# EU Data Act Transparency Declaration

**Company Information (Data Controller)**

Spotter B.V.
Leeuwenhoekweg 20c
2661 CZ  Bergschenhoek
The Netherlands

Chamber of Commerce No.: 62825518
VAT No.: NL854972870B01

## 1. Purpose of This Declaration

This transparency declaration describes how data is generated, processed, stored, and made accessible by GPS tracking devices under the Spotter brand.

This declaration has been drawn up in accordance with the principles of the EU Data Act (Regulation (EU) 2023/2854) and aims to provide transparency regarding the use of device-generated data.

This declaration applies to all Spotter GPS trackers. Specific models and article numbers are listed in Annex A**.**

## 2. Roles and Responsibilities

Spotter B.V. is responsible for the collection, processing, and storage of data generated by the devices. The products are sold through distributors, including:

Fleetprofs GmbH
Rheinpromenade 9
46446 Emmerich am Rhein
Germany

Fleetprofs GmbH acts solely as a reseller and has no access to location data and no role in the processing thereof**.**

## 3. Description of Products and Service

Spotter GPS trackers use GPS technology to determine the geographical location of persons, animals, or objects, and transmit this data to the Spotter platform.

Users can access this data through a personal online account.

## 4. Categories of Data Generated

The devices generate exclusively:

- Geographical location data (GPS)
- Technical communication data necessary for operation

The only personal data processed are:

- The user's email address (for account access)

Location data may, under certain circumstances, qualify as personal data; however, within the Spotter platform it is not directly linked to identifiable user information.

## 5. Purpose of Data Processing

Data is used exclusively for:

- The operation of the service
- Displaying location information to the user

Data is not used for:

- Profiling
- Marketing
- Commercial exploitation

## 6. Data Storage

Data is stored within the European Union. The hosting infrastructure is located in **The Netherlands** and is managed by a professional hosting provider.

## 7. Retention Period

Location data is retained for a maximum of **7 days** and is thereafter automatically deleted.

## 8. Access to Data

Access to data is restricted to:

- The user
- Authorised personnel of Spotter B.V. (on request only)

## 9. Data Access and Portability (EU Data Act)

Users have the right to:

- Access the data generated by their device
- Request the transfer of data to a third party, to the extent technically feasible and legally required

Requests may be submitted through the customer service team. Spotter B.V. will handle such requests in accordance with applicable legislation.

## 10. Sharing of Data with Third Parties at the User's Request

Spotter B.V. does not share data with third parties, unless:

- this is necessary for the performance of the service, or
- the user explicitly requests this
- upon order of a public prosecutor

In the event of a valid request from the user, data may be shared with a third party designated by the user, provided this is technically feasible and complies with legal requirements.

## 11. No Commercial Data Sharing

Data is not sold or commercially shared with third parties.

## 12. User Rights

Users may:

- Access their data
- Submit a request for the deletion of account data

Location data is automatically deleted after 7 days.

## 13. Security Measures

Spotter B.V. applies appropriate technical and organisational measures to protect data against:

- unauthorised access
- loss
- misuse

## 14. Additional Processing of Personal Data (GDPR)

In addition to the device data described in this declaration, Spotter B.V. also processes personal data as described in the privacy policy.

Such data may include:

- Name and contact details
- Email address
- IP address

- Account data
- Billing data
- Website usage and analytics data

These data are collected in the context of:

- The use of the website
- The creation of accounts
- Customer service and support
- Renewal of services

These personal data are processed on the basis of:

- Consent of the user
- Performance of a contract
- Legal obligations
- Legitimate interest

These data are not linked to the location data generated by the devices. For full information, please refer to the privacy policy of Spotter B.V.

## 15. Use of Third-Party Service Providers and Analytics

Spotter B.V. makes use of third-party service providers for, amongst other things:

- Hosting and cloud infrastructure
- Software services
- Payment processing
- Website analytics (such as Google Analytics)

In the context of website use, anonymised data—such as IP addresses and click behaviour—may be processed for statistical and optimisation purposes.

For analytics services, data may be processed outside the European Union, for example by Google. Such processing takes place in accordance with applicable legislation and appropriate safeguards.

These processing activities are separate from the device data described in this transparency declaration.

## 16. Disclosure to Authorities

Spotter B.V. may disclose personal data or other data to competent authorities where:

- this is required by law, or
- this is necessary in the context of legal proceedings or disputes

Such disclosure shall take place solely in accordance with applicable legislation.

## 17. Declaration

Spotter B.V. declares that data processing is carried out transparently and is directed exclusively towards the functionality of the service, in accordance with applicable European legislation.

**Date of Declaration:**
15 October 2026

**Document Version:** 1.1

**Signed on behalf of Spotter B.V.**

W. Hofman



CCO
Spotter B.V.

# Annex A – List of Products / Article Numbers

This annex contains the GPS products under the Spotter brand that are covered by the EU Data Act Transparency Declaration.

| Article No. | Product Name | Type |
|---|---|---|
| SP-HEXB | Spotter GPS Watch Explorer - Blue (4G) | GPS watch |
| SP-HEXBK | Spotter GPS Watch Explorer - Black (4G) | GPS watch |
| SP-HEXG | Spotter GPS Watch Explorer - Green (4G) | GPS watch |
| SP-HEXP | Spotter GPS Watch Explorer - Pink (4G) | GPS watch |
| SP-HSW | Spotter Senior GPS Watch (4G) | GPS watch |
| SP-H2302A | Animal Spotter | GPS tracker |
| SPW-BL1701B | Spotter GPS Watch - Blue (2G) | GPS watch |
| SPW-PI1701B | Spotter GPS Watch - Pink (2G) | GPS watch |
| SP-X10 | Spotter X10 - GPS tracker (4G) | GPS tracker |
| PS-C1802 | Pet Spotter - Cat | GPS tracker |
| SP-HCX | Spotter CatX (4G) | GPS tracker |

**Notes:**

- Additional products may be added to the same table.
- All products in this list are covered by the EU Data Act Transparency Declaration issued by Spotter B.V.