

## 6. Data Protection.

### 6.1. Processing Details.

The details of processing are:

**a) Subject matter and duration** of the processing:

As stated in the DPA, the main object of the processing is the performance of the Services pursuant to the Subscription Agreement for the duration of said Agreement.

**b) The following categories of data subjects** are concerned as being processed through the offered Services:

<input checked="" type="checkbox"/> customer's employees and former employees	<input checked="" type="checkbox"/> Third party contacts entered in the solution by customer
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**c) The following categories of personal data** are being processed by Processor on behalf of Controller while offering the Services:

Please note that the On!Track solution contains various modules, hence not all the categories might be processed for each module usage.

Categories of personal data:	Data notably included in each category:	Applicable On!Track modules:
1. <input checked="" type="checkbox"/> Identity and preferences data	<i>Full name, Title, Gender, Salutation, Language</i>	<input checked="" type="checkbox"/> On!Track Ready <input checked="" type="checkbox"/> On!Track Asset Manager
2. <input checked="" type="checkbox"/> Location data	<i>GPS tracking of user's cellphone (only when activated by the user on its cellphone and permission to the app granted) Geolocation of the Nuron CDM and charger (only when Nuron is activated and linked to On!Track)</i>	<input checked="" type="checkbox"/> On!Track Asset Manager
3. <input checked="" type="checkbox"/> Contact data	<i>Professional Email and/or Phone number</i>	<input checked="" type="checkbox"/> On!Track Ready <input checked="" type="checkbox"/> On!Track Asset Manager
4. <input checked="" type="checkbox"/> Professional data	<i>Function or Job title, Assets' assignment, Certification, Assets' lifecycle &amp; usage data (when Nuron is activated and linked to On!Track)</i>	<input checked="" type="checkbox"/> On!Track Asset Manager
5. <input checked="" type="checkbox"/> Technical data	<i>Log files, IP addresses, Connection data, User IDs</i>	<input checked="" type="checkbox"/> On!Track Ready <input checked="" type="checkbox"/> On!Track Asset Manager
6. <input checked="" type="checkbox"/> Support data	<i>Any personal data from the categories above submitted by a user in a support ticket to Hilti or needed for Hilti to solve the case.</i>	<input checked="" type="checkbox"/> On!Track Ready <input checked="" type="checkbox"/> On!Track Asset Manager
7. <input checked="" type="checkbox"/> User-submitted data	<i>Free text fields, Photos or other files containing data not listed above, uploaded at the user discretion.</i>	<input checked="" type="checkbox"/> On!Track Ready <input checked="" type="checkbox"/> On!Track Asset Manager

**d) Special categories** of personal data:

The Services **are not intended to process special categories** of personal data. Customer shall refrain from submitting such special categories of personal data through the Services.

**e) Nature and purposes** of the processing:

Nature of processing activities on the data:	Coverage examples:
1. <input checked="" type="checkbox"/> Collection or Recording	<i>e.g., gathering or capturing from the data subjects but not from controller.</i>
2. <input checked="" type="checkbox"/> Maintenance	<i>e.g., modification, alteration, correction, verification, validation.</i>
3. <input checked="" type="checkbox"/> Storage or Hosting	
4. <input checked="" type="checkbox"/> Usage	<i>e.g., retrieval, extraction, consultation, print, scan, etc. to provide the Services.</i>
5. <input checked="" type="checkbox"/> Sharing	<i>e.g., disclosure or making available or publishing to someone else than the controller.</i>
6. <input checked="" type="checkbox"/> Organization	<i>e.g., structuration, adaptation, combination, including dashboards or analytics.</i>
7. <input checked="" type="checkbox"/> Erasure or Destruction	

Purposes of processing the data:	Coverage examples:	Nature of processing activities required:
1. <input checked="" type="checkbox"/> Providing of the Services pursuant to the Subscription Agreement.	<i>e.g., ensuring the enrolment of users including step-by-step walkthrough, preparing the On!Track dashboard etc.</i>	All the activities from 1 to 7 as described in the above table are conducted to accomplish the purposes 1 to 5 described on the left columns.
2. <input checked="" type="checkbox"/> Creating a unique Hilti identity.	<i>e.g. creating a unique identity for login and unique identification on the Services, for security reasons.</i>	
3. <input checked="" type="checkbox"/> Maintaining operations, ensuring data integrity and security.	<i>e.g., logging activity, analyzing access behavior to identify and prevent illegitimate accesses.</i>	
4. <input checked="" type="checkbox"/> Providing technical support services to the users.	<i>e.g., using a ticketing system or remote desktop software solution, answering to user requests</i>	
5. <input checked="" type="checkbox"/> Providing Services' updates and fixes.		

