5. Data Protection.

5.1. Processing Details. The details of processing are:

a) **Subject matter** and **duration** of the processing: As stated in the DPA (Data Processing Agreement), 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 being processed while offering the 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:

Categories of personal data:	*Data notably included in each category:*
1. ☒ Identity and preferences data	*Full name, Language*
2. ☒ Location data logging	*Time zone data based on Time zone setting. Location data if* activated in the software settings by a System Administrator *and if user consent is given*
3. ☒ Contact data	*Professional Email and/or Phone number*
4. ☒ Professional data	*Function or Job title, Company, Employee ID, work schedule, work attendance and absences records*
5. ☒ Technical data	*Log files, IP addresses, Connection data, User IDs*
6. ☒ Support data	*Any personal data from the categories above submitted by a user in a support ticket to Service Provider or needed for Service Provider to solve the case*
7. ☒ User-submitted data	*Free text fields, which may include personal data not listed above, added at the user discretion in the comments filed*

d) Special categories of personal data

The Services **are not intended to process special categories** of personal data. Customer shall refrain from submitting/processing 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 timesheet etc.*	All the activities from 1 to 7 as described in the above table are conducted to accomplish the purposes 1 to 5 described in 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 user requests.*	
5. ☒ Providing Services' updates and fixes		

5.2. **Subprocessors.** The Subprocessors engaged with the Service Provider are:

a) 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
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 logging, not tracking 3 ☒ Contact data 4 ☒ Professional data 5 ☒ Technical data 6 ☒ Support data 7 ☒ User-submitted data	EU/EEA
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
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. 5 ☒ Providing Services' updates and fixes. This subprocessor provides the central hosting solution and various AWS managed services.	Same as **Hilti Corporation**	EU/EEA (**AWS Ireland,** Greenhills Road, Tymon North, Dublin, Ireland, Backup: Frankfurt, Germany)
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 Heldaustrasse 70, 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
ZenDesk 181 Fremont St., San Francisco, CA 94105, USA	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

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
GlobalLogic Worldwide Ltd 1741 Technology Drive, Suite 400, San Jose, California 95110, USA	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 human resources to support development, operational and central customer support activities related to ON!Track.	Same as **Hilti Corporation**	outside EU/EEA
Xoriant 7th Floor,Office 7A & B, C Wing, Time Square Builing Mittal Estate, Marol Naka, Andheri Kurla Road, Anderi East, Mumbai - 400059, Maharashtra, India	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 human resources to support development, operational and central customer support activities related to ON!Track.	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
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
Auth0 10800 NE 8th St, Suite 700 Bellevue, WA 98004, USA	Purposes: 2 ☒ Creating a unique Hilti identity. 3 ☒ Maintaining operations, ensuring data integrity and security. This subprocessor provides an access management solution and related support services.	5 ☒ Technical data	outside EU/EEA
Datadog Inc. 286 Fifth Avenue, 12th Floor, New York, NY 10001, USA	Purposes: 3 ☒ Maintaining operations, ensuring data integrity and security. This subprocessor provides logging aggregation, a monitoring solution and related support services.	5 ☒ Technical data (only log files)	outside 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 Infosystems Private Ltd., #1, 1st Main, 1st Block, Koramangala 560034 Bengaluru, India	Same as **Hilti Corporation**	Same as **Hilti Corporation**	outside EU/EEA

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
Oxford Global Resources Limited. Penrose Wharf-Penrose Quay Cork - Ireland	Same as **Hilti Corporation**	Same as **Hilti Corporation**	EU/EEA
Akamai Technologies GmbH Parkring 29, Garching 85748, Germany	Purposes: 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) Sub-processors only for customers in the respective countries, for support purposes:

The below list of sub-processors 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 Hub structure below. Support services may have access to all data as required (from 1 to 7 as defined above).

Sub-processor	Concerned countries	Location of the processing activity
Hilti ČR 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, Poland.	EU/EEA
Hilti Deutschland AG Hiltistrasse 2, 86916 Kaufering, Germany	For customers domiciled in: Austria, Germany, Liechtenstein, Switzerland, Netherlands .	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 Italia S.p.A. Piazza Montanelli 20 IT-20099 Sesto San Giovanni (Milano), Italy	For customers domiciled in: Italy, Vatican, San Marino, Romania, Bulgaria, Slovenia, Greece, Israel, Albania, Bosnia-Herzegovina, Croatia, Montenegro, Serbia	EU/EEA
Hilti, Inc. Hilti North America Corporate Headquarters, 7250 Dallas Parkway, Suite 1000, Plano, TX 75024, United States	For customers domiciled in: United States, Canada, Puerto Rico	outside 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