

Anyline Apps Privacy Policy

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1. General Information

1. **Controller.** We, Anyline GmbH, Zirkusgasse 13/2b, 1020 Vienna, Austria ("**Anyline**", "**we**", "**us**") are the data controller. Information on our data protection officer is provided in section 6.1 below.
2. **Purpose and Scope.** Anyline respects the privacy of its users and created this privacy policy ("**Privacy Policy**") to make it easier for you to understand which data we collect, the nature, scope, and purpose of our data processing and provide an overview of your rights as a user. This privacy policy covers all personal data processed in relation to use of the mobile and web applications listed below (the „**Apps**“):

Mobile applications



Anyline Showcase



Anyline Collector

Web applications

SDK Demo: <https://js.anyline.com/demo/index.html>

API Demo: <https://scan.anyline.com>

3. **Applicable Law.** The processing of your personal data is in compliance with applicable data privacy provisions, including (i) the General Data Protection Regulation (Regulation (EU) 2016/679) („**GDPR**“) as well as the Austrian data protection act (*Datenschutzgesetz*).
4. **Responsibility for scanned data.** IF YOU SCAN PERSONAL DATA, WHICH IS NOT YOUR OWN PERSONAL DATA YOU WARRANT THAT YOU HAVE FULL RIGHT AND PERMISSION TO PROVIDE ANYLINE WITH SUCH PERSONAL DATA OF THE RESPECTIVE PERSON.

2. Personal data processed by Apps

1. **Data Sources.** We process the personal data that you directly or indirectly made available to us using sources listed in section 1.2. When downloading, installing or using an App it is necessary to provide personal data. Furthermore, many data capture use cases effectively require the processing of personal data. This means that you may not be able to digitize physical characters without processing of personal data (Art 13 para 2 (e) GDPR). However, if you use your device without internet connection the data processing will be performed on your device only and only sent once a plugin is initialized.
2. **Data processed during the download of an App.** For reasons of transparency please note that when you download an App from an app store the relevant app store (such as Google Play Store, Apple App Store) processes your account data such as your name, email address, account number, the time of the download or individual device identification numbers. Anyline is neither responsible for this processing nor does it receive such data.
3. **Data processed during the installation and registration of an App.** If a registration is required, Anyline will process any personal data which is directly connected to your registration, which includes:
 - your name

- contact details
- employer
- field of work

4. Unique identifier. Personal data processed via Apps is linked to a so called UUID, which is an individual number which is unique for your device. This allows us to associate scans from a specific UUID to an individual person.

5. Data processed during the use of the Apps. Anyline will process the following personal data during the use of the Apps:

- Result of the scan, depending on the use case (e.g. if you scan a license plate, the license plate number will be processed).
- Image of the scanned data
- A number which is unique for every App installation
- IP address of device
- Current location (approximation)
- Unique identifier (see paragraph above)

3. Purpose of the processing and legal basis

1. General. We collect and use personal data for specific purposes. In this section, we provide details to all scenarios and reasons where we may collect, directly and indirectly, or otherwise process your personal data. The details include information on (i) the purpose itself, (ii) the legal basis of these processing activities, (iii) which categories of personal data are affected (see section 2.5 and 2.7 for further information on the categories) and (iv) categories of third parties that we share personal data with for the respective purpose. For further details on the third parties that we share your personal data with, please see section 4.

2. Purposes. We process your personal data for the following purposes:

a. **Analysing and improving performance of the functions of our Apps and all data capture solutions.**

i. **Description:** We process your personal data to analyze performance of our App's functions, such as the digitalization of characters from a physical object via the camera on your mobile device. This knowledge is used to develop and improve our Apps and our data capture technology in general, which forms the core of our business. This also covers the prevention and early correction of malfunctions, i.e. debugging.

ii. **Legal Basis:**

- **Contractual Obligations** (Art 6 para. 1 (b) GDPR): The processing of your data, which you provide as customer is carried out on the legal basis of fulfilling the contractual relationship with you by ensuring smooth performance of our Apps.
- **Legitimate Interest** (Art 6 para. 1 (f) GDPR): The processing of your data is carried out on the basis of our legitimate interest to develop, debug and enhance our software which forms the core of our business and keep a satisfactory relationship with potential customers and all other individuals using our Apps.

