

Consignor Privacy Policy

Scan App Pro

Version 1.0

In force from 08.12.2020

Consignor respects your privacy. Scan App Pro offer parcel delivery functionality, route planning and fleet management to customers using the Scan App Pro mobile application. When you use our services, you are trusting us with your information. We understand the responsibility, we put hard work to protect your information and we provide the possibility to update or anonymize your entire data whenever you want to stop using our services.

This policy explains what, how and why we collect information when you are using Scan App Pro. It also explains the specific ways we use and disclose that information. We fully respect all wishes for confidentiality of personal information that is disclosed via Scan App Pro, and we are aware of the need for appropriate protection and management of any personal information that we receive. Your use of the Scan App Pro is subject to the [Consignor Terms of Use & Data Processing Agreement](#) and indicates your consent to them.

To use our Services, you must be 16 years of age or older. If you are under 16, you may not use Scan App Pro.

In this Privacy Policy, the term “personal information” means information which you provide to us which personally identifies you, such as your name, email address or phone number, and, in certain circumstances, your location and route information or other data which can be reasonably linked to such information by Scan App Pro.

You can adjust in the Scan App Pro which personal information we may collect about you by enabling or disabling Live Tracking and Event Location features.

1. Definitions

The current policy is based on the following definitions:

Term	Definition
We, us, Consignor	All Consignor entities.
You	A person who use Scan App Pro
Personal data	Any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, identification number, location data or an online identifier.
Processing	Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organising, structuring, storing, adapting or alteration, retrieving, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
Consent	Any freely given, specific, informed, and unambiguous indication of your wishes by which you, by a statement or by a clear affirmative action, signify agreement to the processing of personal data relating to you.
Data Controller	The party that determines the purposes and means of the processing of personal data.
Data Subject	The person to whom the personal data relates.
Data Processor	Another entity, which processes personal data on our behalf.

2. Scope

This policy applies to our processing of any personal data when using Scan App Pro.

3. Legal basis for processing of the personal data related to you

Our processing of your account information is based on contract as this is information that we collect to provide services to you. Other information that you choose to share with Scan App Pro is based on your consent when choosing the features.

You may at any time withdraw your consent.

4. Contact information

Consignor Group AS
Rådhusgata 5
0151 Oslo
Norway

Organization number: 979 306 725

E-mail: DataProtectionOfficer@consignor.com

5. Data Protection Officer

We have appointed a data protection officer that you may contact if you have any questions or concerns regarding the processing of your personal data. You can reach the data protection officer by sending an e-mail to:

DataProtectionOfficer@consignor.com.

6. Information collected

Scan App Pro collects information to offer a better service for the users of the Consignor platform. This range from displaying the Event Location when you are sending events like Pick-Up or Delivered, to more complex things like finding the best route for your deliveries or Live Tracking where your manager can see where you are and can assist you with sending additional orders or traffic information. The information Scan App Pro collects, and how that information is used, depends on how you choose to use our app features and how you manage them in the app.

Personal Data you create or actively provide to us:

- A. **Account information:** Information required when setting up an Account, such as your name, email address or phone number. Please keep in mind that false, incorrect, or outdated information may prevent us from contacting you when necessary. Scan App Pro will explicitly indicate the fields for mandatory completion during your account creation. If you do not enter the requested data in these fields, you will not be able to register your Account and use the app.
- B. **Information that you choose to share with Scan App Pro:** Information that you may choose to share with us are referring to pictures you choose to upload in the app, location of your device or contact information of a fellow driver you want to invite to use our app.

7. Use of personal data

You have the right at any time to receive and get access to the personal data stored regarding your person and to have incorrect data deleted or rectified. You can contact us at any time if you have questions about the handling of your personal data or if you wish to request the correction of personal data stored by us. See the Questions and Complaints guidance below.

Scan App Pro may use information collected from or provided by you for the following purposes:

Provide our services

We use your information to deliver our services. For example:

- Use your camera for scanning barcodes and take pictures as proof of delivery or document the cases in which the parcel got damaged. Additionally, you can choose to upload an already existing picture from your local storage.
- Use your location to provide navigation services, optimized route planning and make available the necessary information to your manager about the current status of the delivery route.
- If you have chosen to use the Invite Agent feature, we use the selected contact information (name and phone number) which is stored in your device's phone book to create a new invite for that contact.
- If you chose to use Route Planning feature and want to contact the receivers upfront to let them know the estimated delivery time, we use the Phone app to facilitate the call.

