

Cloud-applikationer til adgangskontrol

Databeskyttelsespolitikker for cloud-applikationer til adgangskontrol

2. WHO IS THE CONTROLLER OF YOUR PERSONAL DATA?

Depending on the specific Platform you are using and the type of Customer (legal entities or individuals) who has granted you access to it, we may process your personal data under the role of data controller or data processor.

Where we act as controller, the legal entity concerned will be Salto Systems, S.L. ("Salto") with registered address at C/ Arkotz 9 Pol. Lanbarren 20180 Oiartzun (Gipuzkoa) – Spain.

If you are interested in knowing in which cases we act as controller or as processor, please continue reading to find all the details about each of our Platforms. Please note that this privacy policy is only applicable in relation to the processing of personal data carried out by Salto acting as controller of your data.

3. WHY AND WHAT FOR WILL WE PROCESS YOUR PERSONAL DATA?

In this section, you can find detailed information about the purposes of the processing that Salto will carry out on your personal data and the legal basis of said processing activities, depending on the specific Platform you are using.

3.1. Salto KS

Processing as controller:

Salto may process the personal data within Salto KS as controller in the following cases:

- **Account Data:** As you will have to register yourself as User in order to get access into Salto KS, Salto will process your data to manage your registration and to provide the services that are linked to your account. This will entitle you to manage through a single Salto KS User account all sites to which the corresponding Customers has granted you access.

You can obtain your Salto KS account in two different ways:

- . You can directly register yourself as a User of Salto KS by completing the registration form for which you will have to provide certain data related to your identity.
- .. You can be invited or added by a Customer of Salto KS who wants to grant you keys to open certain doors of their premises. This means that the Customer may provide us certain information about you (such as, name and email address).

The processing of your account data will be based on your contractual relationship with Salto as User of Salto KS, as you will need to accept the corresponding Terms of Service and/or End-User License Agreement for registering in Salto KS. For avoidance of doubt, any processing activity related with the provision of the services as well as when we contact you for Salto KS related topics, the processing will be based on these grounds.

- **Analytic related data:** We will also use your data to maintain, develop and improve our products and services, including creating and distributing reports and other materials. We always try to use only non-personal data for this purpose (unless this is not possible), so we will anonymize the information in order to eliminate your personal data. Additionally, we may use it to control compliance with our Intellectual Property rights, and when we communicate with you to keep you informed

about our products and/or services that could be of your interest.

- Site related data: Furthermore, in case you are a consumer-type Customer (i.e. a private person, who is not a company or a professional) who has purchased the subscription to the Salto KS services or your data has been added to Salto KS by a consumer-type Customer, Salto will process as controller all data within your Salto KS account. This also includes data that is related to a specific site – such as, the access permissions or keys you have been granted for accessing Customer's premises and your interaction with Salto locking products installed in such premises. However, the legal bases for the processing of your personal data are the same as mentioned above.

In addition, Salto and its Group entities may also process Users' data in case the Customer requests our tech support team's assistance for resolving a technical issue.

Processing as processor:

Even if we always process the account and analytic related data as controller, site related data may be processed as Salto under the role of processor depending of the type of client using our Platforms.

Salto may process the personal data within Salto KS as processor in the event that you are a User of a site belonging to a business-type Customer (i.e. Customers which are legal entities), Salto may process some of the data related directly to such site as data processor on behalf of our Customer who is subscribed to Salto KS services. For instance, this includes the access permissions or keys you have been granted for accessing Customer's premises and your interaction with Salto locking products installed in such premises.

3.2. Salto Nebula

Salto may process the personal data within Salto Nebula under two different roles depending on the type of Customer (consumer or business) using Salto Nebula:

- Consumer Customers – Salto as controller: Salto will process your personal data as controller in the following two circumstances:
 - In case you are a consumer-type Customer who has purchased the subscription to the Salto Nebula services; or,
 - In case you are a User who has been added or invited to create a Salto Nebula account by a consumer-type Customer, which means that the Customer will provide us certain personal data about you (such as, your name and your email address).

