

## Data Privacy Statement EPIQ RADAR

This Data Privacy Statement applies to the use of EPIQ RADAR, a sensor product offered by Econolite Control Products, Inc. for detection of vehicles, pedestrians, and bicycles at intersections. General information about our handling of your personal data, the use of our website, as well as information about your rights as a data subject, is available in our Data Privacy Statement available at <https://www.econolite.com/privacy-policy/>. Personal data is data that can be used to personally identify you. Personal data may be collected in connection with selling EPIQ RADAR to you, controlling user access, and providing technical and administrative support. This Data Privacy Statement explains which data we collect and the purpose for which we use it.

### Data Processing Controller

#### Name and contact details of the controller

The data processing controller is:

**Econolite Control Products, Inc.**  
1250 N. Tustin Ave.  
Anaheim, CA 92807  
Email: [info@econolite.com](mailto:info@econolite.com)

We are not obliged to appoint a data protection officer and have therefore not appointed one. You can contact the above-mentioned contact details of the Controller at any time regarding data protection issues.

#### Key Information on Joint Responsibility within Econolite Control Products, Inc. and Econolite Group, Inc.

Econolite Control Products, Inc. is a wholly owned subsidiary of Econolite Group, Inc. Both companies are organized under the laws of the State of California, U.S.A. Our registered agent is CT Corporation. Econolite Control Products, Inc. may share contact information of customers and interested parties with Econolite Group, Inc., and its affiliated companies, as part of our business relationship (contractual or pre-contractual relationship according to Art. 6 Sect. 1 Sent. 1 lit. b GDPR). We and the affiliated companies are jointly responsible for the protection of your personal data (Art. 26 GDPR). To ensure that you can easily and reliably exercise your data protection rights within the scope of this joint responsibility, we have agreed with our affiliated companies that you can assert your data protection rights, not only against Econolite Control Products, Inc., but also centrally against Econolite Group, Inc.

#### Key Information on Joint Responsibility within Econolite Group, Inc. and PTV Planung Transport Verkehr GmbH

Econolite Group, Inc. and the respective subsidiary and PTV Planung Transport Verkehr GmbH and the respective subsidiary are joint controllers within the meaning of Art. 26 GDPR.

The purpose of the joint data processing is to cooperate closely together and offer each other's mobility products together under the brand of "Umovity". PTV Planung Transport Verkehr GmbH processes data of customers, business partners and prospective customers of Econolite Group Inc. ("Customer Data"), each at least partially by means of centralized IT systems operated by PTV Planung Transport Verkehr GmbH.

It was also agreed that each party would be solely responsible for the data processing it carried out, i.e. it would independently assume all rights and obligations arising therefrom, including the processing of data subjects' rights. With respect to transfers of personal data to countries outside the European Union/European Economic Area for which there is no adequacy decision by the EU Commission, the

agreement of additional data protection measures - where necessary - will be part of the agreement in addition to the current EU standard contractual clauses.

Where it is apparent that a party controls and carries out the processing in question, data subjects may contact that party directly by using the contact options specified and published in each case. However, data subjects may exercise their rights under Art. 15 to 22 of the GDPR against any of the joint controllers

## Processing of Personal Data

### Operation of EPIQ RADAR

The EPIQ RADAR product does not store any personal data during product operation. Furthermore, EPIQ RADAR does not collect any personal data according to Art. 4 No. 1 GDPR about pedestrians, individuals operating vehicles, bicycles, or operators of other modes of transportation, detected by the product.

#### EPIQ RADAR Sensor (ITR-3800\_ECO)

The EPIQ RADAR sensor does not process any personal data.

The integrated video camera within the EPIQ RADAR sensor is solely used for live visual validation of the coverage area and roadway objects. The video stream is not recorded or stored. It is only streamed in real time when activated, displayed alongside the radar view for verification purposes and is activated only upon request within the Traffic Manager application. The Traffic Manager application also provides a configuration setting that allows users to completely disable the camera, if desired.

The camera is fixed focus with no zoom. Also, it is fixed in the housing of the radar sensor, hence no panning or tilting.

#### EPIQ RADAR Hub

The EPIQ RADAR Hub stores object list data and event log data generated by the radar sensors. The Hub retains only the most recent 400,000 lines of event log data at any given time. Event log data is not personal data within the meaning of Art. 4 No. 1 GDPR.

### Technical Support

To provide technical and warranty support, we collect

- customer name,
- address,
- telephone number and
- email address.

To be able to link the data of the same user, we assign an anonymous technical key as a user ID. The key does not allow any inferences to be made regarding the person, organization, or location.

As a user, you can track in detail what data is being collected at any time. To do this, activate the corresponding file output in the user settings.