### 6.2. Subprocessors.

The Subprocessors engaged with the Service Provider are:

a) Subprocessors for all customers:

Subprocessor	Processing activities conducted on behalf or to support the Service Provider in achieving the purposes.	Categories of personal data provided to the subprocessor	Location of the processing activity
<b>Hilti Asia IT Services Sdn Bhd</b> Level 5, Brunsfield Oasis Tower 3, No.2 Jalan PJU 1A/7A, Oasis Square, 47301 Petaling Jaya, Malaysia (“Hilti Asia IT”)	Same as <b>Hilti Corporation</b>	Same as <b>Hilti Corporation</b>	outside EU/EEA
<b>Hilti Corporation</b> Feldkircherstrasse 100, 9494 Schaan, Liechtenstein (“Hilti Corporation”)	Purposes: 1 <input checked="" type="checkbox"/> Providing of the Services pursuant to the Subscription Agreement. 2 <input checked="" type="checkbox"/> Creating a unique Hilti identity. 3 <input checked="" type="checkbox"/> Maintaining operations, ensuring data integrity and security 4 <input checked="" type="checkbox"/> Providing technical support services to the users. 5 <input checked="" type="checkbox"/> Providing Services’ updates and fixes.	1 <input checked="" type="checkbox"/> Identity and preferences data 2 <input checked="" type="checkbox"/> Location data 3 <input checked="" type="checkbox"/> Contact data 4 <input checked="" type="checkbox"/> Professional data 5 <input checked="" type="checkbox"/> Technical data 6 <input checked="" type="checkbox"/> Support data	EU/EEA
<b>Amazon Web Services</b> Inc. P.O. Box 81226 Seattle, WA 98108-1226, USA	Purposes: 1 <input checked="" type="checkbox"/> Providing of the Services pursuant to the Subscription Agreement. 4 <input checked="" type="checkbox"/> Providing technical support services to the users.  This subprocessor is providing the central hosting solution and related support services.	Same as <b>Hilti Corporation</b>	EU/EEA ( <b>AWS Ireland</b> , Greenhills Road, Tymon North, Dublin, Ireland)
<b>Hilti Technology Solutions India Private Limited (HTSI)</b> 11th floor, Vikram Monarch CTS no. 1115.a/1 Ganeshkind, Shivaji nagar, 411016 Pune, India	Same as <b>Hilti Corporation, except:</b>  2 <input checked="" type="checkbox"/> Creating a unique Hilti identity.	Same as <b>Hilti Corporation</b>	outside EU/EEA
<b>Hilti Entwicklungsgesellschaft GmbH</b> Hiltistrasse 2, 86916 Kaufering, Germany	Same as <b>Hilti Corporation, except:</b>  2 <input checked="" type="checkbox"/> Creating a unique Hilti identity.	Same as <b>Hilti Corporation</b>	EU/EEA
<b>Hilti Befestigungstechnik AG</b> Grünaustrasse 1a, 9470 Buchs, Switzerland	Same as <b>Hilti Corporation</b>	Same as <b>Hilti Corporation</b>	outside EU/EEA but adequate country
<b>LogMeIn Ireland Limited</b> Bloodstone Building, Block C, Riverside IV, 70 Sir John Rogerson’s Quay, Dublin 2, Ireland	Purposes: 4 <input checked="" type="checkbox"/> Providing technical support services to the users.  This subprocessor provides a software solution for remote desktop software as well as related support services.	1 <input checked="" type="checkbox"/> Identity and preferences data 6 <input checked="" type="checkbox"/> Support data	EU/EEA
<b>ServiceNow BV</b> Hoekenrode 3, 1102 BR Amsterdam, Netherlands	Purposes: 4 <input checked="" type="checkbox"/> Providing technical support services to the users.  This subprocessor provides a ticketing system for support case tracking and related support services.	1 <input checked="" type="checkbox"/> Identity and preferences data 6 <input checked="" type="checkbox"/> Support data	EU/EEA
<b>GlobalLogic Worldwide Ltd</b> 1741 Technology Drive, Suite 400, San Jose, California 95110, USA	Same as <b>Hilti Corporation</b>	Same as <b>Hilti Corporation</b>	outside EU/EEA
<b>Atlassian</b> Level 6 341 George Street, Sydney, NSW 2000 Australia	Purposes: 4 <input checked="" type="checkbox"/> Providing technical support services to the users.  This subprocessor provides a ticketing system for support case tracking and related support services.	1 <input checked="" type="checkbox"/> Identity and preferences data 6 <input checked="" type="checkbox"/> Support data	outside EU/EEA

