

## Anyline Apps Privacy Policy

1. General information
2. Personal data processed by our Data Capture Solutions
3. Purpose of the processing and legal basis
4. Data transfers
5. Data storage
6. Your rights as data subject
7. Changes to the privacy policy

### 1. General Information

- 1.1. 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.
- 1.2. Purpose and Scope.** Anyline respects the privacy of its users and created this privacy policy ("**Privacy Policy**") 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 software applications we offer through distribution platforms for applications, such as Google's PlayStore or Apples App store and Web Apps / Instant Apps (the "**Data Capture Solutions**"):
- 1.3. 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*).
- 1.4. 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 our Data Capture Solutions

- 2.1. 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 a Data Capture Solution 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 locally.
- 2.2. 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.
- 2.3. 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:
- Name
  - Company Name
  - Contact details
  - Field of work
- 2.4. Unique identifier.** Personal data processed via our Data Capture Solutions 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.
- 2.5. Data processed during the use of our Data Capture Solutions.** Anyline will process the following personal data:
- IP address of device
  - Current location (approximation over IP-Address)
  - Unique identifier (see section 2.4)
  - Image of the scan (Photo you capture with your device)



Capture Opportunities

- Result of the scan, depending on the use case (e.g. if you scan a license plate, the license plate number will be recognized and processed).
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### 3. Purpose of the processing and legal basis

**3.1. General.** 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.

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

- a. **Analyzing and improving performance of the functions of our Data Capture Solutions.**
  - i. **Description:** We process your personal data to analyze performance of our Data Capture Solutions's functions, such as the digitalization of characters from a physical object via the camera on your device. This knowledge is used to develop and improve our Data Capture Solutions 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 when accepting our terms of use for Anyline Apps.
    - **Legitimate Interest** (Art 6 para. 1 (f) GDPR): The processing of some of your data is carried out on the basis of our legitimate interest to develop, debug and enhance our Data Capture Solutions which forms the core of our business and keeps a satisfactory relationship with potential customers and all other individuals using our Data Capture Solutions.
  - 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.
- b. **Managing our licenses.**
  - i. **Description:** We process your personal data to manage the licensing relationships we establish with you, when you use our Data Capture Solutions. Through this process, we identify who uses our Data Capture Solutions.
  - 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 when accepting our terms of use for Anyline Apps to provide you with access to our Data Capture Solutions.
  - 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.
- c. **Analyzing your use of our Data Capture Solutions.**
  - i. **Description:** We need to know why and for which purpose users use our Data Capture Solutions. 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 Data Capture Solutions 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 Data Capture Solutions or in order to understand how users interact with our Data Capture Solutions.

**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 when accepting our terms of use for the Anyline Apps to ensure smooth performance of our Data Capture Solutions.
- **Legitimate Interest** (Art 6 para. 1 (f) GDPR): Some 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 2.3 and 2.5.

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

#### 4. Data transfers

**4.1. 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.

**4.2. 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.

**4.3. 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).

**4.4. Transfer of personal data outside of EU/EEA/CH.** Your data is also processed, at least in part, outside the EU or the EEA. The adequate level of protection results from an adequacy decision pursuant to Article 45 of the GDPR and/or the conclusion of standard data protection clauses and additional security measures with the respective processors pursuant to Article 46(2)(c) and (d) of the GDPR.

#### 5. Retention of personal data

**5.1. 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, we will delete or anonymize this data within a reasonable time ("**Retention Period**").

**5.2. 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

**6.1.** 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;

**6.2.** For any questions and requests regarding your privacy rights please contact our data protection officer, at [privacy@anyline.com](mailto:privacy@anyline.com).

**6.3.** 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.

**6.4.** 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](mailto:privacy@anyline.com). Apart from that you may file a complaint with the Austrian data protection authority.

## **7. Changes to the privacy policy**

**7.1.** 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.

**7.2.** Last Update. This Privacy Notice was last modified on June 12, 2024.