

Privacy Statement and Cookie Statement of Sensoterra

Version: 2019-04-18

Identity

Sensoterra bv. KVK: 63006766
Matrix VII
Science Park 106
1098 XG Amsterdam
The Netherlands

Scope

Sensoterra processes a lot of different kinds of information, including personal data and measurement. The scope of this policy is personal data. Besides personal data, Sensoterra also processes probe data. All this data needs to be secured in a proper manner, about which you can read more in our security document.

During the processing of personal data we conform to the requirements of the General Data Protection Regulation (GDPR).

Terms

Term	Description
Sites and Applications	All websites hosted by Sensoterra and apps provided by Sensoterra.
Customer	A user that is using the services and or products of Sensoterra.
Services	Sites and Applications

Privacy

Sensoterra cares a great deal about your privacy.

Sensoterra is the party responsible for all data processing. In this privacy statement, we will explain which personal data we collect and for which purposes. We recommend that you read it carefully.

When we make a reference to sites in this document, we refer to all Sensoterra sites like www.sensoterra.com, monitor.sensoterra.com and the Sensoterra app.

This means we honour the GDPR privacy principles:

clearly specify our purposes before we process personal data, by using this Privacy Statement;

limit our collection of personal data to only the personal data needed for legitimate purposes;

process personal data **lawfully, fairly and transparently**,

make an effort to keep the personal data **accurate** and update them as needed or requested;

store personal data only for as long as needed;

take **appropriate security measures** to protect your personal data in terms of

integrity and confidentiality and we demand the same from parties who process personal data on our behalf;

we demonstrate compliance with the GDPR in terms of **accountability**;

Lawful basis for processing personal data

We process your personal data:

to enable us and take steps to let you enter into a contract with Sensoterra,

to deliver and perform under contract between you and Sensoterra,

when you have consented,

to act in our legitimate interest,

the processing is necessary for compliance of legal obligations.

International data transfers

Sensoterra serves customers around the world. Although Sensoterra is based in the Netherlands, we do not only process the personal data within the Netherlands or the European Economic Area. Sensoterra only engages with sub processors when an adequate security is present to protect the processing of personal data. An example of adequate security is the EU-US Privacy shield.

Personal data

Sensoterra processes personal data for the following purposes.

Per purpose different types of personal data are processed.

1. Hosting the infrastructure needed for the products of Sensoterra
2. Contact form
3. Handling your order
4. Access to the portal

5. Registration
6. Promotion
7. Email
8. Statistics

1 Hosting the infrastructure for products of Sensoterra

The products of Sensoterra need the infrastructure hosted by Sensoterra to work or be maintained. Sensoterra Sites and Applications are hosted by our sub processor DigitalOcean. All data centers are located within the EU. Most types of personal data addressed in this privacy policy is processed within this infrastructure. For this reason, the types of personal data are further explained below.

2 Contact Form

The contact form can be on our website and can be used to ask questions or make a request.

The contact form uses your IP address, email address, phone number, name, company name and address details. We do this on the basis of your consent. We store this information until we are sure that you are satisfied with our response and six months thereafter. This way we can easily access the information in case you have any follow-up questions and train our customer service team.

3 Handling your order

We will use your personal data when handling your order. We may share your data with the delivery service to have your order delivered. We may also obtain information on your payment from your bank or credit card company.

For this purpose, we use your payment details, phone number, billing address, email address, name and delivery address details. We store this information until your order has been completed and seven years thereafter (the legal retention period).

Providing to Third Parties

We collaborate with other organisations, that may receive the following personal data:

- Name;
- Address;
- Email;
- Phone;
- Details order to be sent;

To handle your orders, we work together with:

- Our shipment partners Rapid Logistics and Strem Chemicals, Inc. (who may use other appropriate logistics partners like DHL or FedEx)
- Our LoRa communications partner Comcast and Senet

Of these parties, Strem Chemicals, Senet and Comcast are based in the USA. Rapid Logistics is located in the European Union.

4 Access to portal

Within our portal, you can access a management environment where you can set, specify and change settings.

For this purpose, we use your email address. We store this information for six months after our Services to you have ended. Service is ended upon request from the user.

5 Registration

Activating Sensoterra sensors requires that you register an account in the Sensoterra app. You will have to provide some information about yourself and choose a username and password for your account. For this purpose, we use your email address. We store this information for six months after you have closed your account.

We will retain this data so that you do not have to re-enter it every time you visit our website, and in order to contact you in connection with the execution of the agreement, invoicing and payment, offer support, and to provide an overview of the products and Services you have purchased from us.

When necessary, we may collect location data (GPS) of your probes. If that is the case, you will be asked to grant access to location service beforehand in the Sensoterra app. Not providing access to location services will prevent proper working of the app.

This location data and other data can also be stored and processed by the provider of the navigation/mapping software, such as Google Maps, but the data could also be used by, for example, Google or Apple itself. We have no control over their actions. We recommend that you read the applicable privacy statement of the provider in question.

The app providing the service has been downloaded via a third-party app store. We have no influence on which personal data the provider will process or to what purpose it will be processed. We recommend that you read the applicable privacy statement of the provider in question.

