may contain your personal data:

- your device and browser;
- your IP address;
- Other information is collected from cookies and similar technology we use. Learn more about how we use



Learn more about how we use Cookies on our website or service by reading our Cookie Policy.

## 2 Purposes of processing

### 5. Article

ALFA LOGISTIKA will process your personal data in order to provide you with the Service, improve it, solve any Service-related issues you may have, and ensure that you receive the best customer experience possible.

### 6. Article

ALFA LOGISTIKA collects and processes your personal data for the following purposes:

- To register you for the use of the Service, verify your identity and create your accounts on gps-tracking-shop.eu and/or GPS Tracking Service;
- To send you invoices and process payments for the Service;
- To personalize your use of the Service when you set up your account settings;
- To analyze your preference or use of the Service;
- To communicate with you to inform you about Service and provide you any Service-related support, answer your questions, and process your requests;
- To improve Service or to develop new features within the Service;
- To analyze and measure how our Service is used. For example, we analyze data about your usage of the Service to
- Optimize product design, to generate reports and create statistics;
- To deliver personalized ads, promotions, and offers to you;
- To protect the legal interests of ALFA LOGISTIKA, its users, and other third parties and for legal reasons such as, e.g. enforcing our Terms & Conditions, agreements or policies, complying with any applicable law, and assisting law enforcement authorities.

## 3 Legal grounds for the processing

### 7. Article

ALFA LOGISTIKA only collects and processes your personal data where we have a lawful basis. Legal grounds for the processing of your personal data vary depending on the specific group of data and the purposes for processing it.



Note that we may be processing the same personal data for several purposes simultaneously and, respectively, on more than one legal ground.

### 3.1 Contract.

Most of the time the legal basis for processing your personal data is the contractual relationship between you as the user of Service and ALFA LOGISTIKA, since we need certain information to conclude the contract and fulfill our obligations arising out of this contract.

### 3.2 Legal obligation.

In some cases, ALFA LOGISTIKA processes personal data on basis of legal obligations, imposed on us by applicable law, such as financial and tax reporting obligations, or if we have to respond to the legal process.

### 3.3 Legitimate interests.

The processing of your personal data is necessary for the realization of the legitimate interests of ALPHA LOGISTICS or the legitimate interests of third parties, always ensuring that such processing will not exceed your rights and freedoms. For example, we may process your data for marketing purposes based on our legitimate interest in developing and improving our business. Other legitimate interests include maintaining the Service to meet the needs of our customers and clients, advertising to make our Service available to users, detecting and preventing fraud, abuse, security and technical problems with the Service, fulfilling obligations to our partners, enforcing regulations and managing financial receivables, etc.

### 3.4 Consent.

When you subscribe to our blog or newsletter, we will send you information, for example, our news, promotions, or offers, based on your consent. Note that you have the right to withdraw your consent at any time and unsubscribe by using the unsubscribe link provided in the e-mail or by contacting us.

## 4 Retention period

ALFA LOGISTIKA will process your personal data for as long as any of the above-mentioned legal basis for data processing exist. At the end of this period, ALFA LOGISTIKA will delete your data.

## 5 Sharing your personal data with third parties

## 8. Article



For ALFA LOGISTIKA to be able to provide you with our Service, we work with third parties that provide us with different services we need in the ordinary course of our business. The categories of third party recipients (processors) of personal data include hosting and server co-location service providers, communication and content delivery networks, data and cybersecurity service providers, billing and payment processing service providers, fraud detection and prevention service providers, web analytics, email distribution and monitoring service providers, session recording service, advertising and marketing service providers, IT, legal and financial advisors, among others (“Third-Party Service Providers”).

#### **9. Article**

Third party service providers receive only the minimum amount of personal data required to provide the requested service. ALFA LOGISTIKA shares personal data only with third party service providers who have undertaken to comply with the obligations set out in this privacy policy and applicable personal data protection laws.

#### **10. Article**

In certain situations, we may have a legal obligation to share your information with third parties, if required by law or when information is required by public / law enforcement agencies.

#### **11. Article**

Personal data processed by ALFA LOGISTIKA may be transferred to Third-Party Service Providers that are located outside of the European Union. In such cases, ALFA LOGISTIKA will only share personal data with such recipients that have undertaken to comply with the necessary data protection requirements and that are able to ensure an adequate level of protection or have provided adequate guarantees.

## **6 Your rights**

#### **12. Article**

You have the right to request access to your personal data and to correct, amend, delete, transfer, or limit the use of your personal data by logging into your gps-tracking-shop and service accounts or by reaching us using the contact information provided below. Before providing information, we may be required to verify your identity, thus we may require additional information.

#### **13. Article**

If you believe that we have processed your personal data unlawfully, you have the right to submit a complaint to the contact information provided below, or to the respective data protection supervisory authority.



#### **14. Article**

Provision of personal data is a requirement necessary to receive the Service and to enter into a contract with ALFA LOGISTIKA.

## **7 Privacy policy changes**

#### **15. Article**

ALFA LOGISTIKA may occasionally amend this Privacy Policy, for example, in cases when we introduce new services or new features. The amendments to this Privacy Policy enter into force and are applied from the moment they have been uploaded to this page.

#### **16. Article**

Therefore, we encourage you to check this page from time to time. By continuing to use our Services or otherwise providing personal data to us, after the amendments to this policy have been implemented, you agree to the updated terms of Privacy Policy.

## **8 Contact information**

In case you have any questions about this Privacy Policy or our data processing practices, or if you would like to exercise any of your rights as a data subject regarding your personal data, please contact us by email:

privacy@alfaiot.eu or using the following contact information:

ALFA LOGISTIKA d.o.o.

To: Data Protection Officer

Address: Andrije Hebranga 16, 47 000 Karlovac, Croatia