

VTS GROUP PRIVACY POLICY

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TABLE OF CONTENTS

1. DEFINITIONS	4
1.1. Personal data	4
1.2. GDPR	4
1.3. websites	4
1.4. mHMI application	4
1.5. ClimaCAD OnLine 4 (CCOL4)	4
1.6. Online Shops	4
1.7. Recuperators	5
2. Who processes your data?	5
3. Why do we process your data?	5
3.1. reasons for processing your data:	5
4. What data do we collect and process?	6
4.1. The main categories of data that we may collect and process:	6
4.2. source of Data	8
4.3. Age restrictions	8
5. How long do we store your data?	8
5.1. Processing period	8
5.2. Data storage in applications and Online Shops	8
5.3. Data deletion	8
5.4. Additional rules for marketing functions	8
6. Who do we share your data with?	8
6.1. Internal disclosure of data	8
6.2. VTS Group	9
6.3. Third-party service providers	9
6.4. Marketing and analytics service providers	9
6.5. Payment service providers	9
6.6. Law enforcement agencies, supervisory authorities and others	9
6.7. Data transfer within Online Shops	9
6.8. Other data recipients	10
7. Do we transfer your data outside the EEA?	10
7.1. Basis for transferring data outside the EEA:	10
7.2. Data security principles:	10
7.3. Access to data by external entities:	10
8. How do we ensure data security?	11
8.1. Technical and organisational safeguards:	11

VTS GROUP PRIVACY POLICY

8.2. Encryption and payment protection:	11
8.3. Third-party service providers:	11
8.4. Links to third-party websites:	12
9. Communication and marketing	12
9.1. Service-related communication	12
9.2. Surveys including satisfaction surveys	12
9.3. Communication in response to your enquiries	12
9.4. Marketing communication	12
10. Profiling	12
11. Your rights	13
11.1. Your rights	13
11.1.1. Right of access to data	13
11.1.2. Right to rectification	13
11.1.3. Right to restrict processing	13
11.1.4. Right to object	13
11.1.5. Right to erasure ('right to be forgotten')	13
11.1.6. Right to data portability	13
11.1.7. Right to withdraw consent	13
11.2. How to exercise your rights	14
11.3. Fulfilling your requests	14
11.4. Complaint to the supervisory authority	14
12. Contact	14
13. Changes to the Privacy Policy	14
PART A	15
WEBSITES	15
1. When you browse content on our Websites, including as a guest	15
2. Placing orders	16
3. Scope of data collected	16
4. Types of cookies	16
5. Marketing and analytical tools used	16
6. Cookie banner and consent management	17
7. Location data	17
8. Data retention period	17
9. Purposes and grounds for processing cookie data	18
mHMI APPLICATION	18
1. Scope of data collected in the Application	18
2. Voluntary provision of data	19

3. Data retention period.....	19
ONLINE SHOPS.....	20
1. Registration and account management in Online Shops	20
2. Payments in Online Shops	20
RECUPERATORS.....	22
1. Scope of data collected.....	22
2. Voluntary provision of data	22
ClimaCAD OnLine 4 (CCOL4)	23
1. Voluntary provision of data	23
2. Data retention period.....	23
PART B	24
HANDLING OF REQUESTS AND CONTACT FORMS.....	24
1. Contact forms and chat:	24
2. Contact by telephone or e-mail:	24
ANALYSIS AND IMPROVEMENT OF SERVICE QUALITY.....	25
1. Scope of data collected for analysis and service improvement	25
2. Contact for satisfaction surveys	25
3. Communication analysis and recordings	25
MARKETING AND COMMERCIAL COMMUNICATION	26
1. Scope of data collected for marketing purposes	26
2. Forms of marketing communication.....	26
3. Establishing and maintaining business relationships	26
4. Option to opt out of marketing communications	26
5. Newsletter and advertising materials	26
PROMOTIONAL campaigns AND COMPETITIONS	27
LEGAL, TAX AND ACCOUNTING PURPOSES	27
SOCIAL MEDIA.....	28

VTS GROUP PRIVACY POLICY

By using the website www.vtsgroup.com and the services offered by VTS Group companies, you entrust us with your personal data. We want you to know why and how we process it, what your rights are and how we ensure its security.

In this policy, we explain:

- Who the controller of your data is,
- What data we collect and for what purpose,
- On what legal basis we process data,
- How long we store it,
- How you can exercise your rights.

Protecting your privacy is our priority, which is why we make every effort to ensure that data processing complies with applicable regulations, including the GDPR. If you have any questions, you will find our contact details and the details of the Data Protection Officer at the end of this document.

1. DEFINITIONS

1.1. PERSONAL DATA

Personal data is any information about you that allows you to be identified, either directly (e.g. name, surname, e-mail address) or indirectly (e.g. information about your activity on the website or in the application). A full list of the data processed can be found in section 4.

1.2. GDPR

GDPR is Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, which regulates the rules for the protection of personal data in the EU. GDPR imposes specific obligations on us in relation to the processing of your data and guarantees the exercise of your rights. You can find more information about your rights in Chapter 11.

1.3. WEBSITES

Websites include, among others, the website available at [https://vtsgroup.com/](https://vtsgroup.com) and all other platforms and tools offered by VTS Group companies through which we provide our services and collect user orders.

1.4. mHMI APPLICATION

A web and mobile application that allows remote control of VTS smart devices. It allows you to manage connected devices, including controlling their operation, modifying automation settings and monitoring technical parameters. Full information about the data collected and how it is used can be found in the Appendix in Part A.

1.5. CLIMACAD ONLINE 4 (CCOL4)

A web application for selecting ventilation and air conditioning units, certified by Eurovent. It allows you to create designs by integrating with CAD and REVIT tools as well as CRP, ERP and WMA systems. The application is available from any device with a web browser at <https://vtsgroup.com/pl/climacad>. For more detailed information on the functionalities of ClimaCAD OnLine 4, please refer to the Appendix in Part A.

1.6. ONLINE SHOPS

Online Shops are available at the following addresses:

- <https://eshop.vtsgroup.com/> - sales are conducted by VTS Plant sp. z o.o.; and
- <https://eshopahu.vtsgroup.com/> - sales are conducted by VTS sp. z o.o.

Through the Online Shops, it is possible to purchase products offered by companies from the VTS Group. More detailed information about the functionality of the shops can be found in the Appendix in Part A.

1.7. RECUPERATORS

The website (<http://www.homer-ventilation.com/>) is used to obtain information about recuperators offered by VTS and to contact the company via a dedicated contact and service form.

The HOMER Connect mobile application allows you to connect and operate recuperators via Bluetooth technology or a wireless local area network (WLAN). The application allows you to control the operating modes of recuperators, view operating parameters and access information on the operation of recuperators.

For more detailed information on the processing of personal data, please refer to the Appendix in Part A.

2. WHO PROCESSES YOUR DATA?

- 2.1. Depending on the type of service provided, the controller of your data is the relevant company from the VTS Group ("Controller"). Detailed information on this subject can be found in the Appendix to the Privacy Policy.
- 2.2. For users of the website <https://vtsgroup.com/>, the Controller of personal data is VTS sp. z o.o. with its registered office in Gdańsk.
- 2.3. For users placing orders via the website <https://vtsgroup.com/>, the Controller of personal data is VTS Polska sp. z o.o. with its registered office in Warsaw.
- 2.4. For users of the mHMI and ClimaCAD OnLine 4 (CCOL4) applications, the Controller of your personal data is VTS sp. z o.o. with its registered office in Gdańsk.
- 2.5. For users of the Online Shop available at <https://eshop.vtsgroup.com/>, the Controller of personal data is VTS Plant sp. z o.o. with its registered office in Gdańsk.
- 2.6. For users of the Online Shop available at <https://eshopahu.vtsgroup.com/>, the Controller of personal data is VTS sp. z o.o. with its registered office in Gdańsk.
- 2.7. For users of the website <http://www.homer-ventilation.com/> and the HOMER Connect mobile application for recuperators, the personal data controller is VTS Plant sp. z o.o.

3. WHY DO WE PROCESS YOUR DATA?

We will use your data for various purposes, but only when justified. By using our websites, applications, services, and shopping platforms, you accept the purposes of processing your data, which we present below:

3.1. REASONS FOR PROCESSING YOUR DATA:

- **Performance of a contract:**
We process your data in order to conclude and perform a contract for the provision of services (e.g. use of our Websites, Mobile Application, Web Applications, website or mobile application related to Recuperators, or conclusion of sales contracts in Online Shops). This allows you to use our solutions and us to provide them in a proper and effective manner.
- **Legal obligations:**
We fulfil our obligations under the law, including in the areas of taxation, accounting and data security.
- **Access to services:**
We process data to enable you to use the available functionalities of our Websites, Applications, website or mobile application related to Recuperators and Online Shops – including account registration, logging in, viewing content, modifying settings and contacting us via forms, chat, e-mail or telephone.
- **Participation in promotions:**
We provide you with the opportunity to participate in competitions, lotteries and promotions organised by us.
- **Newsletter and communication:**
We process your data so that you can receive our newsletter and other marketing information, thanks to which you will be up to date with our offer, news and promotions.
- **Contacting us:**

VTS GROUP PRIVACY POLICY

We enable you to contact us directly through various channels, such as forms, chat, e-mail, letter or telephone, which allows us to respond to your enquiries and support you in using our services.

