

PRIVACY POLICY ACCORDING TO ARTICLES 13-14 OF EU REGULATION 2016/679 (GDPR)

Dear User,

This privacy policy will allow you to clearly and fully understand how your personal data are processed by Klaxon Mobility GmbH when you use our web app.

1. WHO IS THE DATA CONTROLLER?

The data controller is **KLAXON MOBILITY GmbH**, with its legal headquarters at 9601 Arnoldstein (Austria), Industriestrasse 1. For information about data processing, you can write to the following e-mail address: info.klaxon@etac.com.

2. WHAT PERSONAL DATA DO WE COLLECT AND PROCESS?

The following categories of personal data may be processed while using our app and device:

Automatically collected technical data necessary for the operation of our services, including IP address, browser type and version, operating system used, referrer URL, browser string, host name of the accessing device, and time of the server request.

- 1) **Registration and account data**, which are necessary to create and access the app and related services, such as name, surname, e-mail address, phone number, and authentication credentials.
- 2) **Product and device-related information associated with the connected Klaxon device, including:**
 - product serial number (SN)
 - Unique Device Identification (UDI)
 - Firmware version installed on the device
 - Information relating to firmware updates performed through Over-The-Air (OTA) procedures
 - Ownership transfer information (if communicated by the user, distributors, resellers, or healthcare operators)
- 3) **Dashboard and driving data processed locally and/or displayed in real time through the Klaxon App, including:**
 - Driving speed (km/h)
 - Total distance travelled
 - Battery charge level of both the propulsion system and connected controller
 - Estimated residual autonomy
- 4) **Customized driving settings configured by the user:** such as electronic braking intensity, maximum speed, and driving mode configurations.
- 5) **Technical communication and operational security data:** generated through the interaction between the app, the motor hub, and connected controls. Such communications may include operational commands and telemetry necessary for the functioning and safety of the device.
- 6) **Information relating to incidents or malfunctions voluntarily communicated by the user:** including data concerning the event, the device involved, and related technical information, where necessary for product safety, regulatory compliance, or assistance activities.
- Our web services and apps use **cookies**, which are small text files sent from a web server to the user's browser and stored on the user's computer or other devices. Please read the cookie policy on Klaxon's website.

3. FOR WHAT PURPOSES DO WE PROCESS PERSONAL DATA AND WHAT IS THE LEGAL BASIS?

Data will be acquired and processed to achieve the following purposes. The conditions of legality of data processing are indicated alongside.

a. Registration to the app and use of related services. Personal data provided and are processed to register the account, enable access via authentication, and deliver the requested services.	Execution of a contract between the parties.
b. Security and improvement of services. Our web app records a series of logs generated by user actions to ensure their security.	Legitimate interest of Klaxon Mobility GmbH to improve the services offered and to ensure the security of the services.
c. Purposes necessary to ascertain, exercise, or defend a right in judicial proceedings or related to the case where judicial authorities exercise their functions.	Legitimate interest of Klaxon Mobility GmbH in the exercise or defense of a right.

4. NATURE OF DATA PROVISION

The provision of information requested for the purposes 1) of registration is necessary to create and access the app. Failure to provide this information would prevent registration on our app and the use of related services.

Data collected for purposes 2), 3), 4), 5), 6) are acquired automatically and are necessary for the security and improvement of our services.

5. HOW LONG DO WE STORE DATA?

Data entered during registration will initially be kept for two weeks. If the user does not complete the registration within this period, their data will be immediately deleted. Otherwise, if the registration is completed, the data will be kept until the user requests the deletion of their account.

Data necessary for the operation of our services will be kept for 14 days and then deleted.

Some data may be kept for a longer period in compliance with specific legal obligations, contractual obligations, and/or for the possible exercise or defense of the rights of the data controller.

6. WHO MIGHT YOUR PERSONAL DATA BE DISCLOSED TO?

Personal data will be processed by appropriately trained personnel operating under the authority and responsibility of the Controller. Some of the information may be communicated exclusively for the purposes specified above to the following entities:

- Companies providing assistance and maintenance of IT systems or providers of computer storage systems
- Other entities or companies that perform activities instrumental to the above purposes on behalf of the Controller.

Klaxon Mobility GmbH is a wholly owned subsidiary of Etac AB. Therefore, certain data might be also available to Etac AB employees. A detailed list of all recipients is available at the office of the Data Controller and will be provided upon request.

7. YOUR RIGHTS

General data protection law ("GDPR") provides a series of rights that can be exercised to maintain control of your data. To exercise your rights, you can write to info.klaxon@etac.com filling out and sending the appropriate forms provided by the Austrian Data Protection Authority (<https://www.dsb.gv.at/download-links/dokumente.html>) or by sending us a direct email.

We are required to respond to you within 30 days of receiving the request and will try to be as quick as possible!

Right of Access: You have the right to obtain information about the processing of personal data concerning you, access it, and obtain a copy in common electronic means. We are committed to providing you with a report of the data we hold, such as your personal details, contact data, or requests received via contact form or email.

Right of Rectification: You have the right to get your data updated, supplemented, or corrected. If you believe your data is incorrect or outdated, contact us – we will do our best to resolve the issue.

Right of Data Portability: If you wish, you can request the portability of your data processed under the execution of the contract or based on your consent.

Right of Erasure: If interested, you have the right to request the deletion of your data. We are committed to giving you control over your data. In some cases, you can ask us for direct deletion, and we will proceed as quickly as possible. However, please note that not all data can be deleted upon request as it may be necessary to fulfill legal obligations or are still in use.

Right to Restriction and Objection: You have the right to request a limitation on the processing or to object as a whole or in part to the processing of personal data concerning you, even for marketing purposes. When you request a limitation of processing, we are required to suspend any further processing activity of your data for a set period. When you decide to object to processing, you can unilaterally decide to give up a certain type of processing of your data, such as deactivating analysis cookies.

If you believe that one or more processing activities carried out by us may be in violation of the regulations or believe that your rights have not been protected, you can file a complaint with the Supervisory Authority where you usually reside, work, or where the alleged violation occurred. In Austria, you can contact the Austrian Data Protection Authority.

8. UPDATES

The evolution of our services may involve changes to this notice, which may undergo modifications and integrations over time, which may also be necessary concerning new regulatory interventions in the field of personal data protection.

We therefore invite you to periodically check its contents.

Last updated: 28.05.2026