In these cases, your data will be processed based on:

- *Contractual or pre-contractual relationship*: As you will need to accept the corresponding Terms of Service and/or End-User License Agreement for registering in Salto Nebula, the processing of your data will be based on your contractual relationship with Salto as User of Salto Nebula. For avoidance of doubt, any processing activity related with the provision of the services as well as when we contact you for Salto Nebula related topics, the processing will be based on these grounds.
- *Legitimate interest*: We will also use your data to maintain, develop and improve our products and services, including creating and distributing reports and other materials with anonymized information. We always try to use only non-personal data for this purpose (unless this is not possible), so we will anonymize the information in order to eliminate your personal data. Additionally, we may use it to control compliance with our Intellectual Property rights, and when we communicate with you to keep you informed about our products and/or services that could be of your interest.

In addition, Salto and its Group entities may also process Users' data in case the Customer requests our tech support team's assistance for solving a technical issue.

- Business Customers – Salto as processor: Salto will process your personal data as processor in the following two circumstances:
 - In case you are a business-type Customer who has purchased the subscription to Salto Nebula services; or,
 - In case you are a User who has been added or invited to create a Salto Nebula account by a business-type Customer.

In these cases, Salto will process all your personal data within Salto Nebula (including, among others, name, email address, access rights, access activity and usage data) on behalf of our Customer for providing the services related to your Salto Nebula account.

In addition, also in the case of business customers, Salto will process your personal data as controller to maintain, develop and improve our products and services, including creating and distributing reports and other materials. In this sense, as mentioned above, we will anonymize to the possible extent the information in order to eliminate your personal data.

3.3. Salto Homelok

Salto may process the personal data within Salto Homelok under two different roles depending on the type of Customer (consumer or business) using Salto Homelok:

- Consumer Customers – Salto as controller: Salto will process your personal data as controller in the following two circumstances:
 - In case you are a consumer-type Customer who has purchased the subscription to the Salto Homelok services; or,
 - In case you are User who has been added or invited to create a Salto Homelok account by a consumer-type Customer, which means that the Customer will provide us certain personal data about you (such as, your name and your email address).

In these cases, your data will be processed based on:

- . *Contractual or pre-contractual relationship:* As you will need to accept the corresponding Terms of Service and/or End-User License Agreement for registering in Salto Homelok, the processing of your data will be based on your contractual relationship with Salto as User of Salto Homelok. For avoidance of doubt, any processing activity related with the provision of the services as well as when we contact you for Salto Homelok related topics, the processing will be based on these grounds.
- . *Legitimate interest:* We will also use your data to maintain, develop and improve our products and services, including creating and distributing reports and other materials with anonymized information. We always try to use only non-personal data for this purpose (unless this is not possible), so we will anonymize the information in order to eliminate your personal data. Additionally, we may use it to control compliance with our Intellectual Property rights, and when we communicate with you to keep you informed about our products and/or services that could be of your interest.

In addition, Salto and its Group entities may also process Users' data in case the Customer requests our tech support team's assistance for solving a technical issue.

- Business Customers – Salto as processor: Salto will process your personal data as processor in the following two circumstances:

- In case you are a business-type Customer who has purchased the subscription to Salto Homelok services; or,
- In case you are User who has been added or invited to create a Salto Homelok account by a business-type Customer.

In these cases, Salto will process all your personal data within Salto Homelok (including, among others, name, email address, access rights, access activity and usage data) on behalf of our Customer for providing the services related to your Salto Homelok account.

In addition, also in the case of business customers, Salto will process your personal data as controller to maintain, develop and improve our products and services, including creating and distributing reports and other materials. In this sense, as mentioned above, we will anonymize to the possible extent the information in order to eliminate your personal data.

3.4. JustIN Mobile

Salto will process your personal data within JustIN Mobile app under two different roles:

- Salto as controller:

When you complete the registration process in JustIN Mobile app, you become a User and as such the phone number associated to your device is assigned a randomly generated code or ID, which serves as your device's ID.