- **Service development:**

We analyse your activity in order to continuously develop our services and improve their quality and comfort of use of our Websites, Applications, webpage or mobile application related to Recuperators and Online Shops.

- **Opinions and satisfaction surveys:**

We want to know your opinion about our services and products – this may mean contacting you with a request to participate in a satisfaction survey.

- **Security:**

We process your data to ensure the security of our services and to protect our rights and the rights of our customers.

- **Claims and defence:**

In some cases, we use data to pursue our claims or defend ourselves against claims, which is necessary to protect our legal and economic interests.

- **Marketing:**

We may use your data for marketing purposes – both our own and those of other companies in the VTS Group and cooperating entities. Detailed rules for processing in this regard can be found in the Appendix in Part A.

- **Social media activity:**

We maintain our accounts on social media platforms in accordance with the rules of the operators of these platforms. Through these accounts, we inform you about our activities, events, products and services, and build and maintain relationships with our community. We use data from social media for communication (e.g. comments, messages) and to create activity statistics, which is our legitimate interest.

Detailed information on the purposes, scope of processing, legal basis and retention periods for your personal data is described in the Appendix to the Privacy Policy. We will also provide additional information on the processing of your data at the time of collection.

4. WHAT DATA DO WE COLLECT AND PROCESS?

We collect your personal data only to the extent necessary, depending on the type of services we provide, the products we sell and the information you voluntarily provide to us. The type of data collected may vary depending on the context. The detailed scope, purposes, legal bases and retention periods for each category of data are set out in the Appendix to the Privacy Policy.

4.1. THE MAIN CATEGORIES OF DATA THAT WE MAY COLLECT AND PROCESS:

- **Contact and identification data:**

Name and surname, e-mail address, telephone number, postal address. In the case of business services – additionally, company name, tax identification number, statistical number and other identification data related to business activity.

- **Authentication data:**

Passwords, verification codes and other information securing access to your account.

- **Financial data:**

Bank account numbers, credit or debit card details necessary to process payments for our services or products in Online Shops.

- **Data collected through registration, forms and surveys:**

Information you provide when registering with our systems, participating in programmes, competitions or events. This may include identification data, contact details and information about your preferences and interests.

- **Data provided when submitting enquiries:**

The content of messages sent via contact forms, chat, e-mail or other communication channels.

- **Data collected automatically:**

When you use our Websites, Applications (mHMI, ClimaCAD OnLine 4), website or mobile application related to Recuperators and Online Shops, we automatically collect technical data that helps us ensure the proper functioning of our solutions, including:

- IP address,
- System log information and activity history,

VTS GROUP PRIVACY POLICY

- Device and connection data, such as browser type and version, time zone settings, geographical location (e.g. region, country code),
 - Information collected using cookies and other similar technologies.
- **Data related to the performance of contracts:**
In order to conclude and perform contracts for the provision of services or sale of products, we process data necessary for:
 - User account management (e.g. registration date, location data),
 - Executing transactions, delivering shipments and providing services (e.g. identification data, payment information).
- **Data related to usage:**
Behavioural information, such as how you navigate our Websites, Applications, website or mobile application related to Recuperators or Online Shops, most frequently used features and purchasing preferences (e.g. wish list, interests).
- **Technical data:**
Device and connection information, such as IP address, browser type and version, geographical location (e.g. region, country code, time zone settings), advertising identifiers, cookie or tracker data.
- **Audio and video data:**
Audio recordings, photos or images, if you share them when participating in our events or contacting us (e.g. via chat or video conference).
- **Other data:**
Any additional information you provide to us through our Websites, Applications, website or mobile application related to Recuperators, Online Shops or other products and services (e.g. content of messages in contact forms, comments in chat).
- **Data processed in Online Shops:**
As part of the Online Shops, we process the personal data of Buyers that is necessary to conclude and perform the Sales Agreement, including:
 - First and last name,
 - E-mail address,
 - Contact telephone number,
 - Delivery address (street, house number, flat number, postcode, town, country),
 - Address of residence or business/registered office (if different from the delivery address).
 - For Buyers who are not consumers, we also process the company name and tax identification number (VAT number). The scope of required data is always indicated on the website of the Online Shop and in the Shop Regulations.
- **Data processed in the mHMI Application:**
When you use the mHMI Application, which is linked to your account, we collect the following data:
 - **Account information:**
Account name, e-mail address, country, company name, address, NIP number, telephone number – data necessary to conclude a user agreement.
 - **Location information:**
Device location data, such as region, country code, city code, time zone and language settings.
 - **Log information:**
IP address, system logs, activity history, and crash information – data necessary for monitoring application performance and troubleshooting.
 - **Authentication data:**
Password and verification code, necessary to secure your account and access to the service.
 - **Automation and scene settings information:**
Automation and scene name, conditions and list of actions, effective time period setting, execution result notification setting, and settings to enable or disable automation.
 - **Feedback:**
The content of your feedback, contact details, and error logs that you provide to us when you give us your opinion or report problems.
 - **Device information:**
Data obtained from your device, necessary to display device information in the application.

4.2. SOURCE OF DATA

Data may be collected directly from you when you register with our systems, use our services or fill out forms. It may also be supplemented with data from other sources, such as public records or data obtained from third parties that provide analytical services.

4.3. AGE RESTRICTIONS

- Our services are intended only for adults who are 18 years of age or older. We do not permit persons under the age of 18 to use our services.
- VTS does not collect personal data from minors or send promotional materials to persons in this category.
- If we learn that a minor's data has been provided, we will take immediate action to delete it.
- If a parent or guardian has reason to believe that a minor's personal data has been submitted without their consent, please contact us to ensure that this data is deleted immediately.

5. HOW LONG DO WE STORE YOUR DATA?

We do not store your data for longer than is necessary to fulfil the purposes for which it was collected, taking into account its scope, nature and possible risk of harm.

5.1. PROCESSING PERIOD

The storage period for your data depends on the purpose for which it was collected and the legal basis for its processing. We take into account:

- If the data is processed on the basis of consent (e.g. for marketing purposes), it will be stored until consent is withdrawn.
- In the case of data processing for the purpose of performing a contract, the data is stored for the duration of the contract and for the limitation period of claims arising from it.
- If the data is processed on the basis of legal obligations, we will store it for as long as required by law.
- When processing data on the basis of a legitimate interest, the data will be stored for the duration of that interest.

5.2. DATA STORAGE IN APPLICATIONS AND ONLINE SHOPS

- When using the mHMI application, ClimaCAD OnLine 4 and Online Shops, data such as account information, logs, authentication data, automation settings and technical data will be stored until the user deletes their account. In the case of processing temporary logs created during remote diagnostics related to reported failures, the data will be deleted within 30 days at the latest.
- After closing your account, your data will be irrevocably deleted or anonymised, usually within 6 months at the latest. During this period, the data may still be processed solely for the purpose of fulfilling legal obligations or protecting our legitimate interests (e.g. pursuing claims).

5.3. DATA DELETION

- We will delete your data when it is no longer necessary for the purposes for which it was collected.
- Some categories of data may be deleted earlier if they are no longer needed for a specific purpose, but others, such as those related to legal obligations, may be stored for a longer period.

5.4. ADDITIONAL RULES FOR MARKETING FUNCTIONS

- If your data is processed for marketing or advertising purposes, it will be stored until you withdraw your consent or unsubscribe from advertisements (including commercial communications), in accordance with the settings available in your account in the Applications or Online Shops.

6. WHO DO WE SHARE YOUR DATA WITH?

We only share your personal data with other entities when it is necessary to provide our services, perform contracts, comply with legal obligations, or when we have a legitimate interest. We use appropriate safeguards to protect your data when it is transferred.

6.1. INTERNAL DISCLOSURE OF DATA

VTS GROUP PRIVACY POLICY

Your data may be shared internally within our organisation to support the provision of services and improve the quality of our solutions.

6.2. VTS GROUP

Your data may be transferred to other companies within the VTS Group, including franchisees of VTS Group companies that support us in the development of services, business analysis, security and customer service. The transfer of data between entities within the VTS Group enables us to provide the comprehensive services you use. We never transfer more data than is necessary to achieve a specific, above-mentioned purpose, and each data recipient undertakes to comply with the principles of this Policy and the GDPR.

6.3. THIRD-PARTY SERVICE PROVIDERS

In order to provide our services, we use external entities that process your data in accordance with our instructions. These may include:

- IT service providers, including hosting and IT infrastructure maintenance systems,
- Entities providing accounting and legal services, debt collection and factoring services,
- Entities specialising in maintenance and customer service, including shipping companies and contact centres.

