

# Vasco Electronics devices privacy policy

---

This Policy explains how Vasco Electronics processes your personal data.

Personal data means any information in electronic or other form which, either alone or in combination with other data, may be used to identify an individual or to enable such identification.

We do not describe all the procedures for the services available on your device and therefore, before you start using a particular product or service, you are advised to read the privacy statement or published for that product or service to find out about the applicable processing of personal data.

This Policy applies to all Vasco Electronics products for private and home use including electronic translators. Some of its provisions, however, may not apply to some devices due to differences in functionalities available on different devices.

Some of the data processed on the devices may not be considered as personal data because the user cannot be identified from them (general data). Vasco collects statistical data in order to learn how users use its products and services. This allows us to improve our services to better meet user requirements.

## **I. Administrator details and contact details of the Administrator's representative**

The administrator of personal data is Vasco Electronics Spółka z ograniczoną odpowiedzialnością S. K. A. (Polish limited liability partnership) with its seat in Kraków at Aleja Pokoju 1, CTA/350, 31-548 Krakow, NIP 6772369151, hereinafter referred to as (Vasco, Vasco Electronics or Administrator).

## **II. Categories of data processed on device**

Vasco collects data related to your device and the exchange of information by you and your device with the Administrator's and related parties products and services. This information includes:

1. Device and application information such as device name, device identification code (IMEI, ESN, MEID and SN), device activation time, device model, operating system version, application version, software identification code and device and application settings (such as region, language, time zone and font size), phone number, serial number, sales code, access registration, current software version, country identification number (MCC), mobile network identification number (MNC), MAC address, IP address, cookies, subscription information and device settings used to access the Services.
2. Information on the use of the devices such as: access time, number of accesses, IP address and event information (such as errors, suspensions, restarts and updates to new versions) and other diagnostic, technical, error and usage information, such as the time and duration of use of the Services, the terms you enter on your device and any information stored in cookies placed on your device.
3. Location data. Vasco collects, uses and processes the approximate or exact location of your device when using location-based services (e. g. when searching for information, using navigation software or checking the weather in a particular location). Location data can be obtained on the basis of GPS and WLAN systems and the network identifier of the telecommunications service provider. To withdraw or deny permission to share location-related information, you can deactivate the permission to use your location for certain services in the device settings menu, which may affect the availability of certain application or device features.
4. E-mail address. In order to use certain functions or services, you need to register or log in with your email address.
5. User data. Some products allow users to communicate and exchange information with others. When you use Vasco Electronics products to share content with family and friends, you may need to create an ID containing certain information that will be disclosed in the public domain, including a pseudonym and possibly an avatar.
6. Third party data obtained from you. Vasco Electronics may process information related to the persons to whom you provide data from your device including, for example, their names, e-mail addresses and telephone numbers. Vasco Electronics will take appropriate and necessary measures to ensure the security of information obtained from users. It is the user's responsibility to make sure that the persons to whom he provides information have given their consent to provide this information to the Administrator.
7. Your voice information and voice recordings: Voice does not allow us to identify the owner and Vasco does not take action to do so. The recording is made when the user uses voice commands to translate spoken phrases. The provision of voice translation and speech transcription services is based on cooperation with external service providers offering speech to text conversion services on its behalf. Such a service provider may receive and store specific voice instructions in accordance with a contract between Vasco and a trusted third-party service provider.
8. The photo and the data contained therein obtained as part of the use by the User of the service available on the devices, which consists in making available by the User to another person a photo including the text entered by the User with an automatic translation. The photo is stored on Vasco Electronics' servers for 10 minutes and after

that time it is automatically and permanently deleted from the servers. If data of third parties are provided in this way, the User declares that he/she has all consents of these persons to provide such data, including personal data. All data entered by Users during the use of this service are the property of the Users and the Users are fully responsible for them. Vasco Electronics is not liable for the correctness or lawfulness of the data entered as part of the use of this service.

9. Cookies: Some of our devices use Cookies because of installed software or applications. These are IT data, usually text files, which are stored on the user's end device. They usually include the name of the website from which they come, the storage time and the number. More information about cookies is available at [https://en.wikipedia.org/wiki/HTTP\\_cookie](https://en.wikipedia.org/wiki/HTTP_cookie) or in the "Help" section of your web browser menu.

#### How to delete cookies in the default browser in Vasco Traveler Premium 7"

1. Start your Internet browser;
2. Press MORE (3 vertical dots);
3. Select Settings;
4. Go to Privacy and Security Section Cookies;
5. Find "Clear Cookies";
6. Confirm deletion by selecting OK.

