

Privacy Notice CooCoo

Prisma-IT Privacy Notice

(CooCoo, DelayManager)

1. Controller and contact details

The controller responsible for processing your personal data is:

Prisma-IT B.V.

beursplein 11

3011AA, Rotterdam, Netherlands

Email: support@prisma-it.com

Telephone: +31 10 800 9444

If you have any questions about this privacy notice or how we handle your personal data, you can contact us using the details above.

2. Scope of this privacy notice

This privacy notice explains how Prisma-IT processes personal data of users of the following products and services:

- **CooCoo**
- **DelayManager**

This notice covers the personal data Prisma-IT needs to create and manage **user accounts** in these products (for example: name, username, email address, optional phone number).

Processing of other data (such as content entered into the products on behalf of Prisma-IT customers) is usually governed by separate agreements with those customers, where Prisma-IT typically acts as a **processor** and the customer acts as **controller**.

3. Personal data we process and why

3.1 CooCoo

Categories of personal data

For CooCoo user accounts we may process:

- **Username** – may contain first and last name
- **Name** (where provided separately)
- **Email address** (required, must be valid)
- **Phone number** (optional)
- **Technical and log data** (e.g. IP address, browser type, date and time of access, actions performed in the system) – for security and troubleshooting

Purposes and legal basis

Purpose	Data used	Legal basis (Art. 6 GDPR)
Create and manage your CooCoo user account	Username, name, email address, phone (opt.)	Performance of a contract (Art. 6(1)(b))
Identify you in the system (e.g. audit logs)	Username, name	Performance of a contract (Art. 6(1)(b)) and legitimate interest (Art. 6(1)(f)) in traceability and security
Password resets and account recovery	Email address	Performance of a contract (Art. 6(1)(b))
Contact you about technical issues or support	Email address, phone number (if provided)	Legitimate interest (Art. 6(1)(f)) in providing support
Security monitoring and prevention of abuse	Technical/log data (incl. IP address)	Legitimate interest (Art. 6(1)(f)) in securing our services

Providing a **valid email address** is required to create and maintain your account (for identification and password reset).

Providing a **phone number** is **optional** and used only when needed for support or important notifications.

3.2 DelayManager

Categories of personal data

For DelayManager user accounts we may process:

- **Username** – may contain first and last name
- **Name** (where provided)
- **Email address** (required, must be valid)

- **Phone number** (optional)
- **Technical and log data** (e.g. IP address, system actions, timestamps) – for security, audit trail and troubleshooting

Purposes and legal basis

Purpose	Data used	Legal basis (Art. 6 GDPR)
Create and manage your DelayManager user account	Username, name, email address, phone (opt.)	Performance of a contract (Art. 6(1)(b))
Identify you as a user for operational processes	Username, name	Performance of a contract (Art. 6(1)(b)) and legitimate interest (Art. 6(1)(f))
Password resets and account recovery	Email address	Performance of a contract (Art. 6(1)(b))
Contact you about incidents or updates	Email address, phone number (if provided)	Legitimate interest (Art. 6(1)(f))
Security monitoring and incident investigation	Technical/log data	Legitimate interest (Art. 6(1)(f))

3.3 Customer content and other data where we act as processor

In both products (CooCoo, DelayManager), our **customers** may input or upload additional data (for example, information about their end-users, passengers, employees, etc.).

For this type of data:

- The **customer** usually acts as the **controller**.
- Prisma-IT acts as a **processor**, processing the data only on the customer's instructions and according to the applicable data processing agreement.

In such cases, the customer is responsible for providing an appropriate privacy notice to the data subjects whose data is processed in the products.

4. Recipients of personal data

We may share your personal data with:

- **Internal recipients:** authorised Prisma-IT staff who need access to perform their tasks (e.g. support, development, operations, finance).
- **Service providers (processors)** who help us deliver our services, such as:
 - Hosting and infrastructure providers
 - Monitoring and logging services
 - Email and ticketing systems

These service providers process personal data only on our instructions and are bound by data processing agreements in accordance with Article 28 GDPR.

If we are required by law or a competent authority, we may also have to disclose personal data to public authorities.

5. International data transfers

If personal data is transferred to countries outside the European Economic Area (EEA), we ensure an adequate level of protection, for example by:

- An adequacy decision of the European Commission, and/or
- Standard Contractual Clauses (SCCs) approved by the European Commission, possibly combined with additional safeguards.

You can contact us using the details in section 1 if you would like more information about these safeguards.

6. Retention periods

We retain personal data only for as long as necessary for the purposes described in this notice or as required by law.

In general:

- **Account data** (name, username, email, phone number) is retained **for as long as your account is active**, and then for a limited period afterwards to:
 - resolve outstanding issues,
 - maintain security logs, and
 - comply with legal or contractual obligations.

After that, the data is deleted or irreversibly anonymised.

- **Technical and log data** is retained for a shorter period, mainly for security, troubleshooting and auditing, in line with our internal **Information Classification and Retention** policies.

More detailed retention periods are defined in Prisma-IT's internal **Information Classification Matrix** and **Information Classification** documentation.

7. Source of personal data

We primarily receive your personal data directly from you or from your organisation (for example, when an administrator at your organisation creates an account for you).

Technical and log data is generated automatically by our systems when you use our products.

8. Your rights

Under the GDPR, you have the following rights in relation to your personal data:

- **Right of access** – to obtain confirmation whether we process your data and to receive a copy.
- **Right to rectification** – to have inaccurate or incomplete data corrected.
- **Right to erasure** – to request deletion of your personal data in specific situations.
- **Right to restriction of processing** – to limit processing in certain cases.
- **Right to data portability** – to receive personal data you have provided to us in a structured, commonly used and machine-readable format, and to transmit it to another controller (where processing is based on consent or contract and carried out by automated means).
- **Right to object** – to processing based on our legitimate interests, and to object at any time to processing for direct marketing.
- **Right to withdraw consent** – where processing is based on consent, you can withdraw your consent at any time. This does not affect the lawfulness of processing before withdrawal.

You can exercise these rights by contacting us using the contact details in section 1.

You also have the right to lodge a complaint with your local supervisory authority.

9. Obligation to provide data

For the products covered in this notice:

- Providing a **valid email address** and **username** (which may include your name) is **necessary** to create and manage your user account and to enable password reset and security features.
- If you do not provide this information, we cannot create or maintain your account, and you may not be able to use the services.
- Providing a **phone number** is **optional**, This is only used by your organization Prisma-it doesn't use this to contact the users

10. Automated decision-making

We do **not** use your personal data for automated decision-making, including profiling, that produces legal effects concerning you or similarly significantly affects you (Article 22 GDPR).

If this changes in the future, we will update this notice and provide you with additional information about the logic involved and the possible consequences for you.