6.4. MARKETING AND ANALYTICS SERVICE PROVIDERS

In order to improve our services and support our marketing activities, we share selected data with analytics and marketing service providers, such as Google Analytics and social media monitoring tools. More detailed information on the marketing and analytics tools we use can be found in the Appendix in Part A.

The legal basis for data processing by these tools depends on their configuration:

1. **Consent (Article 6(1)(a) of the GDPR)** – if the tool stores cookies on your device or uses similar tracking technologies that enable identification or profiling. Consent is obtained by our cookie banner; you can withdraw it at any time in your Privacy Settings.
2. **Legitimate interest (Article 6(1)(f) of the GDPR)** – we only use this when:
 - the data is **immediately pseudonymised/anonymised** (e.g. shortened IP address, no transfer of unique user IDs);
 - we use it exclusively in the form of **statistical reports** to evaluate website performance, errors or aggregated trends.

Data may be transferred to providers based outside the EEA (e.g. Google). In such cases, we apply the measures required by the GDPR (adequacy decisions, standard contractual clauses, additional technical safeguards) – details in section 7.

This allows us to analyse how our Websites, Applications, webpages and mobile applications relating to Recuperators and Online Shops are used and to optimise our products and services.

6.5. PAYMENT SERVICE PROVIDERS

In order to execute payment transactions, your data is transferred to payment service providers or other entities handling electronic and card payments. This entity becomes a separate controller of your data and processes it only to the extent necessary to execute the payment and to verify and identify the customer.

6.6. LAW ENFORCEMENT AGENCIES, SUPERVISORY AUTHORITIES AND OTHERS

In cases provided for by law or in situations where the competent authorities request the disclosure of data, we may disclose selected information about you. We will do so in accordance with applicable law and only to the extent necessary to comply with such a request.

6.7. DATA TRANSFER WITHIN ONLINE SHOPS

When using Online Shops:

VTS GROUP PRIVACY POLICY

- If you choose courier delivery, your personal data (such as delivery address and contact details) may be transferred to the selected carrier or intermediary handling deliveries on behalf of the Controller.
- If you use electronic or card payment methods, your data necessary for the payment to be made is transferred to the selected entity handling these payments.

6.8. OTHER DATA RECIPIENTS

Your data may also be transferred to the following entities:

- **Business partners:** Entities with whom we cooperate, such as banks or other companies that enable faster and more efficient payments and the execution of sales contracts. Such entities control and manage personal data in accordance with the contract.
- **Industry, accreditation and professional organisations:** Data may be transferred to organisations that support access to our services or monitor activities within industry programmes.
- **Entities involved in corporate transactions:** In the event of a merger, acquisition, sale or restructuring of the company, your data may be transferred to entities involved in such transactions.
- **Other recipients with your consent:** In addition to the disclosures described above, your data may be shared with third parties when you voluntarily consent or instruct us to do so.

In all cases, we ensure that the data provided is used only for the purposes for which it was made available, and that access to it is restricted to those entities necessary to perform specific tasks.

7. DO WE TRANSFER YOUR DATA OUTSIDE THE EEA?

We transfer your personal data outside the European Economic Area (EEA) only when necessary to provide our services or when required by law, and always with an adequate level of protection in accordance with GDPR requirements.

7.1. BASIS FOR TRANSFERRING DATA OUTSIDE THE EEA:

Your personal data may be transferred to [countries outside the EEA](#) that the European Commission has recognised as providing an adequate level of data protection. Where countries to which personal data is transferred do not offer such a level of protection, we apply additional safeguards, such as Standard Contractual Clauses approved by the European Commission. In such cases, data is transferred only to the extent necessary to achieve specific purposes.

7.2. DATA SECURITY PRINCIPLES:

When transferring data outside the EEA, we take special precautions, including:

- We minimise the scope of data transferred outside the EEA.
- We verify that service providers based outside the EEA guarantee a high level of personal data protection in accordance with EU regulations.
- We use model contractual clauses and other safeguards to ensure that your data is protected to the same level as in the European Union.

7.3. ACCESS TO DATA BY EXTERNAL ENTITIES:

In situations where data transfer outside the EEA is necessary (e.g. for the provision of payment, hosting or analytical services), your personal data is only transferred to entities that process it in accordance with our instructions and on the basis of contracts concluded in accordance with the requirements of the GDPR.

We transfer your personal data outside the EEA when using the following tools on our websites:

- Google Tag Manager, Google Analytics, Google Merchant, Google Ads – the provider of these tools (Google Ireland Limited, based in Ireland) transfers personal data to other entities based outside the EEA:
 - Google UK Ltd based in the United Kingdom, Google Israel Ltd. based in Israel, TMJ, Inc. based in Japan, SCSK Serviceware Corporation based in Japan, K.K. Teledirect Japan based in Japan, Jellyfish U.K. Limited based in the United Kingdom, Accenture

VTS GROUP PRIVACY POLICY

- Japan Ltd. based in Japan – personal data is transferred to entities based on adequacy decisions;
- Google Peru S.R.L. in Peru, Google Kenya Limited in Kenya, Google FZ LLC in the United Arab Emirates, Google Colombia Limitada in Colombia, Google Brasil Internet Ltda. in Brazil, Google Australia Pty Ltd. in Australia, Google Asia Pacific Pte. Ltd. in Singapore, Google Argentina S.R.L. in Argentina, Google Infraestructura Argentina S.R.L. in Argentina, GOC Services India Private Limited in India, GOC Philippines, Inc. in the Philippines, TTEC Brasil Serviços Ltda. in Brazil, TDCX (MY) Sdn. Bhd. in Malaysia, Regalix India Private Limited in India, Regalix Inc. in the USA, Intelenet Global Services Private Limited in India, HCL Technologies Limited in India, HCL (Brazil) Tecnologia da Informação Ltda in Brazil, HCL America Inc. in the USA, GlobalLogic Technologies Limited in India, GlobalLogic Inc. in the USA, EPAM Systems Inc. in the USA, Concentrix Daksh Services India Private Limited in India, Concentrix Solutions Corporation in the USA, Competence Call Centre İstanbul Çağrı Merkezi Hizmetleri Anonim Şirketi in Turkey, Cognizant Technology Solutions Philippines, Inc. in the Philippines, Cognizant Technology Solutions India Private Limited in India, Cognizant Technology Solutions de Mexico S.A. de C.V. in Mexico, Cognizant Technology Solutions de Argentina SRL in Argentina, Cognizant Serviços de Tecnologia e Software do Brasil S/A in Brazil, Atento Argentina S.A. in Argentina, Accenture Solutions Private Limited in India, Accenture LLP in the USA, Accenture Inc. in the Philippines, Accenture Co. Ltd. in Taiwan – personal data is transferred to entities based in the USA on the basis of standard contractual clauses issued by the European Commission.
 - Meta Pixel – the provider of this tool (Meta Platforms Limited based in Ireland) transfers personal data to other entities based outside the EEA:
 - Meta Platforms Inc., based in the USA – personal data is transferred to an entity based in the USA listed under the Data Privacy Framework programme based on the European Commission's adequacy decision;
 - Andale Inc., Greater Kudu LLC, Goldframe LLC, Meta Operations LLC, Morning Hornet LLC, Offprints LLC, Omanyte LLC, Paile LLC, Raven Northbrook Services Limited, Scout Development LLC, Siculus Inc., Sidecat LLC, Stadion LLC, Starbelt LLC, Woolhawk LLC, Vitesse LLC, Winner LLC d/b/a Ernst LLC based in the USA – personal data is transferred to entities based in the USA in accordance with standard contractual clauses issued by the European Commission.
 - LinkedIn Insight Tag – the provider of this tool (LinkedIn Ireland Unlimited Company based in Ireland) transfers personal data to other entities based outside the EEA. Personal data is transferred based on adequacy decisions of the European Commission and standard contractual clauses issued by the European Commission.

8. HOW DO WE ENSURE DATA SECURITY?

8.1. TECHNICAL AND ORGANISATIONAL SAFEGUARDS:

All information we receive about you is stored on appropriately secured servers. We continuously assess the security level of our network and monitor internal procedures to:

- protect your data from accidental or unauthorised loss, access or disclosure,
- identify potential risks to the security of our systems,
- minimise threats through regular testing and risk assessment.

8.2. ENCRYPTION AND PAYMENT PROTECTION:

All payment-related data is encrypted using SSL technology, which guarantees its confidentiality during transmission.

8.3. THIRD-PARTY SERVICE PROVIDERS:

VTS GROUP PRIVACY POLICY

In order to maintain and provide our services, we use external providers who process personal data on our behalf. We only work with entities that:

- guarantee a high level of data protection in accordance with the provisions of the GDPR,
- process data only to the extent necessary to perform specific tasks,
- operate on the basis of data processing agreements that clearly define the obligations of both parties and the security measures applied.

