

VEGVISIR PRIVACY POLICY

This privacy policy (hereinafter the “**Privacy Policy**”) governs how Vegvisir (Defensphere OÜ) (hereinafter „**Vegvisir**”/”**us/we/our**”) gathers and uses personal data. We take security of personal data processing seriously. Our aim is to protect the privacy of our clients’, cooperation partners’ and other data subjects’ (together herein after “**you**”). Please read this Privacy Policy as it contains important information about the processing of your personal data.

This Privacy Policy applies to all of our services and products and to our online activities incl., processing in connection to our website and social media.

If you have additional questions or require more information about our Privacy Policy, do not hesitate to contact us (see clause 2.2).

1. DEFINITIONS

Definitions are terms often used in the Privacy Policy. Terms are defined in this Section of the Privacy Policy or in the text of the Privacy Policy.

- 1.1 Personal data protection terms have the same meaning as defined here or in the General Data Protection Regulation (2016/679) (hereinafter the “**GDPR**”).
- 1.2 **Client** means a legal person entering into a Contract with us or using our Services. In case of a legal person data subject’s rights are applicable to the representative of the legal person (e.g., employee, management board member etc.).
- 1.3 **Cookies** mean data files stored in the Visitor’s device upon visitation of the Website according to the selection made. More information about the use of Cookies by us and on our Website can be found via the Cookie solution on our Website.
- 1.4 **Contract** means any contract entered into between us and a Client or any other data subject, incl. terms of use and other agreements etc.
- 1.5 **Privacy Policy** means this text, which sets out our principles of personal data processing.
- 1.6 **Service(s)** means services offered by us, e.g., Mixed Reality Situational Awareness System (MRSAS) that provides personnel of armoured vehicles a better understanding of their immediate surroundings and areas of interest further away, and other services/products by us (if any). **In case of the MRSAS we do not have access to any data gathered via the MRSAS.**
- 1.7 **Visitor** is a person visiting our Website.
- 1.8 **Website** means our website accessible via <https://www.vegvisir.ee/> and all its subdomains and where applicable also refers to our social media pages.

2. GENERAL INFORMATION AND CONTACT DETAILS

Here you will find when the Privacy Policy applies, information about who we are, and how to contact us.

- 2.1 **About us.** We are a private limited company Defensphere OÜ, registration code 16145864, address Pärnu mnt 105, 11312 Tallinn, Harju county, e-mail info@vegvisir.ee. Vegvisir is a Mixed Reality Situational Awareness System (MRSAS) that provides personnel of armoured vehicles a better understanding of their immediate surroundings and areas of interest further away.
- 2.2 **Contacts.** You can contact us in matters related to personal data processing by e-mailing us at info@vegvisir.ee or writing to us on the address provided in the previous clause i.e., 2.1 and addressing the letter as personal data inquiry.

- 2.3 **About the Privacy Policy.** The Privacy Policy applies to personal data processing done by us in case of our Services, Website and candidates. We have the right to unilaterally amend this Privacy Policy. We will notify the data subject of all important material changes on the Website or otherwise.
- 2.4 **About the Controller-Processor statuses.** We are the controller of your personal data when you are a Client (representative of a legal person) or a Visitor. In case of our Service - MRSAS we do not have access to any data gathered via the MRSAS. Read more about disclosures and transfers in Section 7.
- 2.5 **Other links/apps etc. Please note,** that the links on our Website may lead to media that is governed by privacy terms of the respective service providers', and not by this Privacy Policy. We are not responsible for anything on those other websites. Processing of your personal data on our social media channels by providers of those platforms is done according to the privacy terms of relevant platform. In case of our social media, we will adhere to the relevant platform's terms and to this Privacy Policy.

3. PRINCIPLES OF PERSONAL DATA PROCESSING

Here you will find the key principles that we are always guided by when processing your personal data.

