

Data protection notice

In this notice we, Knott GmbH, provide information in accordance with Arts. 13 and 14 of the [General Data Protection Regulation](#) (“GDPR”) on the processing of personal data in connection with the provision and operation of the **KNOTT app** (hereinafter: “the app”) within the framework of the use agreement concluded with you.

The terms used in this notice, such as “controller”, have the meaning defined in Art. 4 GDPR.

A. Name and contact details of the controller

The controller who provides and operates the app is:

KNOTT GmbH

Obinger Str. 15, 83125 Eggstätt, Germany

info@knott.de

+49 8056 906-0

(hereinafter “**KNOTT**” or “**we**” or “**us**”).

B. Contact details of our Data Protection Officer

Our Data Protection Officer is:

Ms Monika Kefer

Blumenstraße 9A, 83569 Vogtareuth, Germany

Tel: +49 8038-1039

Mobile: +49 160-94822279

info@kefer-it.de

C. Categories and sources of personal data

We process the following (categories of) personal data:

Categories of personal data processed	Types of personal data within this category	Source of the personal data <small>(including where applicable whether the source is publicly accessible)</small>
Registration data (Basic data provided upon registering a user account to use the app)	First name, surname, email address, account ID (unique ID) <u>Explanatory notes:</u> You have the option to register via the app using your first name and surname and a personal email address. You complete the registration process by providing your personal password. Your registration is confirmed in an email. When you confirm your email address by clicking on a link, your KNOTT user account is activated and an individually generated account ID (unique ID) is created.	The customer/user through information entered upon registration

<p>Trailer profile data (optional)</p> <p>(Data identifying the trailer type and supplementary information)</p>	<p>Trailer type, postal address, vehicle licence plate, images created by the customer/user and uploaded to the app, vehicle identification number, presence of an ETS Plus system, KNOTT products already purchased</p> <p><u>Explanatory notes:</u></p> <p>You have the option to store information on one or more trailers belonging to the categories car transporters, boat trailers, caravans, box trailers and horse trailers in a personal profile. You can add an individual name as an identifier for the trailer(s) to this so-called trailer profile. You also have the option to update your address, your vehicle licence plate and any KNOTT products already purchased.</p> <p>In addition, you can add images to this trailer profile by storing these via the mobile phone camera in the app.</p>	<p>The app customer/user him/herself through the voluntary, optional entry of information during the creation of his/her trailer profiles and, where applicable, editing of these trailer profiles</p>
<p>Location data</p>	<p>GPS location data</p> <p><u>Explanatory notes:</u></p> <p>The location data of the respective mobile end</p>	<p>The app customer/user him/herself when using the app.</p> <p><u>Please note:</u> There is an option to deactivate geolocation via your mobile end device by removing location access from the</p>

	device on which the app is installed is automatically detected via GPS positioning.	app.
ETS Plus status data (Data showing the functioning of the ETS Plus in real time)	The connection status (connected/not connected); technical status information such as braking interventions; the mechanical, electronic and IT functioning of the ETS; information on mechanical, electronic and IT problems (to assist with servicing).	The app customer/user him/herself when using the app.
ETS Plus fault memory data (Mechanical and electronic data for identifying safety risks)	Fault data on the IT, electronic and/or mechanical functioning of the system, such as over- or undervoltage in the energy supply, software version, correct installation of the ETS.	The app customer/user him/herself when using the app.
Telecommunications data	The app communicates in real time with the server via an SSL-encrypted connection.	The app customer/user him/herself when using the app.

D. Purpose and legal grounds for the processing of personal data

We process the (categories of) personal data (see Section C above) for the following purposes and on the basis of the following legal grounds.

If the processing is based on Art. 6 (1) (f) GDPR, we also state the legitimate interests pursued by us or a third party.

Purpose of the processing	(Categories) of personal data (For details on the respective categories, see Section C above)	Legal grounds for the processing	(Categories) of recipients (For details, see Section E below)
Provision and administration of (optional) user accounts as a feature of the app	Registration data	Performance of a contract (Art. 6 (1) (b) GDPR)	See Section E