8.4. LINKS TO THIRD-PARTY WEBSITES:

Our Websites, Web Applications and Mobile Applications may contain links to third-party websites or applications. We have no control over the privacy policies of these websites or applications; their providers are solely responsible for their own regulations. We encourage you to review the privacy policies of each website you visit.

9. COMMUNICATION AND MARKETING

9.1. SERVICE-RELATED COMMUNICATION

As part of providing our services, we may contact you by email and text messages. The purpose of these communications is to:

- inform you about the status of services,
- provide information related to the performance of contracts, including important communications regarding the functioning of our Websites, Applications, website or mobile application related to Recuperators and Online Shops.

Sending these messages is necessary for the proper functioning of our services (e.g. information about changes to the terms and conditions, important system updates, technical problems, etc.), so you cannot opt out of receiving them.

9.2. SURVEYS INCLUDING SATISFACTION SURVEYS

From time to time, we may contact you to find out how you rate our services and products. Such activities are undertaken sporadically and are aimed at continuously improving our offer. You have the right to object to participating in satisfaction surveys in accordance with the information contained in Chapter 11.

9.3. COMMUNICATION IN RESPONSE TO YOUR ENQUIRIES

If you use the contact form or another communication channel (chat, e-mail, telephone), we will use the data you provide to answer your questions, consider your complaint or present an offer, depending on the purpose of your message.

9.4. MARKETING COMMUNICATION

We will use your e-mail address and telephone number, as well as the mHMI Application on the device you use, to send you direct marketing communications (e.g. e-mails, push notifications, text messages or phone calls) to inform you about our products, promotions and news.

- Marketing communications are sent only on the basis of your consent, which you can give during registration or through the settings in our Websites or Applications.
- You may withdraw your consent to marketing communications at any time by using the unsubscribe link included in each email or through the consent management panel available in the Applications. If you have any problems withdrawing your consent, please contact us via the [Contact Form](#).

10. PROFILING

We use profiling to achieve our marketing and analytical goals and to optimise the functioning of our services, including account management in Online Shops, Web Applications, Mobile Applications, the website or mobile application related to Recuperators, and other Websites. This means that through the automatic processing of your personal data, we analyse selected information about your activities, preferences and behaviour. This allows us to:

VTS GROUP PRIVACY POLICY

- Better tailor content and offers to your individual needs,
- Forecast future activities and adapt our services,
- Improve our solutions by enhancing the quality of our services.

The results of profiling do not have any legal effect on you and do not significantly affect your situation. You have the right to object to profiling, especially for marketing purposes, in accordance with the information contained in Chapter 11.

11. YOUR RIGHTS

The GDPR guarantees you specific rights in relation to the processing of your personal data. Below we present what rights you have and how you can exercise them:

11.1. YOUR RIGHTS

11.1.1. RIGHT OF ACCESS TO DATA

You have the right to check whether we process your personal data and, if so, to receive a copy of it and information about the purposes of processing, categories of data, recipients or categories of recipients, and storage periods.

11.1.2. RIGHT TO RECTIFICATION

You have the right to request that incorrect, incomplete or outdated data be corrected. In some cases, we may require verification of the new data you provide to us.

11.1.3. RIGHT TO RESTRICT PROCESSING

You may ask us to restrict the processing of your data, for example, when:

- you contest its accuracy,
- the processing is unlawful,
- we no longer need your data, but you need it to assert your claims or defend against claims,
- you object to further processing (in such situations, we will check whether we have overriding grounds to continue).

11.1.4. RIGHT TO OBJECT

You have the right to object to the processing of your data, especially when the processing is based on our or third parties' legitimate interests, including for marketing purposes. You may object at any time, which may result in the cessation of further processing of your data for marketing purposes.

11.1.5. RIGHT TO ERASURE ('RIGHT TO BE FORGOTTEN')

You have the right to request the erasure of your personal data if:

- it is no longer necessary for the purposes for which it was collected,
- you withdraw your consent (if this is the only basis for processing),
- you effectively object to their processing,
- it must be erased under the law.

Please note that in some cases we have to continue processing the data in order to comply with legal obligations.

11.1.6. RIGHT TO DATA PORTABILITY

You have the right to receive your personal data that you have provided to us in a structured, commonly used, machine-readable format and to transfer it to another controller if the processing is based on consent or in the performance of a contract and the data is processed by automated means.

11.1.7. RIGHT TO WITHDRAW CONSENT

VTS GROUP PRIVACY POLICY

If the processing of your data is based on your consent, you have the right to withdraw that consent at any time. Withdrawal of consent does not affect the lawfulness of data processing that took place before withdrawal.

11.2. HOW TO EXERCISE YOUR RIGHTS

To exercise your rights, you can contact us in one of the following ways:

- **Email:** IOD@vtsgroup.com
- **Telephone:** +48 510 130 633
- **Post:** rue de L'Industrie 20, L-8399 Windhof, Luxembourg
- **Contact form:** available on our website

In addition, you can exercise your right to object to the processing of marketing data by clicking on the unsubscribe link in the emails sent to you or by changing the notification settings in your account in the Applications or Online Shops.

11.3. FULFILLING YOUR REQUESTS

The fulfilment of your rights is usually free of charge. We endeavour to respond to requests within one month of receipt. If your request is particularly complex or repetitive, the processing time may be extended, in which case we will inform you in advance.

11.4. COMPLAINT TO THE SUPERVISORY AUTHORITY

If you believe that we are violating the regulations regarding the protection of your personal data, you have the right to lodge a complaint with the competent supervisory authority. In matters related to data processing, you can contact the President of the Personal Data Protection Office at ul. Stawki 2, 00-193 Warsaw.

12. CONTACT

For further information on the protection of your data or to exercise your rights, please contact us:

- **Contact form:** available on our website.
- **Email:** IOD@vtsgroup.com
- **Telephone:** +48 510 130 633
- **Postal address:**
rue de L'Industrie 20,
L-8399 Windhof,
Luxembourg

If you have any questions about the processing of your personal data or would like to exercise your rights, please contact us.

13. CHANGES TO THE PRIVACY POLICY

- 13.1. We may amend or update this Privacy Policy to reflect changes in the law or our practices. Any changes will be posted on our website, on the Websites, in the Web Applications, on the webpage or in the mobile application for Recuperators, Online Shops and Mobile Applications. If you have provided us with your e-mail address, we will also notify you of significant changes by e-mail. Such changes to our Privacy Policy will take effect on the date specified in the announcement or on the Website.
- 13.2. If you do not agree to the changes in the Privacy Policy, you have the right to close your account in the Internet Applications, Online Shops or Mobile Applications. You will find the option to close your account in your account settings.
- 13.3. In matters not covered by this Policy, we apply the provisions of the GDPR and other applicable laws.

APPENDIX TO THE PRIVACY POLICY

The scope, purposes, legal basis and retention periods of your personal data may vary depending on the type of services you use, the consents you have given and the way you contact us. To help you understand how we use your data, we have prepared the following appendix, which divides the information into sections corresponding to the different relationships between you and us.

In each section, you will find detailed information about:

- the categories of personal data we process,
- the purposes for which we process this data,
- the legal bases on which we rely for processing,
- data retention periods.

When you use specific services or participate in promotional campaigns, detailed information about the processing of your data may also be included in the terms and conditions of those services and campaigns.

In this appendix, we describe what categories of data we collect, for what purposes they are used, and on what legal basis. We also specify the maximum data retention periods for each purpose.

In some cases, when data is processed as part of the services provided, we can distinguish between:

- **Part A – Provision of Services:** This concerns data processed directly in connection with the provision of services (e.g. account registration, transaction processing, order handling).
- **Part B – Other Purposes:** This includes the processing of data that is not directly related to the provision of services, but results from legal obligations or our legitimate interests (e.g. marketing purposes, analysis, profiling).

DATA RETENTION PERIOD

For each processing purpose in this appendix, we specify the legal basis and the maximum data retention period. After the specified period has expired, your data will no longer be used for the specified purpose, but this does not always mean that it will be deleted immediately. We store data for the longest period required by applicable law – for example, even after you close your account, data may be stored to enable you to exercise your rights or to comply with legal obligations.

For a complete overview of how your data is processed, we encourage you to read all sections of the appendix that relate to specific services or promotional activities.

PART A

WEBSITES

HERE THE CONTROLLER IS: A) VTS SP. Z O.O., B) VTS POLSKA SP. Z O.O. OR C) VTS PLANT SP. Z O.O., DEPENDING ON THE SELECTED WEBSITE

1. WHEN YOU BROWSE CONTENT ON OUR WEBSITES, INCLUDING AS A GUEST

We may collect information about your activity using cookies and other web technologies, such as web beacons or "tracking pixels". These tools are small text files that are stored on your end device, such as a smartphone or laptop, when you use one of the Websites. Cookies are used to:

- display content on the Websites correctly,
- analyse and improve the quality of our services,
- reach you with tailored information (remarketing),
- measure and monitor interactions with advertisements placed on the Websites.