- 3.1 **Compliance and aim.** Our aim is to process personal data in a responsible manner where we are able to demonstrate the compliance of personal data processing with the purposes set and the applicable regulations.
- 3.2 **The principles.** All our processes, guidelines and activities related to personal data processing are based on the following principles: lawfulness, fairness, transparency, purposefulness, minimisation, accuracy, storage limitation, integrity, confidentiality, and data protection by default and by design.

4. INFORMATION WE PROCESS

Here you can find categories of data subjects and personal data we process.

- 4.1 **Categories of Data Subjects.** Generally, we may process personal data of the following data subjects:
- (a) our Client's representatives and employees;
 - (b) representatives of our cooperation partners;
 - (c) our employees or contractors;
 - (d) Website Visitors;
 - (e) candidates.
- 4.2 **Collection of Personal Data.** We collect the following types of personal data:
- (a) Personal data disclosed to us by the data subject (e.g., data submitted for the purpose of entering into contract or obtaining information about our Service(s). Usually - name, contact details, e-mail address, data sent or made available to us by the data subject);
 - (b) Personal data resulting from standard communication between us and the data subject (e.g., correspondence regarding the Service(s) and Contract);
 - (c) Personal data resulting from visiting and using the Website (device data, IP address, data gathered by Cookies - see Cookie solution on our Website for more precise information);
 - (d) Personal data obtained from third parties (e.g., when doing KYC on the Client, data from use of third-party services);
 - (e) Personal data provided to us by our Client;

- (f) Personal data generated and combined by us (e.g., correspondence within the context of Client relationship, activity analytics).

4.3 Data we process. We mainly process the following personal data:

- (a) About Visitors - data gathered from use of Website incl., by Cookies (if enabled);
- (b) Our Client's representatives or Client identification data - name, date of birth, ID-code, address, contacts, KYC and AML checks data (sanction check, adverse media, Client's BO);
- (c) contact data - e-mail, phone nr, address;
- (d) Contract and billing data;
- (e) communications - communications with us (emails, sms, chats, calls);
- (f) video recording (if any) e.g., when data subjects visit our premises (the surveillance recording);
- (g) Other data - e.g., provided in the feedback surveys, testing etc.;
- (h) Candidate data - full name, personal identification code, contact details (tel.nr, e-mail, address), information provided in the CV, including education, qualifications, people marked as recommenders, previous experience, aptitude tests (if applicable), background check (if applicable). See also Section 10.

5. GENERAL PURPOSES, GROUNDS FOR, AND ACTIVITIES OF PROCESSING

Here you will find information about the purposes and grounds for processing of your personal data.

- 5.1 Consent.** Based on consent, we process personal data precisely within the limits, to the extent and for the purposes for which the data subject has given their consent. The data subject's consent must be freely given, specific, informed, and unambiguous, for example, by ticking the box on the Website. Please note that you have the right to withdraw your consent at any time. Withdrawal of consent will not influence the rightfulness of personal data processing done under the consent before the withdrawal of the consent.

- 5.2 Entry into and performance of a Contract.** Upon entering into and performing a Contract, we may process personal data for the following purposes:

- (a) taking steps prior to entering into a Contract, which are necessary for entering into a Contract or which the data subject requests (mainly data marked at clause 4.3(b), c, d and e are used);
- (b) identifying you to the extent necessary for entering into and performing a Contract or taking steps to enable usage of our Service (mainly data marked at clause 4.3(b), c, d and e are used);
- (c) performing the obligations assumed (e.g., billing) (e.g., data marked at clause 4.3(b), c, d, e are used);
- (d) communicating with you, incl. sending information and reminders about the performance of the Contract or about the usage of the Service (e.g., data marked at clause 4.3(b), c, d, e are used);
- (e) protection of rights and claims (depending on the data all gathered data may be used);
- (f) to detect, prevent and address technical issues (depending on the issue all gathered data may be processed);
- (g) to provide Client support (mainly data marked at clause 4.3(b), c, d, e are used, but depending on the issue all data may be processed);
- (h) to notify you about changes to our Service or to give you other Contract/Service related notice (mainly data marked at clause 4.3(b) and c are used).

Please note that, personal data processing specifics may be regulated in the Contract and accompanying data processing agreement.