iii. **Data Categories:** We process the personal data set forth in section 2.7.

iv. **Third Parties:** For this purpose, we share personal data with the parties set forth in section 4 below.

b. **Managing our licenses.**

i. **Description:** We process your personal data to manage the licensing relationships we establish with you, when you use our App. Through this process, we identify who uses our Apps.

ii. Legal Basis:

- **Contractual Obligations** (Art 6 para. 1 (b) GDPR): The processing of your data, which you provide as customer is carried out on the legal basis of providing you with access to our Apps.

iii. Data Categories: We process the personal data set forth in section 2.5.

iv. Third Parties: For this purpose, we share personal data with the parties set forth in section 4 below

c. Analyzing your use of the Apps.

i. Description: We need to know why and for which purpose users use our Apps. This is in the interest of our shareholders, our board members, our employees, and our partners, as well as our users. We create data models for different analytical purposes and analyze using these data models how our Apps are doing, what are the popular features of our products, what works from a marketing and advertising perspective, our distribution strategy and overall user experience, so we can establish, implement, and evaluate our business strategy. This includes, for example, analyzing the usage data of our Apps or in order to understand how users interact with our Apps.

ii. Legal Basis:

- **Contractual Obligations** (Art 6 para. 1 (b) GDPR): The processing of your data, which you provide as customer is carried out on the legal basis of fulfilling the contractual relationship with you by ensuring smooth performance of our Apps.
- **Legitimate Interest** (Art 6 para. 1 (f) GDPR): The processing of your data is carried out on the basis of our legitimate interest to develop and market our software in the best possible way.

iii. Data Categories: We process the personal data set forth in section 2.5 and 2.7.

iv. Third Parties: For this purpose, we share personal data with [*]

4. Data transfers

- 1. General.** Due to today's complexity of certain data processing processes, it has become essential for us to provide certain services with the assistance of third parties. Thus, we may share your data with our affiliated companies and other third parties if this is necessary for the purposes listed in section 3, if we have to exercise or protect our rights and interests.
- 2. Selection of Providers.** Anyline strives to engage service providers based in the European Union or any country offering guarantees ensuring an adequate level of data protection essentially equivalent to that ensured within the European Union. We carefully select our service providers and oblige them to process personal data only in accordance with our instructions and applicable data protection provisions. If a service provider processes the data under its own responsibility, we take care to ensure that the transfer of personal data is kept to a minimum.
- 3. Categories of third parties.** Anyline shares personal data with a number of service providers, including providers for file hosting service, cloud services, web application for error management, problem handling and operational project management, statistical service providers, IT development and support providers, lawyers and tax advisors. Furthermore, we may share data with authorities (including courts). The third parties include, for example:

GOOGLE LLC	
Address	1600 Amphiteatre Parkway, Ca 94043, Mountain View, USA
Contact details	legal-notices@google.com

Description of the processing (including a clear delimitation of responsibilities in case several sub-processors are authorised)	Provision of cloud infrastructure for the operation of the ANY-LINE SDK for the development and improvement of SOLUTIONS
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IBM ÖSTERREICH INTERNATIONALE BÜROMASCHINEN GESELLSCHAFT M.B.H.	
Address	Obere Donaustrasse 95, 1020 Vienna, Austria
Contact details	gsc@at.ibm.com
Description of the processing (including a clear delimitation of responsibilities in case several sub-processors are authorised)	Provision of machine learning frame-works (Watson) for data processing and the training of neural networks within SOLUTIONS and for the operation of the ANYLINE SDK

INFOSEARCH BPO SERVICE PVT LTD	
Address	Peters Rd, Gopalapuram, Chennai, Tamil Nadu, 600086 India
Contact details	enquiries@infosearchbpo.com annotation services
Description of the processing (including a clear delimitation of responsibilities in case several sub-processors are authorised)	

ATLASSIAN, INC.	
Address	350 Bush Street, San Francisco, CA 94104, USA
Contact details	Head of Privacy, dataprotection@atlassian.com
Description of the processing (including a clear delimitation of responsibilities in case several sub-processors are authorised)	Provision of a service/ticket application (JIRA/Confluence) for the management of support requests and documentation