2. PLACING ORDERS

Some of the Websites offer the possibility to place orders for products presented on the Websites. Orders can be placed using a dedicated contact form, which should include the necessary information to process the order. Orders can also be placed using the contact details provided on the Website.

When placing orders in the manner described above, we collect the information contained in the message sent in order to conclude a sales contract and fulfil the order placed.

3. SCOPE OF DATA COLLECTED

In the process related to your activity on the Websites, we do not collect information that directly identifies you, such as your name and e-mail address (unless you provide it to us yourself as part of other functionalities on the Website). However, we may use:

- **Device data** – including device type and model, operating system version, language settings, brand, browser version and type, time zone, IP address;
- **Website activity data** – including information about the pages from which you came to us, the time and order of visits to individual sections of the Website, clicks on banners, interactions with advertisements, and search results.

4. TYPES OF COOKIES

The Websites may use cookies of the following categories: essential, functional, analytical and marketing:

- a. essential cookies – technical files that are necessary for the Websites to function properly;
- b. functional cookies – files used to remember settings that tailor the Websites to your preferences, including the selected language of the Website and personalisation of functionality. Your consent is required to use these files;
- c. analytical cookies – files used to measure the effectiveness of our marketing activities and improve the functioning of the Websites (including, for example, analysing traffic on the Websites and its sources). The collection of the above information through analytical cookies is intended to display and tailor advertisements, personalise them, measure their effectiveness and conduct marketing campaigns, including on external websites or social networks;
- d. marketing cookies – files used to profile advertisements displayed on external websites according to your preferences, we will then be able to use information about your behaviour on our website to tailor advertisements.

Detailed information about cookies used within a given category (including information about the name and purpose of a given cookie and its expiry date) can be found in the cookie banner that appears during your first visit to each of the Websites. You can display the cookie banner by clicking on the dedicated icon in the lower left corner of the Website. Clicking on this button will display the cookie banner, where you can expand the descriptions of individual categories of cookies and express or withdraw your consent to the installation of individual cookies.

In principle, the controller uses cookies placed on the Websites to ensure the proper functioning of the website and the provision of services. We also use functional, analytical and marketing cookies.

Cookies other than the essential ones, to the installation of which you consent, may be used by our partners or service providers (so-called third-party cookies), who use functional, analytical and marketing cookies.

5. MARKETING AND ANALYTICAL TOOLS USED

Controllers use various solutions and tools for marketing and analytical purposes. Below are explanations and information about the solutions used:

- Google Tag Manager – enables easy management of tags and scripts on the website without interfering with the code. Controllers use it to efficiently implement analytical and marketing tools;

VTS GROUP PRIVACY POLICY

- Google Analytics – used to monitor traffic, user behaviour and website performance. Controllers use it to make data-driven decisions and optimise the user experience.
- Google Merchant – this tool allows you to upload your product catalogue to Google so that it is visible in shopping results. Controllers use it to integrate shops with product campaigns and increase sales.
- Google Ads – a platform for creating advertising campaigns on Google's search engine and advertising network. Controllers use it to attract traffic and customers through paid advertising.
- Meta Pixel – a tool that allows you to monitor user activity on the website after viewing ads on Facebook and Instagram. Controllers use it for optimising campaigns and remarketing.
- LinkedIn Insight Tag – a monitoring tool that collects data about users visiting the site from LinkedIn. Controllers use it for analytics, conversion measurement and ad targeting.

6. COOKIE BANNER AND CONSENT MANAGEMENT

When you visit one of the Websites, we will ask you what cookies, apart from the necessary ones, we can place on your device – you can give your consent to the installation of cookies via the cookie banner used to manage your consents. If only cookies necessary for the proper functioning of the Website are used on a given Website, you will only be informed of this fact without the need to give separate consent.

Depending on the settings of your device and web browser, you can restrict or disable the storage of cookies at any time. However, this may affect some of the Website's functionality.

The use of functional, analytical and marketing cookies requires separate consent. Your consent is not required only in the case of cookies necessary to provide access to the Website. Without the use of essential cookies, it is not possible for the Controller to provide access to the Website.

You can give separate consent to the use of functional, analytical and marketing cookies via the cookie banner used to manage consent to the installation of cookies.

You can manage your consents, including withdrawing them at any time, by calling up the cookie banner by clicking on the dedicated icon available in the lower left corner of the Website. To withdraw your consent, call up the cookie banner by clicking on the dedicated icon in the bottom left corner of the Website, and then select the "refuse" button or uncheck the consents given for the installation of individual cookies in the cookie banner.

You can also delete cookies from your browser settings at any time. Information on how to do this from different browsers can be found below:

- [Google Chrome](#)
- [Mozilla Firefox](#)
- [Safari](#)
- [Microsoft Edge](#).

7. LOCATION DATA

If you choose to share your approximate location with us (e.g. in your browser or device settings), we may use it to measure the effectiveness of the advertisements displayed and tailor them to your needs (e.g. by showing you content about products or services available in your region).

8. DATA RETENTION PERIOD

We distinguish between cookies in terms of data retention period according to the time they are stored on your device:

- Session cookies – remain on your device until you leave the Website or close your web browser;
- Persistent cookies – these are stored on your device for the period specified in the parameters of a given cookie or until they are manually deleted.

VTS GROUP PRIVACY POLICY

Information about the type of cookie in terms of its retention period (session or persistent) is always included in the cookie banners available on the Websites.

9. PURPOSES AND GROUNDS FOR PROCESSING COOKIE DATA

We use the information collected using cookies and similar technologies for various purposes. Below are the main categories of these purposes, legal bases and retention periods:

PURPOSES OF PROCESSING	LEGAL BASIS FOR PROCESSING	DATA RETENTION PERIOD
Provision of electronic services (in terms of making content collected on the Websites available to users)	Necessity of processing for the performance of a contract (Article 6(1)(b) of the GDPR)	The data is stored for the period necessary to provide the services.
Enabling orders to be placed via the contact form and using the contact details provided on the Website	Necessity of processing for the conclusion and performance of a contract (Article 6(1)(b) of the GDPR). Legal obligation (Article 6(1)(c) of the GDPR). Legitimate interest of the Controller (Article 6(1)(f) of the GDPR), consisting in the need to forward the order to a company from the VTS Group handling a specific order	We store data for as long as necessary to conclude and perform the sales contract (until the order is shipped and settled). After this period – for the time necessary to fulfil legal obligations (e.g. tax obligations). Within the scope of legitimate interest, personal data will be processed for the time necessary to achieve the purpose, no longer than until the expiry of the limitation period for claims or until an effective objection is lodged.
Tailoring of own and partner advertisements on the Websites, remarketing	User consent (Article 6(1)(a) of the GDPR) to the use of cookies and other technologies	We store data until the expiry of the individual cookies described in the cookie banner or until you delete them from your device yourself.
Analysis of user activity on the Websites for purposes other than advertising	User consent (Article 6(1)(a) of the GDPR) to the use of cookies and other technologies	
Establishing, pursuing or defending against claims	The legitimate interest of the Controller (Article 6(1)(f) of the GDPR), consisting in pursuing or defending against claims	For the time necessary to achieve the purpose, no longer than until the expiry of the limitation period for claims or until the expiry of the time limit for lodging an effective objection

mHMI APPLICATION

THE CONTROLLER OF THIS PROCESS IS VTS SP. Z O.O.

The mHMI application enables remote control and monitoring of VTS smart devices (e.g. ventilation and air conditioning units) connected to the VTS Cloud. When using mHMI, we may process your personal data to the extent necessary for the proper functioning of the Application, to provide access to remote control functions, to provide technical support, and, with your consent, for marketing purposes.

The mHMI Pro application can be used after purchasing an activation code in the Online Shop. In order to give you access to the Pro version of this application, we need to pair your purchase in the Online Shop with the mHMI application. This is possible thanks to the mutual transfer of your personal data related to the purchase between this application and the Online Shop. This means that information about your purchase will be shared between VTS sp. z o.o. and VTS Plant sp. z o.o.

1. SCOPE OF DATA COLLECTED IN THE APPLICATION

Depending on which functions of the mHMI Application you use and what information you provide to us, we collect, among other things:

- **Account information** – such as your email address, first name, last name, telephone number, company name, address, country, tax identification number, which enable you to register and authenticate in the Application and create an individual profile.
- **Login details** – e.g. the password that protects access to your account.

- **Log data** – including activity in the Application, e.g. changes made to device settings, failure logging, activity history.
- **Device information** – including technical and operational parameters of controlled devices (e.g. operating mode, schedules, automation and configuration parameters), location, energy consumption data, alarms and device activity history.
- **Marketing information** – including data about your end device (e.g. phone model, operating system version, system language) to the extent necessary to display personalised marketing messages, provided you have given your separate consent.
- **Third-party data (SDK)** – the Application uses third-party tools (Software Development Kits), e.g. for translation or performance analysis. They may collect technical data (e.g. device brand, operating system type), location settings (country/region) or network connection status (Wi-Fi/mobile), which is used to ensure the proper functioning of selected Application features.

