



PRIVACY POLICY

This privacy policy explains how OXE Marine AB, Swedish company reg. no. 556889-7226, ("**OXE Marine**", "**we**", or "**us**"), when acting as a data controller, processes personal data when you use our services, including connected products such as OXE Connect. Additional privacy information may apply to specific services and is provided in the relevant sections below.

Our policy also outlines your rights under the General Data Protection Regulation (GDPR) and how to contact us if you have questions or wish to exercise your rights.

Please note that this policy does not apply where OXE Marine processes data on behalf of a customer as a data processor, or where a customer acts as an independent data controller.

1 Personal data processed when using OXE Connect

This section applies specifically to the OXE Connect Remote Access Service offered by us, which includes diagnostics, performance monitoring, and optional GPS-based location tracking for products equipped with connected remote modules (the "**Service**").

2 Categories of Data Subjects

In connection with the Service, we may process personal data relating to the following categories of individuals:

"Registered Owners": Individuals who register a product and/or user account for the Service.

"Authorized Operators": Persons authorized by a company or owner to operate or interact with a Product. These individuals may not have a direct contractual relationship with OXE Marine, but their use of the product may result in personal data being collected.

"Customer Representatives": Individuals who act on behalf of legal entity customers, such as importers, distributors, fleet managers, or corporate buyers. These representatives may interact with the Service, or technical support, in their professional capacity.

3 Categories of data collected

In connection with the Service, OXE Marine collects the following types of data. Some of this data constitutes personal data under the GDPR, while other data is collected for technical purposes and does not typically allow identification of any individual.

Please note that no decisions that produce legal effects or similarly significant consequences for you are made solely based on automated processing of this data. All data is used to provide technical support, improve the product, and deliver relevant services — not to make decisions about individuals.

3.1 Personal data

The following categories of personal data may be processed:

- **Device identifiers** – such as the engine serial number and OXE Connect unit number
- **Location data** – GPS coordinates, where location tracking is active



- **User account data** – email address, login credentials, and portal metadata (only if the user has created a portal account)
- **System and access logs** – session activity, configuration changes, and support access records, where linked to a specific user account

3.2 Other data (not generally personal data)

The following data is collected as part of the Service, but is not typically considered personal data, as it does not relate to an identified or identifiable natural person:

- **Technical and diagnostic data** – including engine performance metrics, runtime, fault codes, fuel consumption, and system health status of the Service. This data is used to support product functionality, maintenance planning, and system troubleshooting. It is processed in a way that does not allow identification of individual users, unless combined with other identifying information (such as a registered user account).

4 Purposes of Processing and Legal Basis

OXE Marine processes data collected through OXE Connect for the following purposes. The applicable legal basis under the General Data Protection Regulation (GDPR) depends on the type of data subject and their relationship with OXE Marine.

4.1 Providing core product functionality and remote support

This includes enabling remote diagnostics, troubleshooting technical issues, monitoring engine status, and supporting warranty handling.

For Registered Owners who are party to an agreement with OXE Marine, the legal basis for this processing is performance of a contract (Article 6(1)(b) GDPR).

For Authorized Operators and Customer Representatives, the legal basis is legitimate interest (Article 6(1)(f) GDPR). These interests include ensuring product safety and reliability, fulfilling contractual commitments toward customers, supporting warranty handling, and reducing operational or environmental risks. Data processing is limited to technical and operational data necessary for these purposes and is not used to monitor personal behaviour.

4.2 Operating and maintaining the online user portal

This includes authentication, managing user access, and providing access to system-related information.

Where the user has created an account in their own name (e.g. a Registered Owner), the legal basis is performance of a contract (Article 6(1)(b) GDPR).

For users acting on behalf of a legal entity, such as Fleet Managers or other Customer Representatives, the legal basis is legitimate interest (Article 6(1)(f) GDPR). These interests include enabling secure and efficient service delivery, providing relevant technical information to authorized personnel, and supporting customers' operational needs. The processing relates only to professional use and access control.

4.3 Location-based services and theft protection

This includes viewing GPS location, enabling theft recovery functionality, and providing operational tracking within the Service.



Where GPS services are provided as part of an agreement with an individual registered owner, the legal basis is performance of a contract (Article 6(1)(b) GDPR).

In other cases, including use by Authorized Operators or Customer Representatives, the processing is based on legitimate interest (Article 6(1)(f) GDPR). These interests include protection against theft, emergency response, and efficiency of the Service.

Users may deactivate GPS tracking at any time via OXE Connect.