Any gathered data is saved in an internal Econolite database, which only selected employees can access. There is no merging with other data of yours or with third-party data. This also applies specifically to data that you provide to our support team as part of a support request.

Based on the data collected, we may not be able to determine the best means of support. Therefore, the collection of data in no way replaces communication between our support team and our customers.

### Online Help

We offer you web-based online help, to which our general Econolite Data Privacy Policy applies.

The use of online help can be statistically evaluated. This is done primarily with cookies and so-called analysis programs. Your data will be processed according to Art. 6 Sect. 1 Sent. 1 lit. a GDPR (consent) and § 25 Sect. 1 TDDDG ([Telekommunikation-Digitale-Dienste-Datenschutz-Gesetz](#)). The analysis of your use is usually anonymous and cannot be traced back to you. You may object to this analysis or prevent it by not using certain tools.

For details, please refer to the "Analysis Tools" section of our general Data Privacy Statement. There you can also read about the possibilities of objection according to Art. 7 Sect. 3 Sent. 1 GDPR.

### License Activation

The Traffic Manager requires a license key to activate the application. License activation data is stored only as long as is necessary and is deleted regularly and may consist of the following data:

- IP addresses
- Traffic Manager version

Your data will be stored according to Art. 6 Sect. 1 Sent. 1 lit. b GDPR (contractual or pre-contractual relationship) or Art. 6 Sect. 1 Sent. 1 lit. f GDPR (legitimate interest). The legitimate interests lie in ensuring the functionality of the service and the security of our information technology systems. The data will be stored only as long as it is necessary and will be deleted regularly.

### Transfer of Personal Data to an EEA Foreign Country

The following applies to EEA/EU citizens:

Personal data may also be processed outside the EEA (European Economic Area) and thus in so-called third countries, especially in the USA.

For the USA, there is an EU adequacy decision in accordance with Art. 45 Sect. 1 GDPR, which certifies that the USA has an adequate level of data protection, which means that data transfers to the USA are generally permitted. The prerequisite for this is that the third-party providers from the USA have each certified themselves under the EU-U.S. Data Privacy Framework (DPF). This means that data transfers to these third-party providers are permitted without further ado.

All companies for which a third country transfer is considered and which (could) transfer personal data to a third country for which there is no EU adequacy decision or US companies that have not certified themselves under the EU-U.S. Data Privacy Framework (DPF) have concluded a binding agreement on the EU Standard Contractual Clauses (SCC, cf. Art. 46 Sect. 2 lit. c GDPR) with us and by agreeing additional data security measures, they have provided sufficient guarantees for data transmission in accordance with the GDPR and the European Court of Justice and have submitted to a level of regulation that is fundamentally comparable to the EU level of data protection. The transfer of data to these companies is therefore generally permitted (see Art. 44 ff. GDPR).

Furthermore, in the case of processing on behalf of a controller, corresponding data processing agreements (DPA) have been concluded with these companies.

## Rights of the Data Subjects

### Right to Deletion

Data subjects have the right to demand the immediate erasure of their personal data if one of the requirements of Art. 17 GDPR is met. You can contact us by post or email to exercise this right.

Notwithstanding your right to deletion, Econolite shall delete all user data within 8 weeks after terminating the contractual relationship. If Econolite is obligated by legal data storage requirements to retain the user's data (e.g. invoice and contract data), Econolite will block this data from further processing.

### Right to Information

Pursuant to Art. 15 GDPR, data subjects may at any time request information on the personal data stored by Econolite on them or their pseudonym. Requests for information can be addressed to:

**ATTN: Legal Department**  
**Econolite Control Products, Inc.**  
1250 N. Tustin Ave.  
Anaheim, CA 92807  
E-Mail: [legal@econolite.com](mailto:legal@econolite.com)

### Right to Log a Complaint with the Competent Supervisory Agency

In the event of violations of the GDPR, data subjects are entitled to log a complaint with a supervisory agency, in the member state where they usually maintain their domicile, place of work or at the place where the alleged violation occurred. The right to log a complaint is in effect regardless of any other administrative or court proceedings available as legal recourses. You can also contact us directly at [legal@econolite.com](mailto:legal@econolite.com).

### Further Rights as a Data Subject

A complete list of all data subject rights can be found in Econolite's Data Privacy Statement found at <https://www.econolite.com/privacy-policy/>.

### Voluntary Nature of the Provision of Data

If the provision of personal data is required by law or contract, we will always point this out when collecting the data. In some cases, the data collected by us is required for the conclusion of a contract, namely if we would otherwise not be able to fulfill our contractual obligation to you, or not sufficiently. You are under no obligation to provide the personal data. However, failure to provide it may mean that we are unable to perform or offer a service, action, measure or similar requested by you or that it is not possible to conclude a contract with you.