2. VOLUNTARY PROVISION OF DATA

Providing data in the mHMI Application is generally voluntary, but some information (e.g. email address, password) is necessary to create and maintain an account in the Application. Failure to provide this information will prevent you from using the mHMI Application. If you do not consent to certain forms of data processing (e.g. marketing functions), this may limit the availability of some additional features, but will not affect the basic functioning of the mHMI Application.

3. DATA RETENTION PERIOD

- We store your account data (e.g. email address, first name, surname) for as long as your account in the mHMI Application exists. Once your account is deleted, the data is permanently deleted or anonymised.
- Device information and activity logs are stored in the mHMI Application until the account is deleted or the device is reset.
- Marketing data, collected on the basis of your consent, is stored until you withdraw your consent or until you deactivate the marketing functions in the mHMI Application settings.

PURPOSES OF PROCESSING	LEGAL BASIS FOR PROCESSING	DATA RETENTION PERIOD
Provision of services related to the creation and maintenance of an account in the mHMI Application (remote control of devices, registration and maintenance of an account, proper functioning of mHMI, contact with users regarding the operation of the mHMI Application)	Necessity of processing for the performance of a contract (Article 6(1)(b) of the GDPR), in the scope of data provided optionally (not mandatory), the legal basis for processing is consent (Article 6(1)(a) of the GDPR)	The data is stored for the period necessary to provide the services. It is deleted at the latest when the account in the mHMI Application is deleted or the device is reset. In the case of optional data, it is stored until consent is withdrawn.
After-sales service and technical support (contact in case of errors, complaints, faults)	Necessary for the performance of a contract (Article 6(1)(b) of the GDPR); legitimate interest of the Controller (Article 6(1)(f) of the GDPR) consisting in conducting failure analyses	The data is stored for the period necessary to provide support. Upon termination of use of the Application, the data is permanently deleted or anonymised, unless there is another legal basis for further storage (e.g. legal provisions). With regard to personal data processed on the basis of a legitimate interest, the data is stored for the time necessary to achieve the purpose, but no longer than until the expiry of the limitation period for claims or until an effective objection is lodged.
Analysis and improvement of the mHMI Application (including collecting information about errors, performance, use of external tools – SDK)	The legitimate interest of the Controller (Article 6(1)(f) of the GDPR) consisting in ensuring the continuity and development of services	The data is stored for the time necessary for analysis and improvement or until an effective objection is lodged. After the analysis is completed, the data is anonymised or deleted if there is no other basis for

		processing (e.g. billing purposes or legal provisions).
Analysis of user activity in the mHMI Application	The legitimate interest of the Controller (Article 6(1)(f) of the GDPR), consisting in analysing user activity and preferences in order to improve the functionalities used and the services provided	Until your account is closed, but no longer than until you effectively object
Establishing, pursuing or defending against claims	The legitimate interest of the Controller (Article 6(1)(f) of the GDPR), consisting in pursuing or defending against claims	For the time necessary to achieve the purpose, no longer than until the claims become time-barred or until an effective objection is lodged

ONLINE SHOPS

THE CONTROLLER OF THIS PROCESS IS: A) VTS sp. z o.o. OR B) VTS PLANT SP. Z O.O., DEPENDING ON THE ONLINE SHOP SELECTED

The following rules apply to purchases made through Online Shops available at the following addresses: a) <https://eshop.vtsgroup.com/> and b) <https://eshopahu.vtsgroup.com/>. Online Shops may offer both a standard purchasing process and additional functionalities that facilitate payments and speed up transactions.

1. REGISTRATION AND ACCOUNT MANAGEMENT IN ONLINE SHOPS

1.1. DATA NECESSARY FOR REGISTRATION AND ACCOUNT MANAGEMENT

- In order to use certain features of Online Shops (e.g. remembering your purchase history, tracking shipments or easier reordering), it may be necessary to create an account.
- For this purpose, we may ask you to provide basic identification data (e.g. name and surname, e-mail address, telephone number), and in the case of company purchases – also the company name and tax identification number.
- Providing this data is voluntary, but necessary for the proper use of the account (conclusion and performance of a contract for the provision of electronic services).

1.2. DATA RELATED TO ORDERS AND THE PERFORMANCE OF THE SALES AGREEMENT

- When placing an order, we will ask you for the data necessary to process it, including the delivery address (street, house number, postcode, town), contact telephone number, e-mail address (for sending notifications).
- This data is necessary for the conclusion and performance of the Sales Agreement, enabling, among other things, the issuance of an invoice (if required), payment processing and delivery of goods.

1.3. ADDITIONAL SERVICES IN ONLINE SHOPS

- If our Online Shops offer a loyalty programme or other additional features (e.g. discounts, points), we may additionally process your data related to your activity within these services (e.g. history of points collected, promotional codes used, rewards awarded).
- In the case of special promotions or lotteries organised by external entities, we may, at your request, provide selected information necessary to confirm your eligibility for a reward (e.g. account status, status of a participant in a given promotion).

2. PAYMENTS IN ONLINE SHOPS

2.1. PAYMENT FOR ORDERS

- When making purchases, you can choose one of the payment methods we offer (e.g. online transfer, payment card, integrated payment system).

- Depending on the payment method you choose, we may ask you to provide additional information necessary to process the transaction (e.g. credit/debit card details).
- We pass this information on to the payment service provider (e.g. a bank or financial institution operating the electronic payment system). This entity processes the data as a separate controller to the extent necessary to execute the transaction and verify the payment.

2.2. OPTION TO SAVE CARD DETAILS

- If our Online Shops offer a "remember my card" option (to facilitate future payments), you may voluntarily consent to saving your card details in your account.
- In this case, we only store the basic information needed to reuse the card, such as the cardholder's name, card type, the last four digits of the number and the expiry date.
- We do not store the CVV/CVC code. Each transaction using a saved card will require additional confirmation in accordance with the payment service provider's regulations (e.g. 3D-Secure authentication).

2.3. SECURE TRANSMISSION AND STORAGE OF PAYMENT DATA

- We transfer your card details to the payment service provider in an encrypted form, solely for the purpose of processing the transaction.
- You can withdraw your consent to the storage of your card details at any time by deleting the saved card in your account settings.

PURPOSES OF PROCESSING	LEGAL BASIS FOR PROCESSING	DATA RETENTION PERIOD
Enabling purchases in the Online Shop (account registration, placing an order, delivery)	Necessity of processing for the performance of a contract (Article 6(1)(b) of the GDPR). Legal obligation (Article 6(1)(c) of the GDPR)	We store data for as long as necessary to perform the sales contract (until the order is shipped and paid for). After this period, for the time necessary to comply with legal obligations (e.g. tax obligations) or to pursue claims.
Payment processing (one-off payment, transaction verification)	Necessity of processing for the performance of the contract (Article 6(1)(b) of the GDPR).	Until the transaction is completed or any claims related to it expire. The payment service provider may store the data on its own, in accordance with the law.
Saving the card to facilitate future transactions	User consent (Article 6(1)(a) of the GDPR).	Until consent is withdrawn or the card is deleted from the User's profile. Withdrawal of consent does not affect the lawfulness of processing carried out before its withdrawal.
Loyalty programme / additional features (if available)	- Necessary for the performance of a contract (Article 6(1)(b) of the GDPR), if the loyalty programme is part of the Shop's offer. - User consent (Article 6(1)(a) of the GDPR) in the case of selected, optional functionalities.	We process data for the duration of participation in the programme (e.g. until deregistration) and, if necessary, for the period required by law (e.g. tax law). In the case of consent-based data, until consent is withdrawn or the functionality is terminated.
Establishing, pursuing or defending against claims	The legitimate interest of the Controller (Article 6(1)(f) of the GDPR), consisting in the pursuit of or defence against claims	For the time necessary to achieve the purpose, no longer than until the claims become time-barred or until an effective objection is lodged

We use cookies in our Online Shops – the provisions contained in "Part A" of the Privacy Policy regarding cookies on Websites apply mutatis mutandis to Online Shops.

Any additional rules for data processing in VTS Online Shops, including applicable regulations and retention periods, are described in the main part of the Privacy Policy and in the Terms and Conditions of the respective Online Shop. We encourage you to read them carefully before placing an order.

RECUPERATORS

THE CONTROLLER OF THIS PROCESS IS: VTS PLANT SP. Z O.O.

The following rules apply to the processing of personal data in connection with the use of the website (<http://www.homer-ventilation.com/>) and the HOMER Connect mobile application, which concern recuperators.

1. SCOPE OF DATA COLLECTED

Depending on which features of the website or mobile application you use and what information you provide to us, we collect for instance:

- **Personal data provided in forms available on the website** – such as your email address, first name, surname, telephone number, company name, address, country, tax identification number, property details.
- **Log data** – including activity in the application, e.g. changes made to device settings, failure logging, activity history.
- **Device information** – including technical and operational parameters of controlled recuperators (e.g. operating mode, schedules, automation and configuration parameters), location, energy consumption data, alarms and device history.
- **Marketing information** – including data about your end device (e.g. phone model, operating system version, system language) to the extent necessary to display personalised marketing messages, provided you have given your separate consent.