<p><b>Microsoft Azure Cloud Service: SQL Managed Instance, Western Europe</b></p>	<p>Purposes:  1 <input checked="" type="checkbox"/> Providing of the Services pursuant to the Subscription Agreement.  4 <input checked="" type="checkbox"/> Providing technical support services to the users.</p> <p>This subprocessor provides the storage system allowing for the On!Track dashboard and related support services.</p>	<p>4 <input checked="" type="checkbox"/> Professional data (only the Assets' assignment)</p>	<p>EU/EEA</p>
<p><b>Infoguard</b>  Lindenstrasse 10, 6340 Baar, Switzerland</p>	<p>Purposes:  3 <input checked="" type="checkbox"/> Maintaining operations, ensuring data integrity and security</p> <p>This subprocessor provides a software solution for analysing access behaviour to ensure legitimate accesses.</p>	<p>5 <input checked="" type="checkbox"/> Technical data</p>	<p>outside EU/EEA but adequate country</p>
<p><b>WalkMe</b>  AWS EU Frankfurt Region (EU-Central-1)</p>	<p>Purposes:  1 <input checked="" type="checkbox"/> Providing of the Services pursuant to the Subscription Agreement.  4 <input checked="" type="checkbox"/> Providing technical support services to the users.</p> <p>This subprocessor provides a walkthrough solution to explain the functionalities in the On!Track solution and related support services.</p>	<p>5 <input checked="" type="checkbox"/> Technical data (only IP addresses)</p>	<p>EU/EEA</p>
<p><b>SAP (Schweiz) AG</b>  Leugenstrasse 6, 2504 Biel, Switzerland</p>	<p>Purposes:  1 <input checked="" type="checkbox"/> Providing of the Services pursuant to the Subscription Agreement.  5 <input checked="" type="checkbox"/> Providing Services' updates and fixes.</p> <p>This subprocessor provides a cloud solution to enable notably the provision of code fixes and related support services.</p>	<p>5 <input checked="" type="checkbox"/> Technical data</p>	<p>EU/EEA (SAP tenant in AWS, EU Frankfurt Region (EU-Central-1))</p>
<p><b>Auth0</b>  10800 NE 8th St, Suite 700 Bellevue, WA 98004, USA</p>	<p>Purposes:  3 <input checked="" type="checkbox"/> Maintaining operations, ensuring data integrity and security</p> <p>This subprocessor provides a user storage, access management solution and related support services.</p>	<p>5 <input checked="" type="checkbox"/> Technical data</p>	<p>outside EU/EEA</p>
<p><b>Datadog Inc.</b>  286 Fifth Avenue, 12th Floor, New York, NY 10001, USA</p>	<p>Purposes:  3 <input checked="" type="checkbox"/> Maintaining operations, ensuring data integrity and security</p> <p>This subprocessor provides a logging aggregation, monitoring solution and related support services..</p>	<p>5 <input checked="" type="checkbox"/> Technical data (only log files)</p>	<p>outside EU/EEA</p>
<p><b>MobiusCode GmbH</b>  Berg-Am-Laim-Str. 64, 81673 Munich, Germany</p>	<p>Purposes:  4 <input checked="" type="checkbox"/> Providing technical support services to the users.</p> <p>This subprocessor provides an externalized development service and quality assurance of its development.</p>	<p>5 <input checked="" type="checkbox"/> Technical data (only log files)</p>	<p>EU/EEA</p>
<p><b>Nous Infosystems Private Ltd., #1, 1st Main, 1st Block, Koramangala 560034 Bangalore, India</b></p>	<p>Same as <b>Hilti Corporation</b></p>	<p>Same as <b>Hilti Corporation</b></p>	<p>outside EU/EEA</p>
<p><b>Auriga, Inc.</b>  400 TradeCenter, Ste 5900 Woburn, MA 01801, USA</p>	<p>1 <input checked="" type="checkbox"/> Providing of the Services pursuant to the Subscription Agreement.</p>	<p>Same as <b>Hilti Corporation</b></p>	<p>outside EU/EEA</p>
<p><b>Akamai Technologies GmbH</b>  Parkring 29, Garching, 85748 Germany</p>	<p>1 <input checked="" type="checkbox"/> Providing of the Services pursuant to the Subscription Agreement.  3 <input checked="" type="checkbox"/> Maintaining operations, ensuring data integrity and security</p>	<p>Same as <b>Hilti Corporation</b></p>	<p>outside EU/EEA</p>

b) Subprocessors for customers in the respective countries, for support purposes:

The below list of subprocessor relates solely to the purpose 4 ☒ Providing technical support services to the users. To ensure the support services, the support is split in several levels, the first level support is always the same country as the one of customer. The second level support is regrouped regionally, as according to the below Hub structure. Support services may have access to all data as required (from 1 to 7 as defined above).

