



# *Privacy Statement for Users of Optics11 Products*

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## Document information

### Document Revision History

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Issue	Issue date	Author	Change
Rev0.1	22/04/2025	D. de Azevedo, Oscar Disch	New Document, Proposal version (Pending legal review)

### Confidentiality

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The contents of this document are subject to our NDA and therefore confidential with no information to be disclosed to any third parties without prior consent of Optics11 B.V. (Amsterdam, The Netherlands).

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# 1 Privacy Statement for Business Partners and Visitors

## 1.1 Purpose

This Privacy Statement outlines how Optics11 collects, uses, discloses, and protects personal data in accordance with applicable privacy and data protection laws, including the General Data Protection Regulation (GDPR). Our commitment is to safeguard user privacy while enabling the delivery of high-performance sensing solutions.

## 1.2 Scope

This statement applies to all users of Optics11 products and services, including hardware, software platforms, support tools, and digital interfaces. It is relevant to data processed both directly by Optics11 and through its authorized third-party service providers.

# 2 Collection of Personal Data

Depending on your interaction with our products and services, we may collect personal data from users through:

- Product registration and usage
- Customer support interactions
- Online portal, platforms access
- Feedback forms, surveys, or marketing activities

Collected data may include:

- Name, contact details, Organization, Company name, phone number
- Device and user identifiers, License key (Software based)
- Product usage logs
- Purchased equipment details
- Communication metadata
- Email address (if provided for support or licensing)
- Username and password (encrypted)
- Shipping/ billing addresses
- Invoices and billing history

### 3 Use of your personal data

Personal data is processed for the following purposes:

- Providing and improving products and services
- Managing licensing, user access, accounts, and tenant configurations
- Providing technical support and customer service
- Processing payments and maintaining billing records
- Improving system reliability, security, and performance
- Meeting regulatory and contractual obligations
- Sending important service communications
- Communicating updates and marketing, where consented

### 4 Legal Basis for processing

Our data processing activities rely on the following lawful bases:

- Contractual necessity (e.g. providing access to our products/ services or issuing licenses)
- Legitimate interests (e.g. maintaining security and product support)
- Legal obligations (e.g. tax and billing compliance)
- Consent (e.g. for receiving optional updates or newsletters)

All processing is conducted in accordance with lawful bases as defined in Article 6 of the GDPR.

### 5 Data Retention and Disposal

Personal data is retained only as long as necessary to fulfill the stated purposes and in compliance with legal, contractual, or regulatory requirements. Data is securely deleted or anonymized when no longer needed.

### 6 Data Sharing and Transfers

We do not sell personal data. It may be shared with:

- Affiliated companies and authorized partners
- Cloud or infrastructure providers under strict contractual obligations
- Regulatory authorities, if required by law

All data transfers, especially those outside the EEA, are safeguarded with appropriate contractual mechanisms such as Standard Contractual Clauses.

## 7 Data Subject Rights

Under GDPR, users have rights including:

- Access to their personal data
- Rectification of inaccuracies
- Erasure ("right to be forgotten")
- Restriction or objection to processing
- Data portability

Requests can be directed to our Data Protection Officer at [info@optics11.com].

## 8 Security Measures

We employ technical and organizational measures in line with ISO/IEC 27001:2022 and ISO/IEC 27002:2022 standards, such as:

- Encryption
- Role-based access controls
- Regular risk assessments
- Secure software development and change management

## 9 Incident Response

In the event of a data breach, affected users will be notified without undue delay, in compliance with legal requirements, including GDPR Article 33 and 34.

## 10 Updates

This Privacy Statement may be updated to reflect changes in our practices, technologies, or legal obligations. Users will be notified of material updates through appropriate channels.



#### **CONTACT INFORMATION**

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