2. VOLUNTARY PROVISION OF DATA

Providing data in the mobile application and on the website is generally voluntary, but some information (e.g. contact details or device information) is necessary to accept a request using the forms available on the website or to launch the application's functionality. Failure to provide this information will prevent you from using the forms and the application.

PURPOSES OF PROCESSING	LEGAL BASIS FOR PROCESSING	DATA RETENTION PERIOD
Provision of services related to the availability and operation of the mobile application (remote control of devices, correct functioning of recuperators, contact with users regarding the operation of the application)	Necessity of processing for the performance of a contract (Article 6(1)(b) of the GDPR)	The data is stored for the period necessary to provide the services. It is deleted at the latest when the application is deleted or the device is reset.
Provision of services by electronic means (in terms of content made available to users on the website, including contact and service forms)	Necessity of processing for the performance of a contract (Article 6(1)(b) of the GDPR); legitimate interest of the Controller (Article 6(1)(f) of the GDPR) consisting in responding to a question raised	The data is stored for the period necessary to provide the services. In the case of personal data processed on the basis of a legitimate interest – for the time necessary to achieve the purpose, no longer than until the expiry of the limitation period for claims or until an effective objection is lodged.
Service and technical support (contact in matters of errors, complaints, faults)	Necessity for the performance of a contract (Article 6(1)(b) of the GDPR); legitimate interest of the Controller (Article 6(1)(f) of the GDPR) consisting in conducting failure analyses	The data is stored for the period necessary to provide support. Upon termination of use of the application, the data is permanently deleted or anonymised, unless there is another legal basis for further storage (e.g. legal provisions). With regard to personal data processed on the basis of a legitimate interest, for the time necessary to achieve the purpose, no longer than until the expiry of the

		limitation period for claims or until an effective objection is lodged.
Analysis and improvement of the mobile application and website (including collecting information about errors and performance)	The legitimate interest of the Controller (Article 6(1)(f) of the GDPR) consisting in ensuring the continuity and development of services	The data is stored for the time necessary for analysis and improvement or until an effective objection is lodged. After the analysis is completed, the data is anonymised or deleted if there is no other basis for processing (e.g. accounting purposes or legal provisions).
Analysis of user activity in the mobile application and on the website	The legitimate interest of the Controller (Article 6(1)(f) of the GDPR), consisting in analysing user activity and their preferences in order to improve the functionalities used and the services provided	Until the end of the use of the services, no longer than until you express an effective objection.
Establishing, pursuing or defending against claims	The legitimate interest of the Controller (Article 6(1)(f) of the GDPR), consisting in pursuing or defending against claims	For the time necessary to achieve the purpose, no longer than until the claims become time-barred or until an effective objection is raised.

We use cookies on the website and in the mobile application related to Recuperators – the provisions contained in "Part A" of the Privacy Policy regarding cookies on the Websites apply mutatis mutandis to Recuperators.

Any additional rules for data processing on the website and in the mobile application concerning Recuperators, including applicable regulations and retention periods, are described in the main part of the Privacy Policy and in the regulations of the website and mobile application. We encourage you to read them carefully before using the services.

CLIMACAD ONLINE 4 (CCOL4)

THE CONTROLLER OF THIS PROCESS IS VTS SP. Z O.O.

The CCOL4 application enables the selection of ventilation and air conditioning units certified by Eurovent. It allows you to create designs by integrating with CAD and REVIT tools as well as CRP, ERP and WMA systems. The application is available from any device with a web browser at <https://vtsgroup.com/pl/climacad>.

1. VOLUNTARY PROVISION OF DATA

Providing data in CCOL4 is generally voluntary, but some information (e.g. email address, password) is necessary to create and maintain an account in CCOL4. Failure to provide this information will prevent you from using CCOL4.

2. DATA RETENTION PERIOD

- We store your account data (e.g. email address, first name, surname) for as long as your CCOL4 account exists. Once your account is deleted, your data is permanently deleted or anonymised.

PURPOSES OF PROCESSING	LEGAL BASIS FOR PROCESSING	DATA RETENTION PERIOD
Provision of services related to the creation and maintenance of an account in CCOL4 (account registration and maintenance, proper functioning of the application, generation of offers)	Necessity of processing for the performance of a contract (Article 6(1)(b) of the GDPR); with regard to data provided on an optional (non-mandatory) basis, the legal basis for processing is consent (Article 6(1)(a) of the GDPR).	The data is stored for the period necessary to provide the services. It is deleted at the latest when the account in the CCOL4 Application is deleted. In the case of optional data, until consent is withdrawn.
Establishing, pursuing or defending against claims	The legitimate interest of the Controller (Article 6(1)(f) of the	For the time necessary to achieve the purpose, no longer than until the

VTS GROUP PRIVACY POLICY

	GDPR), consisting in the pursuit of or defence against claims	claims become time-barred or until an effective objection is lodged
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We may use cookies within the application – the provisions contained in "Part A" of the Privacy Policy regarding cookies on Websites apply mutatis mutandis to the application.

Any additional rules for data processing in the application, including applicable regulations and retention periods, are described in the main part of the Privacy Policy. We encourage you to read them carefully before using the services.

PART B

HANDLING OF REQUESTS AND CONTACT FORMS

THE CONTROLLER OF THIS PROCESS IS: A) VTS sp. z o.o., B) VTS POLSKA SP. Z O.O. OR C) VTS PLANT SP. Z O.O., DEPENDING ON THE SELECTED WEBSITE OR ONLINE SHOP

As part of providing services and communicating with Users, we provide various contact channels, such as online forms, chat, e-mail and telephone. Below are the rules for processing your personal data in connection with handling requests, applications, complaints and other enquiries addressed to us.

1. CONTACT FORMS AND CHAT:

We process the data you choose to provide us with (e.g. first name, surname, e-mail address, telephone number, message content). We use this data to verify the identity of the sender, respond to your enquiries and, at your request, provide you with a commercial offer or information about our services.

2. CONTACT BY TELEPHONE OR E-MAIL:

During telephone conversations and in e-mail correspondence, we collect all information that you voluntarily provide to our employees or representatives. For some hotlines or service lines, calls may be recorded for evidence, training or quality assurance purposes. If you do not consent to recording, you may terminate the call or use another contact channel (e.g. chat, form, email).

PURPOSES OF PROCESSING	LEGAL BASIS FOR PROCESSING	DATA RETENTION PERIOD
Complaint handling	- Necessity for the performance of a contract (Article 6(1)(b) of the GDPR) in the case of requests concerning services or products. - Legal obligation (Article 6(1)(c) of the GDPR) to the extent that the law requires the retention of documentation (e.g. consumer regulations).	We store the data until the complaint has been resolved or for the period specified in the regulations (e.g. limitation period for claims).
Handling of data subject requests	Legal obligation (Article 6(1)(c) of the GDPR)	We store the data until the request is processed or longer if required by generally applicable regulations (e.g. in the case of an ongoing dispute).
Handling of other requests and notifications	The legitimate interest of the Controller (Article 6(1)(f) of the GDPR), consisting in responding to enquiries addressed to it concerning its business activities; in the case of data provided on an optional basis, the legal basis for processing is consent (Article 6(1)(a) of the GDPR).	We store the data until the enquiry has been dealt with or for the period necessary to secure any claims. If the processing is based on your consent (e.g. additional information), we delete the data immediately after you withdraw your consent.
Recording of conversations (if applicable in selected channels)	- Legitimate interest (Article 6(1)(f) of the GDPR) for the purpose of improving the quality of service,	We store recordings for the period necessary to achieve the purposes for which they were collected (e.g.

	documenting findings or securing evidence.	service quality analysis, complaint handling), but no longer than the limitation period for any claims.
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ANALYSIS AND IMPROVEMENT OF SERVICE QUALITY

THE CONTROLLER OF THIS PROCESS IS: A) VTS sp. z o.o. OR B) VTS PLANT SP. Z O.O., DEPENDING ON THE SELECTED WEBSITE, APPLICATION OR WEBSITE

As part of the continuous development and improvement of services within the VTS Group, we conduct various types of analyses, research and tests to ensure you have the best possible experience when using our Websites, Applications (mHMI, ClimaCAD OnLine 4), webpage or mobile application for Online Shop Recuperators and other available solutions. Below we describe how your data is processed in connection with these activities:

1. SCOPE OF DATA COLLECTED FOR ANALYSIS AND SERVICE IMPROVEMENT

- We may analyse data about your activity on our Websites, Applications, webpage or mobile application related to Recuperators and Online Shops (e.g. login frequency, activity history, preferred functionalities).
- We obtain data from, among other sources, cookies, system logs, your transaction history or completed surveys.
- We may also use contact details (e.g. e-mail address, telephone number) to identify you more efficiently on different devices (computer, tablet, smartphone) and tailor functionalities or content to your preferences.