Subprocessor	Concerned countries	Location of the processing activity
<b>Hilti Asia Ltd.</b> 701-704, 7/F, Tower A, Manulife Financial Centre, 223 Wai Yip Street, Kwun Tong, HK- Kowloon, Hong Kong	For customers domiciled in: Hong Kong, Australia, New Zealand, Japan, China, Korea, Taiwan, Singapore, Philippines, Malaysia, Thailand, Indonesia, Vietnam, India	outside EU/EEA
<b>Hilti CR spol. s r.o</b> Uhrinevska 734, P.O. Box 29, CR-25243 Prag-Pruhonice, Czech Republic	For customers domiciled in: Czech Republic, Slovakia, Hungary, Estonia, Latvia, Lithuania	EU/EEA
<b>Hilti Deutschland AG</b> Hiltistrasse 2, 86916 Kaufering, Germany	For customers domiciled in: Austria, Germany, Liechtenstein, Switzerland, Netherlands, Poland	EU/EEA
<b>Hilti Emirates L.L.C.</b> Dubai Investment Park, Dubai, United Arab Emirates	For customers domiciled in: United Arab Emirates, Qatar, Turkey, South Africa, Saudi Arabia, Bahrain, Kuwait, Oman, Morocco, Algeria	outside EU/EEA
<b>Hilti France SAS</b> 126 rue Gallieni, 92100 Boulogne Billancourt, France	For customers domiciled in: France, Monaco, Spain, Belgium, Luxembourg, Portugal	EU/EEA
<b>Hilti (Gt. Britain) Ltd.</b> 1 Trafford Wharf Road Trafford Park GB-M17 1BY Manchester, United-Kingdom	For customers domiciled in: Great Britain, Ireland, Sweden, Denmark, Finland, Norway	outside EU/EEA
<b>Hilti, Inc.</b> Hilti North America Corporate Headquarters, 7250 Dallas Parkway, Suite 1000, US-Plano, TX 74146, USA	For customers domiciled in: United States, Canada, Puerto Rico	outside EU/EEA
<b>Hilti Mexicana</b> S.A. De C.V., Avenida Jaime Balmes 8, Polanco, Polanco I Secc, 11510 Ciudad de México, CDMX, Mexico	For customers domiciled in: Mexico, Columbia, Chile, Argentina, Brazil	outside EU/EEA
<b>Hilti Distribution Ltd.</b> 141402 Moscow region, Khimki, Russia Leningradskaya st. 25 I Business center "Mebe One"   Floor 14	For customers domiciled in: Russia, Kazakhstan, Belarus, Ukraine	outside EU/EEA
<b>Hilti Italia S.p.A.</b> Piazza Montanelli 20 IT-20099 Sesto San Giovanni (Milano), Italy	For customers domiciled in: Italy, Vatican, San Mario, Romania, Bulgaria, Slovenia, Greece, Israel.	EU/EEA
<b>Softline</b> Derbenevskaya emb. 7, Building 8, Business Quarters "Novospassky", Moscow, Russia, 115114	For customers domiciled in: Russia.  This subprocessor provides the hosting solution for Russia.	outside EU/EEA

c) Subprocessors for customers using specific modules or functionalities:

**Heavy equipment and van inventory management**

Subprocessor	Processing activities conducted on behalf or to support the Service Provider in achieving the purposes.	Categories of personal data provided to the subprocessor	Location of the processing activity
<b>Trackunit ApS</b> Gasværksvej 24 4.sal, DK-9000 Aalborg, Denmark	Purposes: 1 <input checked="" type="checkbox"/> Providing of the Services pursuant to the Subscription Agreement. 3 <input checked="" type="checkbox"/> Maintaining operations, ensuring data integrity and security 4 <input checked="" type="checkbox"/> Providing technical support services to the users. 5 <input checked="" type="checkbox"/> Providing Services' updates and fixes.  This subprocessor provides a solution enabling the provision of the TU600 hardware related services.	Same as <b>Hilti Corporation</b>  Location data is provided by the TU600 hardware not user's cellphone	EU/EEA

**ON!Track Unite**

Subprocessor	Processing activities conducted on behalf or to support the Service Provider in achieving the purposes.	Categories of personal data provided to the subprocessor	Location of the processing activity
<b>Software AG</b> Uhlandstr. 12, 64297 Darmstadt, Germany	Purposes: 1 <input checked="" type="checkbox"/> Providing of the Services pursuant to the Subscription Agreement. 4 <input checked="" type="checkbox"/> Providing technical support services to the users.  This subprocessor provides an externalized development service and middleware platform for integrations and quality assurance of its development.	Same as <b>Hilti Corporation</b>	EU/EEA
<b>Intelligent Construction Tools</b> LLC 10368 Westmoor Drive Westminster, CO 80021, USA	Purposes: 1 <input checked="" type="checkbox"/> Providing of the Services pursuant to the Subscription Agreement. 4 <input checked="" type="checkbox"/> Providing technical support services to the users.  This subprocessor provides an externalized development service and middleware platform for integrations and quality assurance of its development.	Same as <b>Hilti Corporation</b>	outside EU/EEA