- 5.3 **Legal obligation.** We process personal data to comply with a legal obligation in accordance with and to the extent provided by law. For example, obligation to retain accounting documents from Estonian Accounting Act, obligations in connection to the Strategic Goods Act (data about sales of strategic goods) and the International Sanctions Act (KYC, AML data).
- 5.4 **Legitimate interest.** Our legitimate interest means our interest in managing or directing our activities and enabling us to offer the best possible Services. In case we are using legitimate interest, we have previously assessed our and your interests. You have the right to see conducted assessment connected to processing of your personal data. If you wish to do so contact as at info@vegvisir.ee. We may process your personal data (except special categories of personal data) based on legitimate interest for the following purposes:
- (a) **managing and analysing our client database and Services** (if not covered with the Contract) to improve the availability, functions and quality of Service(s), e.g., using a CRM or analytics solutions to enable the foregoing (mainly identification data and contact data is used);
 - (b) **development of our Website** (mainly anonymous; however, depending on the development all data may be used);
 - (c) **ensuring a better client/user experience**, to provide higher quality service; we may monitor the usage of our Website, analyse identifiers and personal data collected when our Website, our social media pages and other sales channels are used, and we may collect statistics about Clients, users and Visitors; usage data and technical data may be processed;
 - (d) **sending offers/information to the Client or potential client** if the respective person has previously purchased or shown interest in a similar product/service, and if such processing is allowed in respective jurisdiction. In this case, the person is always guaranteed to have a simple opportunity to resign from the communication, and we have considered our and the (potential) client's interests;
 - (e) **making recordings and logging**; we may record messages and orders given both in our premises and using means of communication (e-mail) as well as information and other activities we have performed. If necessary, we use these recordings to prove orders, claims or other activities;
 - (f) **video surveillance recordings** for security, protection of people and property and proof and protection of claims;
 - (g) **technical and cyber security reasons**, for example measures for combating piracy and ensuring the security of the Website as well as for making and storing back-up copies and preventing/repairing technical issues (depending on the issue all data may be processed);
 - (h) **processing for organisational purposes and service provision between group companies**, foremost for service provision and management purposes (but also audits and other potential supervision), including for processing the personal data of Clients or representatives (mainly anonymized, however Client data identification and Contract data may be processed);
 - (i) **establishing, exercising or defending legal claims**, incl. assigning claims to, for example, collection service providers, or using legal advisors (depending on the claim/issue all data may be processed);
 - (j) **Processing in the context of commercial transactions** - mergers, acquisitions, purchase, sale of an association or of shares - processing of data in the framework of carrying out a transaction and consulting (all data may be processed);
 - (k) If you have given us information about not sending you a certain type of information - retaining the information about such prohibition.
- 5.5 **New purpose.** Where personal data is processed for a new purpose other than that for which the personal data are originally collected or it is not based on the data subject's consent, we carefully assess the permissibility of such new processing. We will, in order to ascertain whether processing for a new purpose is compatible with the purpose for which the personal data are initially collected, take into account, inter alia:

- (a) any link between the purposes for which the personal data are collected and the purposes of the intended further processing;
- (b) the context in which the personal data are collected, in particular regarding the relationship between the data subject and us;
- (c) the nature of the personal data, in particular whether special categories of personal data are processed or whether personal data related to criminal convictions and offences are processed;
- (d) the possible consequences of the intended further processing for data subjects;
- (e) the existence of appropriate safeguards, which may include encryption or pseudonymisation.