Maintain and improve our services

- We also use your information to ensure our services are working as intended, such as tracking outages or troubleshooting issues you report to us. And we use your information to improve the service or to develop new features or services.

Measure performance

- We use anonymized data for analytics and measurement to understand how our services are being used. For example, we analyze data about your usage for optimizing the product performance.

To protect our users, the receivers and for Legal reasons

- To comply with any applicable law and assist law enforcement agencies under any applicable law, when Consignor has a good faith belief that Consignor's cooperation with the law enforcement agencies is legally mandated or meets the applicable legal standards and procedures.
- To detect abuse and illegal activity; to detect and prevent fraud, misappropriation, infringements, identity theft and other illegal activities and misuse of the app.
- To handle breakdowns and malfunctions.
- To take any action in any case of dispute, or legal proceeding of any kind between you and Consignor, or between you and other users or third parties with respect to, or in relation with Consignor.

8. Controlling your personal information

You can always review and update certain information in Scan App Pro by visiting the Agent screen from in-app left menu (such as your phone, name, photo and more).

If you find that the information associated with your Account is not accurate, complete, or updated, then you should make all necessary changes to correct it. Please keep in mind that false, incorrect, or outdated information may prevent you from using your account.

Privacy controls

At any time, you can change your privacy related to GPS location by disabling the Live tracking from in-app drawer menu or the Event Location from in-app Preferences, under Settings menu. You can also change or remove any consent related to required permissions from your device settings.

Deleting your information

If you would like to delete your account, please use the "Delete Account" functionality available under the in-app Preferences, under Settings page. When using this feature the account information will be anonymized and the account will no longer be available.

9. Scan App Pro data retention

Some of the data and account information is managed through self-service and some is automatically deleted. This section describes the data we store for different periods of time.

- **Data that expires after a specific period** - we keep your last GPS location from Live Tracking feature for 24h, after that time frame, it's being deleted automatically from our systems.
- **Information managed through self-service** - Account information like e-mail or phone, pictures, or other information you have provided can be updated at any time.
- **Information retained until your account is being deleted** - all your account information (name, e-mail, phone, pictures, event location and other information you have provided).

10. Information Security

We take reasonable and appropriate measures to protect personal data from loss, misuse and unauthorized access, disclosure, alteration, and destruction, considering the risks involved in the processing and the nature of the personal data. Read more about Data Security in Consignor here: <http://www.consignor.com/data-security>.

In the event of a personal data breach, we will notify the supervisory authority without undue delay and no later than 72 hours after having become aware of the breach, unless the breach is unlikely to cause a risk to the rights and freedoms of you or any of our users and subscribers. Moreover, if the breach is likely to cause a high risk to your rights and freedom, we will notify you without undue delay with at least:

- The name and contact details of the Data Protection Officer or other relevant contact point,
- A description of the likely consequences of the breach, and
- A description of the measures we have taken to address the breach.

Information security and protection of customer data is a top priority at Consignor. Consignor meets the obligations set out in the EU General Data Protection Regulation (GDPR). The regulation addresses how Consignor collects, process, use and protect personal data.

Consignor implements systems, applications, and procedures to secure your personal information, to minimize the risk of theft, damage, loss of information, or unauthorized access or use of information. For example, we review our information collection, storage, and processing practices, including physical security measures, to prevent unauthorized access to our systems. In addition, we restrict access to personal information to Consignor employees, contractors, and agents who need that information to process it.

11. Questions and complaints guidance

If you have comments, questions, concerns or objections related to our information and/or handling of your personal data or want to access, update, change or delete any of your personal data, please visit our [Data Security Page](#) or contact us. Our contact details can be found in section 4.

12. Complaints to a supervisory authority

If you are of the opinion that we process or have processed your personal data unlawfully, you may lodge a complaint with the Norwegian Data Protection Supervisory Authority (Datatilsynet) or the supervisory authority of your country of nationality.

Contact details to the Norwegian Data Protection Supervisory Authority (Datatilsynet) can be found here: www.datatilsynet.no.

13. Changes

We may change and update this Privacy Policy from time to time. All updates and amendments are effective immediately upon notice, which we may give by any means, including but not limited to, posting a revised version of this Privacy Policy on our website(s).

Consignor does not sell, rent, or lease your personal information to third parties.