<p>Locating KNOTT service partners in the regional area including information on specialist skills in the categories Premium, Mobile, Repairs and Parts and the level of service provided by the service partners.</p>	<p>Location data</p> <p>Trailer profile data (optional)</p>	<p>Performance of a contract</p> <p>(Art. 6 (1) (b) GDPR)</p>	<p>See Section E</p>
<p>Personalised service in service or repair cases by us or one of our European subsidiaries (EU incl. UK and Serbia). Personalised means that the specified categories of data can be used to tailor the customer or repair service to the respective customer's personal situation.</p>	<p>Registration data</p> <p>Trailer profile data (optional)</p>	<p>Legitimate interests</p> <p>(Art. 6 (1) (f) GDPR)</p> <p>Our interest lies in offering users of our ETS system the best possible user experience and hence an efficient service tailored to their specific trailer type and situation.</p>	<p>See Section E</p> <p>To the extent that an enquiry comes from a user in another European country, this data is shared where applicable with our respective European subsidiaries (EU incl. UK and Serbia).</p> <p>Contact details for our subsidiaries can be found in Appendix 1.</p>
<p>Customer information on the mechanical, electronic and IT status and real-time information on physical interventions by the ETS Plus system on the brakes.</p> <p>The customer can make this information accessible to service</p>	<p>ETS Plus status data</p>	<p>Performance of a contract</p> <p>(Art. 6 (1) (b) GDPR)</p>	<p>See Section E</p>

<p>partners in a service case.</p>			
<p>Provision of fault data in the app to provide the customer and/or – if the customer makes use of this feature – service personnel of service partners with detailed information on possible technical and/or electronic defects in the form of fault codes and to provide grounds for a repair or exchange of the ETS Plus.</p> <p>There is no automatic sharing of data with service personnel/service partners.</p>	<p>ETS Plus fault memory data</p>	<p>Performance of a contract (Art. 6 (1) (b) GDPR)</p>	<p>See Section E</p>
<p>Improving KNOTT’s internal customer management (internal business processes within KNOTT) through the statistical evaluation of the information on app customers/users. This data relates to the trailer types used and the associated detailed technical information on the product types installed. This information ultimately provides insights into new registrations, growth rates and user preferences.</p>	<p>Registration data Trailer profile data (optional)</p>	<p>Legitimate interests (Art. 6 (1) (f) GDPR): Our interest lies in offering users of our ETS system the best possible user experience and therefore aligning our internal customer management processes more closely with their needs and actual situations based on our users’ data.</p>	<p>See Section E</p>

Direct marketing via the sending of emails to the address entered by the customer upon registration or subsequently updated by him/her.	Registration data	<p>We use your registration data for marketing purposes only if you have expressly given us your consent to this (Art. 6 (1) (a) GDPR, Sec. 7 (2) Unfair Competition Act (UWG)) or where it is otherwise permitted by law (Sec. 7 (3) UWG).</p> <p>For information on how to withdraw your consent or object under Sec. 7 (3) UWG, see Section I, Points II and III, below.</p>	See Section E
Temporary processing on our servers to enable data transfer and hence use of the app and its features.	Telecommunications data	<p>Performance of a contract</p> <p>(Art. 6 (1) (b) GDPR)</p>	See Section E

E. Recipients of personal data

For the purposes described in Section D above, we share personal data with the following (categories of) **recipients**:

I. Internal recipients (recipients within the controller)

- ***Engineering & Development Department (Trailer Technology)***
- ***Customer Service Department***
- ***Sales Management (Trailer Technology)***

- *IT Department (in the event of problems or for maintenance (backup))*

II. External recipients (recipients outside the controller)

1. External recipients who receive personal data as controllers

Where a customer enquiry regarding services in other European countries is received, data is shared where applicable with the European KNOTT subsidiaries listed in **Appendix 1**.

2. External recipients who receive personal data as processors

The following recipients are contracted by us to process personal data:

- **Pat Adams & Company GmbH, Bordinghauser Weg 38, 58566 Kierspe, Germany, info@pat-adams.de**
- **Tim Burkhardt, Dipl. Informatiker (FH), Dr. Schwind-Straße 9, 97506 Grafenrheinfeld, Germany, mail@tim-burkhardt.de**

F. Transfers of personal data to third countries and/or international organisations

We intend to transfer personal data to the following third countries (**countries outside the EU**):

Third country/international organisation	Recipient (For details, see Section E above)	Existence/non-existence of an adequacy decision/appropriate or suitable safeguards
Republic of Serbia	<i>KNOTT Autoflex YUG. d.o.o.</i> <i>Novosadska 202, 21220</i>	This transfer of personal data is subject to standard data protection clauses under Art. 46 (2) (c) GDPR. You can obtain a copy of the standard data protection clauses from our Data Protection Officer (see Section B above for contact details).