5.6 Overview of our main personal data processing activities in the scope of this Privacy Policy:

Purpose	Legal basis	Personal data (please see categories in clause 4.3)
Offering Services – contact form on the Website	GDPR art 6 (1) b	Email, data inserted to the contact form
Processing of personal data for entering into contract	GDPR art 6 (1) b	Please see clause 5.2
Data transfer to the service providers necessary for entering into the Contract	GDPR art 6 (1) b	Counterparties and partner companies i.e. intermediaries – Client's representative information, including KYC and AML data about the representative and the Client (if applicable)
Personal data in the MRSAS – ONLY if specific testing case has been agreed upon	GDPR art 6 (1) f (if the testing, development is done generally for Service development); if the testing/development is done for a specific Client – then we are a processor and use same legal grounds as the Client	Only live data, and feedback from users (drivers)
Customer support	Contract (GDPR Art. 6 (1) (b)) for support activities related to the Contract; other contacts (GDPR Art. 6 (1) (a)) if the data subject contacts Vegvisir	As a general rule, the information that the data subject has transmitted. However, depending on the situation, all personal data may be processed.

Marketing and providing better service - conducting market analysis, other analytics and making statistics Anonymization may also be used	GDPR art 6 (1)(f)	Data about Visitors
Newsletters and offers	Consent (GDPR Art. 6 (1) a) or legitimate interest + ESS § 103 prim (3) (existing Client and similar service)	email, consent information; in case of legitimate interest: name, e-mail, fact of being a Client, the fact of consuming a similar Service
Service and IT development – improve existing and develop new services and solutions, test technical solutions Anonymization is also used	GDPR art 6 (1) f	Generally anonymous, Visitor data may be processed or Client representative data
Necessary processing related to legal obligations, incl. sanction checks and strategic goods sales and movement information	GDPR art 6 (1) c	All personal data may be processed
Data exchange within the group for the following purposes: service provision, administration, management, supervision, auditing, accounting Anonymization may also be used	GDPR art 6 (1) f; and in case of obligatory transfer GDPR art 6 (1) c)	Generally non-personalized, but depending on the purpose, personal data may also be processed, e.g. in accounting information
To certify and defend claims based on the performance of a Contract or other legal obligation or based on our legitimate interest, e.g. to prepare and respond to legal claims, inquiries, etc.	GDPR art 6 (1) f	All personal data may be processed
Fraud detection and prevention	GDPR art 6 (1) f	All personal data may be processed
Ensuring cybersecurity and technical standards – activities to ensure the security of the web and technical solutions, including making and storing backup copies and preventing/eliminating technical problems	GDPR art 6 (1) f; and in case of the Service GDPR art 6 (1) b	All personal data may be processed
Security and proof of claims – use of video recordings	GDPR art 6 (1) f	Information on video recordings, however, all personal data may be

		processed depending on the situation
Processing in the context of commercial transactions - merger, acquisition, purchase, sale of an association or of shares - processing of data in the framework of carrying out a transaction and consulting Anonymization may also be used	GDPR art 6 (1) f	Generally non-personalized, but accounting information may also be processed and, depending on the transaction, the processing of all personal data may be necessary
Other processing under legitimate interest	GDPR art 6 (1) f	See clause 5.4
Processing of a candidate data for entering into employment or similar contract	GDPR art 6 (1) b	Candidate data

6. ABOUT OUR SERVICE - MRSAS

- 6.1 In case of our Service - Mixed Reality Situational Awareness System (MRSAS), we do not have access to any data gathered via the MRSAS.
- 6.2 In certain cases, we may agree with our Client in testing the MRSAS system for testing and development purposes - in which case if we process any personal data for our Client we are processors of personal data and use the same legal basis as our Client. If use same personal data for general Service development, then we use legitimate interest as our legal basis. This is done only in a pre-agreed manner and environment.

7. TRANSFER AND AUTHORISED PROCESSING OF PERSONAL DATA

Here you will find information about the transfer and authorised processing of personal data.

- 7.1 **Usage of cooperation partners.** We may cooperate with persons to whom we may transmit data, including personal data. We may have different type of controller-processor-sub-processor relationships with those cooperation partners. When transferring personal data to third parties (generally our cooperation partners), we comply with the applicable data protection requirements.
- 7.2 **Requirements for the usage of cooperation partners that are our processors.** Such third parties may include:
- 7.2.1 advertising and marketing partners (Visitor's data, contact data);
 - 7.2.2 advisers e.g., financial adviser, tax (depending on the case connected data);
 - 7.2.3 IT partners, i.e., service providers for various technical services (only data about employees and cooperation partner's representatives);
 - 7.2.4 CRM - client data, employee data;
 - 7.2.5 Cybersecurity service provider (all data may be processed);
 - 7.2.6 Accounting service provider (mainly Client representative's data, billing data).
- We may use such processors provided that the respective purpose and processing are lawful and personal data are processed pursuant to the instructions of us and on the basis of a valid data processing agreement.