#### How to delete cookies in the default browser in Vasco Traveler Solid

1. Start your Internet browser;
2. Press the MENU button (4 dots) on the device panel (item 6 in the device's operation diagram in the user's manual);
3. Select Settings;
4. Go to Privacy and Security Section Cookies;
5. Find "Clear Cookies";
6. Confirm deletion by selecting OK.

#### How to delete cookies in your default browser (Chrome) in Vasco Traveler Premium 5"

1. Start your Chrome browser;
2. In the top right corner click MORE (3 vertical dots);
3. Select "Go to Privacy Settings". Find the item Clear Browsing Data;
4. At the top, next to the option "Time Range" select a period, for example last hour or last day;
5. Check "Cookies and other site data". Mark all other items;
6. Click "Clear Data".

### **III. The purposes of the processing of personal data and the legal basis for the processing**

Vasco devices may use your personal data for the purposes of:

1. The provision, activation and verification of the services ordered or the application of changes and provision of technical support;
2. Sending you operating system and application updates and notifications about software installations;
3. Making personalized services and content available to users;
4. Conducting internal audits, data analysis and research; analyzing the efficiency of business operations and measuring market share; and improving Vasco products and services;
5. Synchronise, share and store data transmitted or downloaded by users and the data necessary to carry out the transmission or download operation;
6. Improving our damage and fraud prevention programmes;
7. Processing in accordance with applicable law, e. g. at the request of the state authorities;
8. Use for other purposes in connection with the provision of certain services or in connection with the consent of users.

The legal basis under which Vasco processes the data includes the processing that is:

1. Necessary so that we can meet our obligations towards you, e. g. provide you with Services (Art. 6 sec. 1 b) GDPR);
2. Required to ensure compliance with the law and legal procedures art. 6 ust. 1 lit. c GDPR;
3. Made upon your consent (art. 6 sec. 1 c) GDPR). You may always withdraw your consent by contacting us as set out below in the Privacy Policy;
4. Made upon legitimate interests pursued by the administrator or by a third party (art. 6 sec. 1 f) GDPR).

### **IV. Information on the recipients of personal data or categories of recipients**

We do not share personal data with other entities or persons except as described below:

1. Sharing upon consent: once we have received your consent to share your personal data, Vasco will provide certain other companies or categories of other companies with the information covered by your consent;

2. Sharing personal information within the scope of applicable law: We may share information, to the extent required by applicable law, for the purpose of resolving legal disputes or at the request of administrative and judicial authorities, in accordance with applicable law.
3. Sharing your information with affiliates: your information may only be shared with affiliates for clearly described and legitimate purposes, and such sharing is limited to information required in connection with specific services, for example to provide services to you.
4. Sharing with business partners: Some products or services are provided to users directly by our partners through which some of the services and applications installed on the device are provided. Vasco may also share your information with such partners and they may use it to provide you with the products or services you request, to anticipate your interests and to provide you with advertising, promotional and other materials. Most often these entities will ask the User to read and accept their Privacy Policy before starting to provide services.
5. Sharing with service providers: We may also share user data with companies that provide us with services related to our current operations. Examples of such service providers include companies, consultants, accountants, lawyers, programmers, etc.

We ensure the legality of the data sharing and sign strict confidentiality agreements or clauses on data processing with companies, organizations and individuals to whom we share personal data, ensuring that both parties comply with this policy and take appropriate measures to ensure confidentiality and security during data processing.

Websites, software, products and services may contain links to third-party websites, products and services. All links to third-party websites, products and services are provided solely for your convenience. The way and the rules for using them should be determined by the user. Before sharing your personal information to other companies you should read their privacy policy.

## **V. Information on the intention to transfer personal data to a third country or international organisation**

Some of our service providers are based outside the European Economic Area, but due to the type of services and the global scope of their operations they apply the highest global standards. We ensure the lawfulness of data processing with all service providers and sign strict confidentiality agreements or data processing clauses ensuring that both parties to the agreement comply with the relevant standards.

## **VI. Information on appropriate safeguard measures**

Vasco takes the following measures to protect your data and to prevent unauthorized access or disclosure, use, modification, damage or loss:

1. We take reasonable and feasible measures to collect only the minimum amount of personal data relevant and necessary for the purposes for which they are processed. We keep your personal data only as long as necessary for the purposes set out in this policy and in the product or service specific privacy information, unless an extension is required or permitted by law;
2. We use technologies, such as cryptographic techniques, to ensure the confidentiality of data during transmission. We implement proven security mechanisms to protect your data and the servers on which it is stored against attacks;
3. We use access control mechanisms to ensure that only authorised personnel have access to personal data. In addition, we limit the number of authorized employees and apply a hierarchical management of the authorization depending on the requirements of the position and level of the employee;
4. We carefully select business partners and service providers and integrate data protection requirements into business contracts, audits and evaluation activities;
5. We organise training, testing and information activities on security and privacy in order to raise awareness of data protection among our employees.