	<i>Bečej, Srbija</i>	
	<i>www.autoflex.rs</i>	

G. Period for which personal data is stored

The period for which personal data is stored is set out below or is determined based on the following criteria:

(Categories) of personal data (For details on the respective categories, see Section C above)	Period for which personal data is stored/criteria for determining this period
Registration data	Deletion after the expiration of the contract unless there are statutory duties to retain it (e.g. under the German Commercial Code or Fiscal Code). In the latter case, the retained data is archived and not used for any other purpose. Users have the option to automatically remove all data entered by them from the Knott back end using a "Delete profile" function.
Telecommunications data	The IP address of the user's mobile telephone is not stored permanently.
All other categories of data	Deletion after the expiration of the contract or – to the extent provided for in the app – during the term of the contract through deletion by the customer him/herself as an option in the app or through the addition/amendment/deletion of an entered data element unless there is a statutory duty to retain it (e.g. under the German Commercial Code or Fiscal Code). In the latter case, the retained data is archived and not used for any other purpose.

We would like to emphasise that technical data in the categories **ETS Plus status data** and **ETS Plus fault memory data** is routinely stored as completely anonymised copies during the term of the contract and, where applicable, processed as aggregated data. This anonymised and aggregated data does not enable an individual natural person to be identified. In particular, this data can no longer be associated with the app customer/user, even indirectly.

H. Need or duty to provide personal data and the possible consequences if this data is not provided

The provision of the following personal data is provided for/stipulated by law or contract or required for the conclusion of a contract:

(Categories) of personal data (For details on the respective categories, see Section C above)	Need/obligation	Possible consequences if this data is not provided
Registration data	Required for the conclusion of the contract (use of the app)	Registration and hence use is not possible without the provision of this data, or a use agreement cannot be concluded.

I. Rights of data subjects

I. Access, rectification, erasure, restriction and data portability

In relation to the processing of personal data, you have the following rights:

- Right to be granted access to your personal data by us in accordance with Art. 15 GDPR
- Right to have your personal data rectified by us in accordance with Art. 16 GDPR
- Right to have your personal data erased by us in accordance with Art. 17 GDPR

- Right to have the processing of your personal data by us restricted in accordance with Art. 18 GDPR
- Right to data portability in accordance with Art. 20 GDPR

II. Right to object (including right to object to direct marketing under Sec. 7 (3) UWG)

You have the right to object, on grounds relating to your particular situation, at any time to the processing of personal data concerning you which is based on Art. 6 (1) (e) or (f) GDPR (see Section D above), including profiling based on those provisions, under Art. 21 (1) GDPR.

Where personal data is processed for direct marketing purposes (see Section D above), you have the right to object at any time to the processing of personal data concerning you for such marketing under Art. 21 (2) GDPR; this also includes profiling to the extent that it is related to such direct marketing.

In particular, you also have the right under Sec. 7 (3) UWG to object at any time to the use of your email address for direct marketing purposes without costs arising as a result, with the exception of transmission costs in line with the basic rates.

III. Right to withdraw consent

Where the processing is based on Art. 6 (1) (a) or Art. 9 (2) (a) GDPR (see Section D above), you have the right to withdraw the consent granted to the controller (see Section A above for contact information) at any time, without this affecting the lawfulness of the processing based on consent before its withdrawal.

IV. Right to complain to a supervisory authority

You have the right to lodge a complaint with a supervisory authority under Art. 57 (1) (f) GDPR.

Appendix 1: List of European KNOTT subsidiaries (EU incl. UK and Serbia):

Country	Recipient (For details, see Section E above)	Existence/non-existence of an adequacy decision/appropriate or suitable safeguards
Germany	Knott GmbH Obinger Straße 15 83125 Eggstätt	
United Kingdom	Knott-Avonride Ltd. Europa House Second Avenue Centrum 100 Burton upon Trent Staffs. DE14 2WF	
Italy	Knott S.p.A. Via Garganelli 18 40065 Pian di Macina	
Austria	Knott Handelsges. m.b.H. Rennweg 79-81 1030 Vienna	
Poland	Knott Sp. z o.o. Zdziechowice 100 63-011 Plawce	
Romania	Knott Frane Osii s.r.l.	

	Str. Balantei 4-6 Dobroesti, Ilfov	
Slovakia	Knott spol.s r.o. Dolná 142 900 01 Modra	
Czech Republic	Knott CZ, s.r.o. Nádražni 32/41 69301 Hustopecce	
Hungary	Autóflex-Knott Kft. Kadafalva-Heliport Hrsz.: 11751/1 6000 Kecskemét	
Republic of Serbia	KNOTT Autoflex YUG. d.o.o. Novosadska 202, 21220 Bečej, Srbija www.autoflex.rs	This transfer of personal data is subject to standard data protection clauses under Art. 46 (2) (c) GDPR. You can obtain a copy of the standard data protection clauses from our Data Protection Officer (see Section B above for contact details).