2. CONTACT FOR SATISFACTION SURVEYS

- From time to time, we may ask you for your opinion on our products and services by asking you to participate in surveys or short interviews.
- Participation in surveys is always voluntary, and we use the responses we receive solely to improve our solutions and quality of service.

3. COMMUNICATION ANALYSIS AND RECORDINGS

- To ensure the highest standards of service, we may use recordings of telephone conversations and selected records of correspondence (e.g. from chat, e-mail) during training and internal quality audits.
- We use appropriate security measures, such as pseudonymisation and encryption, to protect your data from unauthorised access.

PURPOSES OF PROCESSING	LEGAL BASIS	DATA RETENTION PERIOD
Analysis of user activity and development of new functionalities (testing, research, improvements)	Legitimate interest of the Controller (Article 6(1)(f) of the GDPR), consisting in the continuous development and improvement of the services offered	The data is processed for the duration of the analyses or tests or until your account is deleted (if the data is linked to your account), but no longer than until you effectively object.
Personalisation of content and customisation of functionality (e.g. by combining activity across multiple devices)	The legitimate interest of the Controller (Article 6(1)(f) of the GDPR), consisting in adapting our solutions to the individual preferences of users	We store the data for the duration of your use of our services or until you delete your account or express an effective objection (if the processing is based on this interest).
Customer satisfaction and opinion surveys	The legitimate interest of the Controller (Article 6(1)(f) of the GDPR), consisting in improving the quality of services	We delete data collected through surveys or interviews after the end of a given research campaign, unless you object or request that the data be deleted earlier.
Use of recordings of conversations and correspondence (training, quality verification)	- Legitimate interest of the Controller (Article 6(1)(f) of the GDPR) consisting in improving the quality of	We store recordings and correspondence only for the period necessary to achieve the above-mentioned purposes (e.g. training,

VTS GROUP PRIVACY POLICY

	customer service and employee development.	internal quality audits), and then we delete or anonymise them, unless there is another legal basis for further processing (e.g. legal regulations).
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MARKETING AND COMMERCIAL COMMUNICATION

THE CONTROLLER OF THIS PROCESS IS: A) VTS sp. z o.o. OR B) VTS PLANT SP. Z O.O., DEPENDING ON THE SELECTED WEBSITE, APPLICATION OR WEBSITE

At the VTS Group, we strive to offer you services and products tailored to your preferences. To this end, we may process your personal data for marketing purposes in accordance with the provisions of the GDPR and other applicable regulations. Below, we explain in which situations and on what basis we process your data for marketing purposes.

1. SCOPE OF DATA COLLECTED FOR MARKETING PURPOSES

- We may use your e-mail address, telephone number and information about your preferences (e.g. industry, position, purchase history or interests) to send you commercial information and offers that may be of interest to you.
- If you use our Applications (mHMI, ClimaCAD OnLine 4), website or mobile application related to Recuperators or Online Shops, we may analyse your activity (e.g. frequency of logins, products viewed, device configurations) in order to tailor marketing communications to your needs.

2. FORMS OF MARKETING COMMUNICATION

- **Email and text messages:** We may send you offers, information about promotions, news and other events related to our business. We send such messages only with your voluntary consent.
- **Push notifications** (if you have them enabled in the Application or Websites): these allow us to send you short messages directly to your phone or browser.
- **Telephone calls:** In certain situations (e.g. to present an individual offer, discuss the details of cooperation), we may contact you by telephone, provided that you have given your separate consent or there is another legal basis (e.g. contact within the framework of an existing contract).

3. ESTABLISHING AND MAINTAINING BUSINESS RELATIONSHIPS

- If you represent business entities (e.g. you are a business owner or a contact person in a company), we may use your contact details (e.g. business e-mail, office telephone number) to establish or maintain business cooperation and to inform you about our services.
- If your data comes from publicly available registers or has been provided to us by third parties, we will endeavour to inform you of the source of the data and provide you with the opportunity to object to further marketing communications.

4. OPTION TO OPT OUT OF MARKETING COMMUNICATIONS

- We include an unsubscribe link in every marketing email. Clicking on this link will stop us from sending you such communications.
- You can also manage your marketing consents in your account settings in the Applications or Online Shops. If you encounter any problems, please contact us via the [Contact Form](#).

5. NEWSLETTER AND ADVERTISING MATERIALS

- If you agree, we will send you a newsletter with information about news, promotions and events organised by the VTS Group.
- You can withdraw this consent at any time by clicking on the unsubscribe link included in each message sent to you or by contacting us in any other way convenient for you.

PURPOSES OF PROCESSING	LEGAL BASIS FOR PROCESSING	DATA RETENTION PERIOD
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VTS GROUP PRIVACY POLICY

Sending proposals and recommendations regarding services or goods (e.g. e-mail offers, text messages)	- User consent (Article 6(1)(a) of the GDPR), if marketing communication requires it (e.g. newsletter, SMS marketing).	We store the data until the marketing consent is withdrawn.
Sending direct marketing communications (e-mails, push notifications, text messages, phone calls)	- User consent (Article 6(1)(a) of the GDPR).	We process the data until consent is withdrawn (if required).
Newsletter and commercial communication	- User consent (Article 6(1)(a) of the GDPR)	We process data until consent to the newsletter is withdrawn.
Establishing business relationships with business entities	- Legitimate interest of the Controller (Article 6(1)(f) of the GDPR), consisting in the promotion of VTS services and offers among potential business partners	We process data for as long as we maintain a potential or ongoing business relationship, or until you effectively object.

PROMOTIONAL CAMPAIGNS AND COMPETITIONS

THE CONTROLLER OF THIS PROCESS IS: A) VTS sp. z o.o. OR B) VTS PLANT SP. Z O.O., DEPENDING ON THE SELECTED WEBSITE, APPLICATION OR WEBSITE

If companies from the VTS Group organise promotional campaigns, lotteries or competitions, you can participate in them by providing your personal data. We process it only to the extent necessary to properly conduct a given promotional campaign or competition. Below we present the basic principles and purposes of personal data processing in this area. Detailed information may also be specified in the rules and regulations of a specific event.

PURPOSES OF PROCESSING	LEGAL BASIS FOR PROCESSING	DATA RETENTION PERIOD
Enabling participation in a competition or promotional campaign (which is not a public promise)	Necessity of processing for the performance of a contract (Article 6(1)(b) of the GDPR)	Until the end of the competition or promotional campaign
Enabling participation in a competition or promotional campaign (which constitutes a public promise)	Legitimate interest of the controller (Article 6(1)(f) of the GDPR) consisting in the performance of obligations arising from the making of a public promise and the organisation of competitions or similar promotional campaigns	Until the end of the competition or promotional campaign

Please note that the rules of individual competitions may specify more detailed rules for the processing of your data (e.g. additional purposes or longer storage periods).

LEGAL, TAX AND ACCOUNTING PURPOSES

THE CONTROLLER OF THIS PROCESS IS: A) VTS sp. z o.o., B) VTS POLSKA SP. Z O.O. OR C) VTS PLANT SP. Z O.O., DEPENDING ON THE SELECTED WEBSITE, APPLICATION OR WEBSITE

In certain situations (e.g. when providing paid services or paying and booking competition prizes), we are required to process your data in accordance with specific legal requirements. The scope and manner of processing is then strictly defined by tax and accounting regulations or anti-money laundering (AML) regulations.

PURPOSES OF PROCESSING	LEGAL BASIS FOR PROCESSING	DATA RETENTION PERIOD
Fulfilment of tax, legal and accounting obligations (including AML obligations)	Legal obligation (Article 6(1)(c) of the GDPR)	6 years or for the period specified in mandatory legal provisions

VTS GROUP PRIVACY POLICY

In such cases, we only process data that is necessary to fulfil the obligations imposed by law (e.g. invoice data, tax settlement data).

SOCIAL MEDIA

THE CONTROLLER OF THIS PROCESS IS: VTS sp. z o.o.

We maintain official profiles of VTS Group companies on various social media platforms (e.g. Facebook, Instagram, LinkedIn, YouTube, X, TikTok). If you visit our profiles and interact with them (e.g. comment on posts, ask questions), we process your data for the following purposes and on the terms specified below:

PURPOSES OF PROCESSING	LEGAL BASIS FOR PROCESSING	DATA RETENTION PERIOD
Maintaining a profile and communicating with users (LinkedIn, YouTube)	Legitimate interest of the controller (Article 6(1)(f) of the GDPR) consisting in promoting our own brand and providing information about our products and services	Until you effectively object to the processing of your data for this purpose or you unfollow the profile on the social media platform

In all such cases, we only process data that you choose to disclose publicly on a given portal (e.g. comments, likes). Please note that the providers of these platforms (e.g. Meta, X, Google) also process users' personal data — the scope and purposes of this processing may differ from ours, so we encourage you to familiarise yourself with their privacy policies.