

# Data protection information for dashcam systems at Thermotraffic GmbH

## Information about the processing of your data in accordance with Art. 13 of the General Data Protection Regulation (GDPR)

### 1. Controller and data protection officer

#### **The controller who is responsible for data processing is:**

Thermotraffic GmbH  
Im Industriegelände 60–66  
33775 Versmold  
Germany  
Telephone: 05423 968 0  
Email: [info@thermotraffic.de](mailto:info@thermotraffic.de)

#### **Contact details of the data protection officer:**

Thermotraffic GmbH  
Mr Michael Jakob  
Im Industriegelände 60–66  
33775 Versmold  
Email: [compliance@thermotraffic.de](mailto:compliance@thermotraffic.de)

The contact details can also be found on our homepage at  
<https://www.thermotraffic.eu/privacy-policy/>

### 2. What data is processed?

Your personal data may be processed in the context of dashcam recordings. Specifically, this could concern the following data:

- Image and video data of streets and, in the region to the side, possibly buildings in public spaces as well as people staying in them (e.g., road users, pedestrians, uninvolved third parties, minors).
- Car + licence plate

### 3. For what purpose and on what legal basis is my data processed?

The data is processed on the basis of Art. 6 (1) f) GDPR.

Specifically, this concerns the following interests/purposes:

- Recording of accidents and safety-related events.

- Relieving of drivers in the event of accidents or other incidents.
- Protection of vehicles against vandalism or theft.
- If necessary, pursuit and defence of legal claims.

### 4. Are there any other recipients of the personal data besides the controller?

Within our company, only those persons and departments who need your personal data in order to fulfil our contractual and legal obligations will receive it.

The following bodies may receive your data in addition:

We obtain the specified services from Samsara Deutschland GmbH, Mühldorfstraße 8, 81671 Munich. This is a processor within the meaning of Art. 4 (8) GDPR. A contract for commissioned data processing within the meaning of Art. 28 GDPR has been concluded with the service provider.

### 5. How long will the data be stored?

The recordings made while the dashcams are in use are stored on SSD hard drives installed in the dashcams. The storage period is usually 40 hours after recording.

The dashcams are configured to automatically upload video footage to a secure, encrypted, Amazon Web Services ("AWS") cloud entity (the "Cloud Entity") based in the EU in just two types of situation.

The storage period in this case is a maximum of 3 days.

Deviations from the storage period may occur if they are required in order to assert legal claims (e.g., preservation of evidence in the event of an accident).

## **6. Data transfers to third countries or international organisations**

As already mentioned under point 4, our dashcam system is provided by the service provider Samsara Deutschland GmbH. This company also has a registered office in the USA, which, according to the current legal situation, is a third country within the meaning of Art. 44 GDPR. Your data is transmitted on the basis of an adequacy decision (Trans-Atlantic Data Privacy Framework) between the EU Commission and the USA in accordance with Art. 45 (1) GDPR. For more information, please contact us.

## **7. . Rights of data subjects**

### **a. Right of access**

You may request information about personal data of yours that we process in accordance with Art. 15 GDPR.

### **b. Right to object:**

You have the right to object at any time, on grounds relating to your particular situation, to the processing of personal data of yours that is carried out on the basis of Art. 6 (1) f) GDPR. The controller will then no longer process the personal data unless it can demonstrate compelling legitimate grounds for the processing which outweigh the interests, rights and freedoms of the data subject, or the processing serves the purpose of enforcing, pursuing or defending legal claims. The collection of data in order to make the website available and the storage of log files are absolutely necessary for the operation of the website.

### **c. Right to rectification**

If the information concerning you is not (or no longer) correct, you can request rectification under Art. 16 GDPR. If your data is incomplete, you can request that it be completed.

### **d. Right to erasure**

You may request the deletion of your personal data in accordance with Art. 17 GDPR.

### **e. Right to restriction of processing**

You have the right under Art. 18 GDPR to request that the processing of your personal data be restricted.

### **f. Right to lodge a complaint**

If you believe that the processing of your personal data violates data protection law, then, under Art. 77 (1) GDPR, you have the right to complain to a data protection supervisory authority of your choosing. This also includes the data protection supervisory authority responsible for the controller: the North Rhine-Westphalia State Commissioner for Data Protection and Freedom of Information (LDI NRW), <https://www.ldi.nrw.de/kontakt/ihre-beschwerde>.