AMAZON WEB SERVICES EMEA SARL	
Address	38 Avenue John F. Kennedy, L-1855, Luxembourg
Contact details	AWS EMEA Legal https://aws.amazon.com/contact-us/compliance-support/
Description of the processing (including a clear delimitation of responsibilities in case several sub-processors are authorised)	Provision of the infrastructure for the deployment of mobile applications

WELD TECHNOLOGIES APS	
Address	Frederiksholms Kanal 4,1. 1220 Copenhagen, Denmark
Contact details	privacy@weld.app
Description of the processing (including a clear delimitation of responsibilities in case several sub-processors are authorised)	Platform and service provider tasked with consolidating multiple data sources into a state of the art data warehouse

GRAFANA LABS	
Address	29 Broadway, New York, USA
Contact details	privacy@grafana.com
Description of the processing (including a clear delimitation of responsibilities in case several sub-processors are authorised)	Metrics visualization

ELASTICSEARCH B.V.	
Address	Keizersgracht 281 1016 ED Amsterdam Netherlands
Contact details	info@elastic.co
Description of the processing (including a clear delimitation of responsibilities in case several sub-processors are authorised)	Search engine

QOVERY	
Address	128 rue de la Boétie, 75008 Paris, France

Contact details	goverly.com/contact
Description of the processing (including a clear delimitation of the responsibilities in case several sub-processors are authorised)	Service Orchestration

CLOUDFLARE, INC.	
Address	101 Townsend St, San Francisco, CA 94107 USA
Contact details	privacyquestions@cloudflare.com
Description of the processing (including a clear delimitation of responsibilities in case several sub-processors are authorised)	Security, abuse prevention

- 4. Transfer of personal data outside of EU/EEA/CH.** In certain cases, your personal data is processed outside of the EU, EEA and Switzerland. We only share your personal data with third parties outside the EU, EEA and Switzerland if (i) the third party is located in a country that provides an adequate level of data protection under Article 45 GDPR or if (ii) standard contractual clauses under Article 46 GDPR as well as appropriate safeguards are in place to protect your personal data and your rights related thereto. According to the decision "*C-311/18 – Facebook Ireland und Schrems*" the European Court of Justice has declared **that the data protection level in the US is inadequate**. Above all, there is a risk of your data being accessed by US authorities for control and surveillance purposes and there are no effective legal remedies to prevent this.

5. Retention of personal data

- Retention Period.** Personal data will be stored as long as it is required to fulfill the purposes listed in section 3. If certain personal data is no longer required for the purposes listed in section 3, e.g. because you don't use our Apps anymore, we will delete or anonymize this data within a reasonable time but in any case the earlier of (i) 3 years after the point in time when your personal data is no longer required for the purposes ("**Retention Period**") or (ii) your request to delete your personal data.
- Exceptions.** If you request deletion of your personal data or if we delete it after the Retention Period your personal data will be deleted by us, with the following exceptions:
 - personal data required for our performance of statutory obligations will not be deleted but reduced to the minimum necessary; and
 - personal data we need to defend against claims, that we need to enforce our claims or that we need to document our compliance with legal requirements will not be deleted for a period of 10 years but reduced to the minimum necessary.

6. Your rights as data subject

- Each data subject has a right to know which personal data is processed by Anyline. This means that you can address us anytime with your right to
 - be informed and gain access to your personal data;
 - rectification;
 - erasure ("*right to be forgotten*");
 - restrict processing;
 - data portability;
 - object to processing; and
 - the right to withdraw consent.
- For any questions and requests regarding your privacy rights please contact our data protection officer, at privacy@anyline.com.
- Kindly note that we are required to receive additional information in order to determine if you are authorized to submit a particular request and subsequently answer your request, since your personal data is pseudonymized.

4. If you believe that the processing of your personal data by Anyline does not comply with applicable data protection laws, please contact us immediately at privacy@anyline.com. Apart from that you may file a complaint with the Austrian data protection authority.

7. Changes to the privacy policy

1. **Changes.** We reserve the right to amend this Privacy Policy as necessary, due to changes resulting from our business operations or legal developments. The updated Privacy Policy will be available on our Website; please check the Privacy Policy regularly.
2. **Last Update.** This Privacy Notice was last modified on July 4, 2023.