If you wish to get more information about which processors we may give your personal data, please contact us at info@vegvisir.ee.

7.3 Other transfers. In other cases, we may transmit your personal data to third parties provided that we have a valid ground to do so e.g., your consent or a legal obligation or there is an exception in the event that the transfer is necessary to protect your vital interests.

7.3.1 We may disclose your personal data:

- (a) **Connected service providers** who are separate controllers - e.g., payment service providers, attorneys, banks etc.;
- (b) **For Law Enforcement and other public authorities.** Under certain circumstances, we may be required to disclose your personal data if required to do so by law or in response to valid requests by public authorities. We always assess the lawfulness of information requests before disclosing any personal data. We may also be obligated to provide certain data due to a legal obligation e.g., obligations from the Strategic Goods Act.
- (c) **For Business Transactions.** If we or our subsidiaries are involved in a merger, acquisition or asset sale, your personal data may be transferred.

7.4 Transfers outside the EEA. We may use service providers/co-operation partners from outside the EEA. Such transfers are only commenced if requirements from the GDPR Chapter V are met e.g., adequacy decision* (see the GDPR art 45) or EU SCC (see the GDPR art 46). We usually use EU standard contractual clauses** or EU-US Data Privacy Framework*** for transferring your personal data outside of the EEA. We will take all the steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy. If you want more information about transfers outside the EEA, contact us at info@vegvisir.ee.

* Adopted adequacy decisions can be found [here](#).

** You can find the text of standard contractual clauses [here](#).

*** Participants of the EU-US Data Privacy framework can be found [here](#).

8. STORAGE AND SECURITY OF PROCESSING PERSONAL DATA

Here you will find a description of how we protect your personal data and for how long we store personal data.

8.1 Storage. We comply with the purpose of processing principle and have set storage periods for personal data, e.g., we use claim limitation periods set in applicable law for potential claims, and storage periods provided for in the law. We store personal data as long as need depending on the purpose of the processing. Client data is generally retained, for the duration of the period of validity of the Contract and additional 10 years as it is obligatory in the Strategic Goods Act. Certain personal data is stored depending on the requirement deriving from applicable law e.g., 7 years accounting data, 10 years data of employment contracts. Personal data for which the storage period has expired are destroyed or made anonymous. If you want more precise information on data retention then write to us at info@vegvisir.ee.

8.2 Security measures. We have established guidelines and rules of procedure on how to ensure the security of personal data through the use of both organisational and technical measures. Among other, we do the following to ensure security and confidentiality:

- (a) We have access-level management system in use;
- (b) We process the personal data transferred to us only for the purpose and to the extent necessary for providing the Website and/or Services; and other purposes laid out in this Privacy Policy;

- (c) we use software solutions that help ensure a level of security that meets the market standard.

8.3 **Incident.** In the event of any incident involving personal data, we do our best to mitigate the consequences and alleviate the relevant risks in the future. We will follow notice requirements of the GDPR.

9. GDPR DATA PROTECTION RIGHTS

Here you can read about your rights in connection to your personal data.