Therefore, when using JustIN Mobile App, Salto will process the following personal data as controller: phone number, the randomly generated ID of the device to which the mobile key is destined, the randomly generated ID of the digital key, date of activation and expiry of the permits associated to the premises, and room number (if applicable).

These processing activities are carried out based on the contractual relationship originated by your acceptance of our End User License Agreement in the registration process as well as in Salto's legitimate interest to maintain, develop and improve our products and services. The processing of the abovementioned data is necessary for the use of JustIN Mobile app.

In addition, Salto and its Group entities may also process Users' data in case the Customer requests our tech support team's assistance for solving a technical issue.

- Salto as processor:

Additionally, to be able to use JustIN Mobile app as a digital key, it is necessary that you are previously registered at the platform used by the Customer for managing the accesses to their premises.

For that purpose, the company in charge of such premises registers you into its Platform and assigns certain access credentials to you as controller of the data. The Customer will transfer these access credentials to Salto and every time you use the app, Salto will send back to the Customer the information regarding your access activity (e.g. information about the door you have accessed).

3.5. Cookies and similar technologies

Our Platforms may use cookies and similar technologies that allow storing and retrieving information from Users' devices in order to improve your usage experience and gain a better understanding of how Users interact with the Platform for further improvement of our services, as it is described in the corresponding Cookies Policy of each Platform. Where required by the applicable regulations, the installation of such cookies will take place, provided that you have consented it.

4. WHO COULD RECEIVE YOUR PERSONAL DATA?

In the terms described in section 3. *“Why and what for will we process your personal data?”*, Salto may transfer its personal data to its Group entities - which can be consulted in <https://www.saltosystems.com/en/quick-links/salto-systems-offices/> - (the “Group entities”) and to the required public authorities, on the grounds and for the purposes set forth in said section.

Furthermore, Salto relies on the collaboration of some third-party service providers which may have access to your personal data and process it as data processor in the name and on behalf of Salto for the provision of services. In this sense, Salto follows strict criteria of selection of service providers in order to comply with its obligations in terms of data protection and undertakes to sign with them the corresponding Data Processing Agreement, under which it will impose, among others, the following obligations: applying appropriate technical and organizational measures; processing the personal data for the purposes agreed and strictly following the written instructions of Salto; and deleting or returning the data once the provision of services ends.

We inform you that Salto does not sell your information to any third party.

5. WILL WE CARRY OUT INTERNATIONAL TRANSFERS OF YOUR PERSONAL DATA?

The aforementioned recipients can be located, in some particular cases, outside the European Economic Area (EEA). In those cases, Salto requires that said recipients comply with the measures designed to protect the personal data established in a binding written contract, such as the standard contractual clauses, except in cases where the European Commission has determined that the country where the recipient is located provides an adequate level of personal data protection. You may obtain a copy of Salto's required measures by contacting Salto at the address indicated at the end of this policy.

7. WHAT RIGHTS DO YOU HAVE WHEN YOU PROVIDE US WITH PERSONAL DATA? WHERE CAN YOU SUBMIT A CLAIM?

In accordance with current legislation, you can exercise your rights of access, rectification, erasure, restriction, objection, data portability and not to be subject to a decision based solely on automated processing, by previously proving appropriately your identity (including, if necessary, providing a copy of your ID or equivalent), through the contact form *“Contact our Data Protection Officer”*. If we are not able to identify you as a User, we may ask for additional information to this regard.

Equally, in case any processing of your data is based on your consent to Salto, you have the right to withdraw your consent for the processing based on it, at any time by writing an email to the mentioned email address. However, the withdrawal of consent shall not affect the lawfulness of processing performed before your withdrawal of consent.

If you believe that Salto or any of its Group entities has not respected any of the aforementioned rights, you will have the right to submit a claim to the competent Control Authority.

Finally, note that you can only exercise these rights towards Salto in relation to the data we are processing under the role of controller. But as we process certain personal data mentioned above as data processor on behalf of our Customers, you must directly contact the Customer (i.e. the manager of the premises for which you have been granted access to) if you have any questions or want to exercise your rights in regards to such data.

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