



PRIVACY POLICY

DEMVOL d.o.o.

Version: 1.1

Effective Date: April 30, 2026

1. MISSION STATEMENT AND AGREEMENT

At DEMVOL d.o.o. (“we”, “us”, “our”, or the “Company”), we are committed to protecting the privacy and security of your personal data. When you use our services, you trust us with your information. This Privacy Policy is meant to help you understand what data we collect, why we collect it, and what we do with it.

This policy is drafted in accordance with the **General Data Protection Regulation (EU) 2016/679 (GDPR)**, the **Slovenian Data Protection Act (ZVOP-2)**, and the **Electronic Communications Act (ZEKom-2)**.

By using our website, purchasing our IoT hardware, or installing our proprietary browser extensions, you agree to the terms of this Privacy Policy. If you do not agree with these terms, please do not use our products or services.

2. DATA CONTROLLER

The entity responsible for processing your personal data (the "Data Controller") is:

DEMVOL d.o.o.

Zalisec 8, 8360 Žužemberk, Slovenia

Email: info@demvol.com

Website: www.demvol.com

Under Slovenian law (ZVOP-2), we ensure the lawfulness and transparency of all processing activities through our headquarters in Slovenia.

3. DEFINITIONS

To ensure clarity, we use the following definitions aligned with Article 4 of the GDPR :

- **Personal Data:** Any information relating to an identified or identifiable natural person (“data subject”).
- **Processing:** Any operation performed on personal data, such as collection, storage, adaptation, or erasure.
- **Controller:** The entity that determines the purposes and means of processing personal data.
- **Pseudonymisation:** Processing data so it can no longer be attributed to a specific subject without additional information kept separately.



4. CATEGORIES OF INFORMATION WE COLLECT

We categorize information into three main types: Personal, Traffic, and Aggregate Information.

4.1 Personal Information Provided by You

- **Contact and Inquiry Data:** Name, surname, and email address provided via contact forms to respond to your queries or provide technical support.
- **Business (B2B) Data:** Identifiers such as company name, tax ID, and the name/surname of authorized contact persons for fulfilling contractual agreements.
- **Recruitment Data:** CVs and application details. Under ZVOP-2, we treat candidates aged 15 and over as capable of providing their own consent for information society services.

4.2 IoT Device Telemetry (Traffic Information)

Our IoT devices are designed for industrial monitoring and logistics optimization. We collect:

- **Unique Device Identifiers (UID):** To recognize and manage hardware within our infrastructure.
- **Precise Geolocation Data:** Real-time location of installed devices to enable core logistics and tracking functionality.
- **Technical Telemetry:** Data regarding battery levels, signal strength, and environmental sensor measurements (e.g., temperature).

4.3 Browser Extension Data

Our Google Chrome Extension processes data as follows:

- **On-Page Plate Identification:** The extension scans active browser tabs to identify truck license plate numbers. These are used solely as real-time query parameters to display associated records from our internal database.
- **Encrypted Session Management:** We store encrypted session tokens in **Local Storage**. Per ZEKom-2, this is considered "strictly necessary" for the service explicitly requested by the user (authentication).
- **Privacy Guard:** We do not collect browsing history, third-party cookies, or any personal information unrelated to the identified logistics data.

4.4 Aggregate Information

Information that cannot be used to identify you personally. We reserve the right to use and disclose such aggregate data to partners for analyzing usage patterns and improving our products.

5. LEGAL BASIS FOR PROCESSING

We process your data only when we have a valid legal ground under Article 6 of the GDPR :



- **Performance of a Contract:** Necessary to provide IoT services, fulfill orders, and enable browser extension functionality.
 - **Legitimate Interests:** To ensure network security, provide technical support, and improve our services, provided these do not override your fundamental rights.
 - **Compliance with Legal Obligations:** To comply with Slovenian tax, accounting (ZGD-1), and anti-fraud regulations.
 - **Consent:** Applied when you subscribe to our newsletter or agree to let us store your CV for future openings.
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6. DATA SHARING AND THIRD-PARTY PROCESSORS

We do not sell or trade your personal data. We disclose data only to trusted service providers who operate under strict Data Processing Agreements (DPA) :

- **Cloud Infrastructure: AWS (Amazon Web Services)** – Data is hosted on secure servers located within the **European Union (Frankfurt Region)** to ensure GDPR compliance.
 - **Business Operations: Odoo S.A.** – Used for internal CRM and ERP management.
 - **Web Analytics: PostHog** – Used for anonymized usage analysis. We utilize IP-masking and host data within the EU jurisdiction to protect your anonymity.
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7. DATA RETENTION

In accordance with the "storage limitation" principle, we retain information only for as long as necessary :

- **Accounting/Tax Data:** Kept for **10 years** following the end of the fiscal year, as required by Slovenian law.
 - **IoT & Extension Data:** Retained for the duration of your active subscription or until you request account deletion.
 - **Job Applications:** Deleted within **30 days** post-recruitment unless you provide explicit consent for a **2-year** retention period in our talent pool.
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8. SECURITY MEASURES

We implement "Privacy by Design and Default" (Article 25 GDPR). This includes :

- **SSL/TLS Encryption** for all data in transit.
- **Encryption-at-rest** for sensitive database records and device telemetry.
- **Access Control:** Data is restricted to authorized personnel with a documented "need-to-know."
- **Processing Logs:** Per ZVOP-2, we maintain logs of processing activities in automated systems to ensure internal traceability.



9. YOUR DATA PROTECTION RIGHTS

Under the GDPR and ZVOP-2, you have the following rights :

1. **Right of Access:** Obtain a copy of the personal data we hold about you.
2. **Right to Rectification:** Request correction of inaccurate or incomplete data.
3. **Right to Erasure ("Right to be Forgotten"):** Request deletion of your data when it is no longer necessary.
4. **Right to Restrict Processing:** Limit how we use your data in specific circumstances.
5. **Right to Data Portability:** Receive your data in a structured, machine-readable format.
6. **Right to Object:** Object to processing based on legitimate interests or for direct marketing.

To exercise these rights, email us at info@demvol.com. We will respond within **one month**. You also have the right to lodge a complaint with the **Slovenian Information Commissioner** (Informacijski pooblaščenec), Dunajska cesta 22, 1000 Ljubljana.

10. INTELLECTUAL PROPERTY AND INDEMNITY

All content on our website and within our software solutions (including the browser extension) is the intellectual property of DEMVOL d.o.o. You may not reproduce, modify, or distribute our proprietary technology without express written permission.

You agree to indemnify and hold DEMVOL d.o.o. harmless from any claims, losses, or damages resulting from your violation of this Privacy Policy or misuse of our services.

11. CHANGES TO THIS POLICY

We reserve the right to update this Policy to reflect changes in our practices or legal obligations. We will notify you of any material changes by posting the new version on our website with a revised effective date.

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