Despite the high level of care taken in protecting personal data, no security measures are perfect and no products, services, websites, data transmissions, computer systems or network connections are 100% secure.

## **VII. The period for which personal data will be stored and, where this is not possible, the criteria for determining this period**

We process data for the time necessary to provide services and use the equipment and its functions and for the time necessary to secure claims related to the performance of our duties. Information regarding the time of data processing by our Service Providers is specified in their privacy policies.

## **VIII. Children's personal data**

Our devices are designed for adults. If children's personal information is collected on the basis of the parental authority's consent, we use or disclose this information only in a way that is legally permitted, expressly authorised by the parental authority or necessary to protect the children in question. If you have parental authority and would like to access, modify or delete the personal information of your children or persons under your legal guardianship, you can contact us through the contact details provided in this Policy or on our website. If we become aware of

the processing of children's personal data without the consent of those who can prove that they have parental authority, we will delete the data immediately.

## **IX. information on the right to request the controller to access, rectify, erase or limit the processing of personal data concerning the data subject, or to object to the processing, as well as on the right to data portability**

You have the right of access to the content of the data, the right to request rectification, deletion, restriction of processing, the right to transfer data and the right to object to the processing.

For the exercise of these rights, you may apply:

- A) to the e-mail address - [gdpr@vasco-electronics.com](mailto:gdpr@vasco-electronics.com)
- B) by post to Krakowska Street 23, 32-065 Krzeszowice, Poland

In your application, please provide data that will allow us to identify you.

You may change the approved scope of the collection of personal data or withdraw their consent to the collection of personal data, but this does not affect the lawfulness of the processing of data resulting from this consent and taking place before its withdrawal.

Requests will be executed by deleting information, blocking related functions or setting up your privacy options. In some cases, this may limit your ability to use certain Services.

There are certain circumstances in which the Administrator is not obliged to comply with the request. The controller should delete the data as requested in the situation when:

- a) personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
- b) the data subject has withdrawn the consent on which the processing is based in accordance with art. 6 sec. 1. a) GDPR lub art. 9 sec. 2. a) GDPR and there is no other legal basis for the processing;
- c) the data subject shall file an objection pursuant to Article 21 sec. 1 GDPR and there are no overriding legitimate grounds for processing and no overriding legitimate grounds for processing or the data subject files an objection pursuant to Article 21 sec. 2 GDPR toward processing
- d) personal data was processed illegally;
- e) personal data must be deleted in order to comply with a legal obligation under European Union or it's Member State law to which the Administrator is subject;
- f) personal data have been collected in connection with the offer of information society services referred to in Article 8 sec. 1 GDPR to the application in whole or in part.

It may occur that although there are grounds for deleting personal data as requested by the data subject, further processing of the data to a certain extent will be necessary to achieve the purposes which justify the refusal to delete the data. These include cases where data are necessary:

- a) to exercise the right to freedom of expression and information;
- b) to fulfil a legal obligation requiring processing under EU law or the law of the Member State to which the Administrator is subject or to perform a task carried out in the public interest or in the exercise of public authority entrusted to the Administrator;
- c) on grounds of public interest in the field of public health pursuant to Article 9 sec. 2. h) GDPR and i) i art. 9 sec. 3 GDPR;
- d) for archival purposes in the public interest, for scientific or historical research purposes or for statistical purposes in accordance with Article 89 sec. 1 RODO in so far as the right to delete personal data is likely to make the purposes of such processing impossible or seriously impeded;
- e) to file, pursue or defend claims.

Some of the Services and applications on your device use data input, such as Speech and translation of text for scientific activities and the development of technology and software's ability to "learn" and continuously improve the available functions and the quality of translations. Consent to the processing of data for this purpose and scope is irrevocable and unlimited in time. The data collected is not used to identify the persons from whom they come.

## **X. Information on the right to file a complaint to a supervisory authority**

If you consider the processing of the data to be illegal, you have the right to file a complaint with the supervisory body dealing with the protection of personal data, i. e. to the President of the Office for Personal Data Protection (the Office's contact details are available at <https://uodo.gov.pl/p/kontakt>).