4.4 Security, logging, and abuse prevention

This includes maintaining access logs, detecting misuse, and monitoring the Service for unauthorized or suspicious activity.

The legal basis for this processing is legitimate interest (Article 6(1)(f) GDPR), which covers OXE's need to protect system integrity and ensure lawful and secure use across all user types.

4.5 Internal product development and fleet analytics

This includes evaluating anonymized or aggregated usage data to improve product design, optimize performance, and support fleet efficiency.

The data processed for these purposes is typically not personal data. To the extent such data could relate to an individual, the legal basis is legitimate interest (Article 6(1)(f) GDPR). These interests include improving product efficiency, safety, and environmental performance.

5 Recipients of the Data

OXE Marine does not sell or otherwise disclose your personal data to third-party controllers, unless specifically requested by you as the registered owner of a particular product or serial number (for example, when requesting service coordination with a third party).

However, in order to operate the Service, OXE Marine uses certain trusted service providers who process data on our behalf. These may include providers of cloud hosting, IT support, analytics, and technical infrastructure.

These providers are considered personal data processors under the GDPR and may only process personal data in accordance with OXE Marine's instructions and applicable data processing agreements (pursuant to Article 28 GDPR).

All such processing is governed by appropriate safeguards, including contractual obligations to ensure security, confidentiality, and compliance with applicable data protection laws.

6 Data retention

OXE Marine retains the Data for as long as the agreement between OXE Marine and the customer remains in force.

Personal data collected via the Service is retained only for as long as necessary to fulfill the purposes described above, unless a longer retention period is required by legal or warranty obligations. Location data (if enabled) is typically retained for 1 year, after which it is anonymized or deleted.

7 Transfer of personal data to a third country

Some personal data processed in connection with the Service may be accessed from or stored in countries outside the European Union (EU) or European Economic Area (EEA). This may



occur, for example, when the product is operated in a non-EU country, when support services are provided from outside the EU/EEA, or when cloud infrastructure is hosted internationally.

OXE Marine ensures that all such transfers are carried out in accordance with Chapter V of the General Data Protection Regulation (GDPR), and that your personal data is protected by appropriate safeguards. Depending on the circumstances, these safeguards may include an adequacy decision by the European Commission under Article 45 GDPR, the use of Standard Contractual Clauses (SCCs) under Article 46 GDPR, or other lawful transfer mechanisms that provide an essentially equivalent level of protection. The latest version of the SCCs is available on the European Commission's website [here](#).

Where personal data is transferred to the United States, OXE Marine may rely on the recipient's certification under the EU–U.S. Data Privacy Framework, which has been recognized by the European Commission as providing an adequate level of protection.

In certain specific cases, where no adequacy decision or other appropriate safeguards are available, OXE Marine may rely on one of the derogations set out in Article 49 GDPR. For example, a transfer may be necessary for the performance of a contract between OXE Marine and the data subject, such as when providing remote diagnostics or support in connection with a product located outside the EU/EEA.

You are welcome to contact us if you would like more information about the safeguards that apply to international transfers of personal data.

8 Your rights as a data subject

The following section outlines the rights you may have regarding OXE Marine's processing of your personal data. To exercise these rights, please contact OXE Marine via the contact details provided below. Please note that, if necessary to verify your identity, OXE Marine may request appropriate identification documents.

8.1 Right of access

You can request to be informed whether OXE Marine is processing personal data relating to you and, if so, to be provided with a copy of that data along with further information. In certain circumstances, there may be information about you that you are not permitted to access, for example, if other laws or exceptions prevent certain information from being disclosed.

8.2 Right to rectification

If you believe that the personal data concerning you is inaccurate or incomplete, you can request that it be corrected or completed.

8.3 Right to object

If OXE Marine cannot demonstrate compelling legitimate grounds to continue processing the data, OXE Marine must cease processing.

8.4 Right to restriction

In certain cases, for instance if you have objected to the processing, you have the possibility to request the restriction of the processing of your personal data.

8.5 Right to erasure ("right to be forgotten")



In some cases, you have the right to request that OXE Marine erase personal data concerning you.

8.6 Right to data portability

Under certain conditions (including technical feasibility), you may have the right to data portability, i.e. to obtain and transfer your personal data to another controller.

8.7 Right to complain

If you have any complaints regarding OXE Marine's processing of personal data, you have the right to lodge a complaint with the Swedish Authority for Privacy Protection (SW: Integritetsskyddsmyndigheten). For their contact details, please visit www.imy.se.

9 Contact information

For questions about this privacy notice or to exercise your rights, please contact us at info@oxemarine.com