6 Promotion

When you are using the Sites and Applications of Sensoterra, we think that you might also be interested in other new products or Services of Sensoterra. Other than the advertisements on the website, we can inform you about new products or services:

- by email (newsletter and promotional emails)
- by phone

You can object at all times against this promotional communication. Every email contains an unsubscribe link.

You can also request that you not be contacted further via telephone, in your account settings and through our customer portal site (monitor.sensoterra.com)

7 Mail

The Sites and Applications need to send you emails.
To send mail, we use the following sub processors :

Mailgun Technologies, Inc
Zendesk, Inc

8 Statistics

We use Google Analytics to keep statistics on the use of Sites and Applications.
Google Analytics is a service of Google LLC.

Sensoterra has entered into a data processing agreement with Google. We don't allow Google to use information obtained by Analytics for other Google services, and we anonymize the IP-addresses.

Security

We use best practices when implementing security measures in order to reduce misuse of and unauthorised access to personal data.

The way Sensoterra and suppliers engaged by Sensoterra secure data is described in the data security documententation.

Sub processors and third parties

For some purposes Sensoterra engages sub processors.
Per purpose we refer to the sub processors (if any) if engaged for that purpose.
Except for the sub processors mentioned below, we do not under any circumstance provide your personal data to other companies or organisations, unless we are required so by law and or in case of a legitimate request by relevant authorities.

Sensoterra engages with the following sub processors.
Per sub processor we define extra measures taken, not documented in the data security document. For more details about how Sensoterra manages data security, please review the data security document.

Sub processor	Purpose #	Organisational and or technical measures	Retention
DigitalOcean, LLC All data centers are located within the EU.	1	DigitalOcean is listed in the Privacy shield (EU-US and SWISS-US) framework as ACTIVE. EU-US Original Certification Date: 2/6/2017 Next Certification Due Date: 5/4/2019 SWISS-US Original Certification Date: 5/4/2018 Next Certification Due Date: 5/4/2019	

		DPA with DigitalOcean.	
Mailgun Technologies, Inc	7	Mailgun Technologies, Inc. is listed in the Privacyshield register (EU-US) as ACTIVE. Original Certification Date: 7/5/2017 Next Certification Due Date: 8/28/2019 DPA (V4-12-18) with Mailgun Technologies, Inc.	
Zendesk, Inc	7	Zend, Inc is listed in the Privacyshield (EU-US and SWISS-US) register as ACTIVE. EU-US Original Certification Date: 12/6/2016 Next Certification Due Date: 11/21/2019 SWISS-US Original Certification Date: 11/9/2017 Next Certification Due Date: 11/21/2019	
Google LLC	8	Google LLC is listed in the Privacyshield (EU-US and SWISS-US) register as ACTIVE. EU-US Original Certification Date: 9/22/2016 Next Certification Due Date: 9/22/2019 SWISS-US Original Certification Date: 4/18/2017 Next Certification Due Date: 9/22/2019 DPA with Google LLC.	
Strem Chemicals	3		
Senet	3		
Comcast	3		
Rapid Logistics	3		
Facebook		PII is only shared when clicking on the buttons/links. Because the the button/link has to be clicked first, we can ensure that the person clicking is intending to share PII with the social network.	
Twitter		PII is only shared when clicking on the buttons/links.	

		Because the the button/link has to be clicked first, we can ensure that the person clicking is intending to share PII with the social network.	
Linked-in		<p>PII is only shared when clicking on the buttons/links.</p> <p>Because the the button/link has to be clicked first, we can ensure that the person clicking is intending to share PII with the social network.</p>	

Sharing and publication of personal data

Customer data will not be published unless the customer has provided expressed written consent (e.g. case studies). Anonymized sensor data is used to continuously improve calibration algorithms and may be provided commercially to third parties provided that it can't be reduced to the customer.

Cookies

Our Sites and Applications make use of local storage like cookies. Cookies are small files in which we can store information, so that you do not have to fill that information again. We can also use them to see whether you are visiting us again.

The first time you visit our site, we will show you a notification explaining local storage and cookies and ask for your permission to use it.

You can disable the use of cookies through your browser setting, but some parts of our website may not work properly as a result of that.

We made arrangements with other parties who place cookies through our website.

Nevertheless, we cannot fully control what they are doing with their cookies, so please read their privacy statements as well.

Changes to this Privacy Statement

We reserve the right to modify this statement. We will notify our users of any changes to this statement.

Your rights

You can always contact us if you have any questions regarding our privacy policy or wish to review, modify or delete your personal data.

In addition, you have the following right:

- Request access to your personal data,
- Request correction or your personal data,
- Request erasure of your personal data when applicable.
- Withdraw your previously given consent and opt-out of certain communications,

Object to processing when relevant,
Request the restriction of processing,
Request a copy of your personal data or request a transfer.

Please note that you may need to provide valid identification so that we can confirm your identity. This way we do not modify or remove the data for the wrong person.

Inquiries

Should you have any official inquiry or complaint, please contact the proper authorities. For The Netherlands, this is the “Autoriteit Persoonsgegevens”.

Contact details

Sensoterra
Matrix VII
Science Park 106
1098 XG Amsterdam
The Netherlands