9.1 We would like to make sure you are fully aware of all of your data protection rights. Every data subject is entitled to the following rights (under certain preconditions):

- (a) **The right to access** - you have the right to access and to request copies of your personal data.
- (b) **The right to rectification** - you have the right to request that we correct any information that is inaccurate.
- (c) **The right to erasure** - you have the right to request that we erase your personal data, under certain conditions (e.g., we are processing your personal data under your consent).
- (d) **The right to restrict processing** - you have the right to request that we restrict the processing of your personal data, under certain conditions (e.g., we are processing your personal data under consent).
- (e) **The right to object to processing** - you have the right to object to our processing of your personal data, under certain conditions (e.g., we are processing your personal data under legitimate interest).
- (f) **The right to data portability** - you have the right to request that we transfer the data that you have provided us to another organization, or directly to you, under certain conditions.
- (g) **Rights in connection to consent**- if we process your personal data using consent as legal basis, then you have the right to withdraw your consent at any time (e.g., by unsubscribing or emailing us). Withdrawing your consent won't change the legality of processing done before withdrawal.
- (h) **Rights in connection to use of legitimate interest** - if we process your personal data under legitimate interest, then you have the right to see the conducted legitimate interest assessment connected to the processing of your personal data. For this write us at info@vegvisir.ee.
- (i) **Rights related to automated processing** and profiling mean that the data subject, on grounds relating to their particular situation, has the right to object at any time to the processing of personal data concerning them based on automated decisions/profiling and to require human intervention. The data subject may also require an explanation regarding the logic of making an automated decision. For avoidance of doubt, we do not use automated processing or profiling that has a significant effect on the data subject or their rights. Our Services may use automated processing, but we are not the controllers of such processing (if any).
- (j) **The right to file a complaint and seek judicial remedy** - you have the right to file a complaint with us or supervisory authority or court if you think that your rights in connection to personal data have been infringed. **We kindly ask you to contact us first for finding a solution.** If needed our data protection supervisory authority is Estonian Data protection Inspectorate (Andmekaitse Inspektsioon) contacts can be find: <https://www.aki.ee/en/contacts>. In addition, as a data subject you have a right to file a complaint in the EU Member State of your residence or a place of work or of where alleged infringement of the GDPR took place. If you are a resident of EU, you can find the details of respective data protection authority from [here](#).

9.2 **Responses and additional information.** If you make a request connected to personal data processing, we have one month to respond to you (in certain cases we have the right to extend

that time period). If you would like to exercise any of these rights or need more information on your rights, please contact us. Please note, that we may need to identify you before granting you any of the rights connected to your personal data.

10. CANDIDATES

- 10.1 In the application procedure, we may process the candidate's personal data in order to assess the candidate's suitability for the chosen position and take pre-contractual measures and conclude a (employment) contract. The measures for concluding a (employment) contract in the application process are carried out on a contractual basis (Art. 6 (1) b GDPR), which also includes pre-contractual processing to the required extent). The processing of the personal data of an applicant for a job position generally includes the following:
- 10.2 processing of personal data transmitted by the job applicant/candidate to us for the purpose of concluding an employment or similar contract (name, personal identification code, information provided in the CV, incl. education, previous work experience, etc.) (basis contract);
- 10.3 processing of the data indicated by the candidate e.g., data from the recommenders or data provided by the previous employer (if the candidate has provided the information of the references himself/herself - consent; legitimate interest in other cases);
- 10.4 aptitude test and background check (if applicable) (name, personal identification code, test results, criminal record information, references information; grounds for legitimate interest);
- 10.5 processing of personal data collected from national databases and registers and public (social) media (if applicable) (basis for contractual verification of information; otherwise legitimate interest).
- 10.6 we may use recruitment service providers and software in the recruitment process. Depending on the recruitment service, the first contact may be based on consent (e.g. the candidate has given their consent to the service provider, with permission to transfer their data; the processing required to enter into the contract or our legitimate interest).
- 10.7 If the candidate is not selected for the position, we may keep the collected personal data in order to make a job offer to the candidate, when a suitable job position becomes vacant. The basis of such processing is the legitimate interest. Candidate always has the right to deny such processing.

11. CHILDREN'S INFORMATION

- 11.1 We do not intend to process data of people under age. Our Services are not offered to people under age. We follow data protection requirements applicable for processing child's personal data (if any).

12. CHANGES

- 12.1 The latest changes and entry into force of the Privacy Policy:

Publication	Entry into force	Key changes
25.09.2025	25.09.2025	1 st version of the Privacy Policy