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:

☒ customer`s employees and former employees	☒ Third party contacts entered in the solution by customer

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. ☒ Identity and preferences data	*Full name, Title, Gender, Salutation, Language*	☒ On!Track Ready ☒ On!Track Lite/Pro/Enterprise
2. ☒ Location data	*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)	☒ On!Track Ready ☒ On!Track Lite/Pro/Enterprise
3. ☒ Contact data	*Professional Email and/or Phone number*	☒ On!Track Ready ☒ On!Track Lite/Pro/Enterprise
4. ☒ Professional data	*Function or Job title, Assets' assignment, Certification, Assets' lifecycle & usage data* (when Nuron is activated and linked to On!Track)	☒ On!Track Lite/Pro/Enterprise
5. ☒ Technical data	*Log files, IP addresses, Connection data, User IDs*	☒ On!Track Ready ☒ On!Track Lite/Pro/Enterprise
6. ☒ Support data	*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.*	☒ On!Track Ready ☒ On!Track Lite/Pro/Enterprise
7. ☒ User-submitted data	*Free text fields, Photos or other files containing data not listed above, uploaded at the user discretion.*	☒ On!Track Ready ☒ On!Track Lite/Pro/Enterprise

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. ☒ Collection or Recording	*e.g., gathering or capturing from the data subjects but not from controller.*
2. ☒ Maintenance	*e.g., modification, alteration, correction, verification, validation.*
3. ☒ Storage or Hosting	
4. ☒ Usage	*e.g., retrieval, extraction, consultation, print, scan, etc. to provide the Services.*
5. ☒ Sharing	*e.g., disclosure or making available or publishing to someone else than the controller.*
6. ☒ Organization	*e.g., structuration, adaptation, combination, including dashboards or analytics.*
7. ☒ Erasure or Destruction	

Purposes of processing the data:	Coverage examples:	Nature of processing activities required:
1. ☒ Providing of the Services pursuant to the Subscription Agreement.	*e.g., ensuring the enrolment of users including step-by-step walkthrough, preparing the On!Track dashboard etc.*	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. ☒ Creating a unique Hilti identity.	*e.g. creating a unique identity for login and unique identification on the Services, for security reasons.*	
3. ☒ Maintaining operations, ensuring data integrity and security.	*e.g., logging activity, analyzing access behavior to identify and prevent illegitimate accesses.*	
4. ☒ Providing technical support services to the users.	*e.g., using a ticketing system or remote desktop software solution, answering to user requests*	
5. ☒ Providing Services' updates and fixes.		

6.2. Subprocessors.
The Subprocessors engaged with the Service Provider are:

a) Subprocessors for all customers:

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

	Purposes:		
Microsoft Azure Cloud Service: SQL Managed Instance, Western Europe	1 ☒ Providing of the Services pursuant to the Subscription Agreement. 4 ☒ Providing technical support services to the users. This subprocessor provides the storage system allowing for the On!Track dashboard and related support services.	4 ☒ Professional data (only the Assets' assignment)	EU/EEA
Infoguard Lindenstrasse 10, 6340 Baar, Switzerland	Purposes: 3 ☒ Maintaining operations, ensuring data integrity and security This subprocessor provides a software solution for analyzing access behavior to ensure legitimate accesses.	5 ☒ Technical data	outside EU/EEA but adequate country
WalkMe AWS EU Frankfurt Region (EU-Central-1)	Purposes: 1 ☒ Providing of the Services pursuant to the Subscription Agreement. 4 ☒ Providing technical support services to the users. This subprocessor provides a walkthrough solution to explain the functionalities in the On!Track solution and related support services.	5 ☒ Technical data (only IP addresses)	EU/EEA
Auth0 10800 NE 8th St, Suite 700 Bellevue, WA 98004, USA	Purposes: 3 ☒ Maintaining operations, ensuring data integrity and security This subprocessor provides a user storage, access management solution and related support services.	5 ☒ Technical data	outside EU/EEA
Datadog Inc. Dublin 13-18 City Quay 1st Floor, D02 ED70 Ireland	Purposes: 3 ☒ Maintaining operations, ensuring data integrity and security This subprocessor provides a logging aggregation, monitoring solution and related support services.	5 ☒ Technical data (only log files)	inside EU/EEA
MobiusCode GmbH Berg-Am-Laim-Str. 64, 81673 Munich, Germany	Purposes: 4 ☒ Providing technical support services to the users. This subprocessor provides an externalized development service and quality assurance of its development.	5 ☒ Technical data (only log files)	EU/EEA
Nous lnfosystems Private Ltd., #1, 1st Main, 1st Block, Koramangala 560034 Bangalore, India	Same as **Hilti Corporation**	Same as **Hilti Corporation**	outside EU/EEA
Akamai Technologies GmbH Parkring 29, Garching, 85748 Germany	1 ☒ Providing of the Services pursuant to the Subscription Agreement. 3 ☒ Maintaining operations, ensuring data integrity and security	Same as **Hilti Corporation**	outside EU/EEA

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).

Subproccesor	Concerned countries	Location of the processing activity
Hilti Asia Ltd. 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
Hilti CR spol. s r.o V Parku 2325/16, Chodov, 148 00 Praha 11, Czech Republic	For customers domiciled in: Czech Republic, Slovakia, Hungary, Estonia, Latvia, Lithuania, Ukraine	EU/EEA
Hilti Deutschland AG Hiltistrasse 2, 86916 Kaufering, Germany	For customers domiciled in: Austria, Germany, Liechtenstein, Switzerland, Netherlands, Poland	EU/EEA
Hilti Emirates L.L.C. 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, Russia, Kazakhstan, Belarus	outside EU/EEA
Hilti France SAS 126 rue Gallieni, 92100 Boulogne Billancourt, France	For customers domiciled in: France, Monaco, Spain, Belgium, Luxembourg, Portugal	EU/EEA
Hilti (Gt. Britain) Ltd. 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
Hilti, Inc. 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
Hilti Mexicana 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
Hilti Italia S.p.A. 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

c) Subprocessors for customers using specific modules or functionalities:

Heavy equipment and van inventory management

Subproccesor	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
Trackunit ApS Gasværksvej 24 4.sal, DK-9000 Aalborg, Denmark	Purposes: 1 ⊠ Providing of the Services pursuant to the Subscription Agreement. 3 ⊠ Maintaining operations, ensuring data integrity and security 4 ⊠ Providing technical support services to the users. 5 ⊠ Providing Services' updates and fixes. This subprocessor provides a solution enabling the provision of the TU600 hardware related services.	Same as **Hilti Corporation** Location data is provided by the TU600 hardware not user's cellphone.	EU/EEA

ON!Track Unite

Subproccesor	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
Software AG Uhlandstr. 12, 64297 Darmstadt, Germany	Purposes: 1 ⊠ Providing of the Services pursuant to the Subscription Agreement. 4 ⊠ 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 **Hilti Corporation**	EU/EEA
Intelligent Construction Tools LLC 10368 Westmoor Drive Westminster, CO 80021, USA	Purposes: 1 ⊠ Providing of the Services pursuant to the Subscription Agreement. 4 ⊠ 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 **Hilti Corporation**	outside EU/EEA