

## Update Notice

We have updated our Privacy Statement as of 1<sup>st</sup> December 2020.

Privacy Statement changes in version 2.0:

- Added new categories of personal data processed in our Weather API, Marine API and telephone call recordings
- Added language with respect to the transfer of data within the DTN companies via our Intragroup Personal Data Transfer Agreement including standard contractual clauses.
- Added language with respect to California Residents (California Consumer Privacy Act – CCPA) in section 18
- Added new categories of recipients (People Soft, Analytics tools, Replicon, Salesforce Service Cloud)
- Added changes in our entities
- Added language regarding EU/US Privacy Shield (invalid as of 16<sup>th</sup> of July 2020)

Thank you for visiting our website, and we are happy to continue helping you manage and protect your identity. If you have any questions, please contact [privacy@dtn.com](mailto:privacy@dtn.com)

# External Privacy Statement DTN

Version 2

**DTN**<sup>o</sup>



## EXTERNAL PRIVACY STATEMENT DTN

Effective April 1, 2020

### 1 Introduction

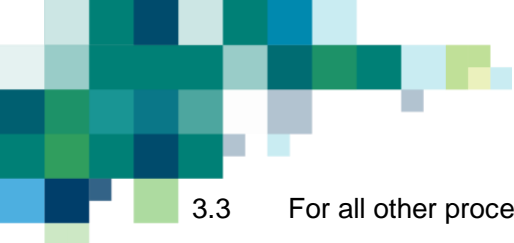
- 1.1 This Privacy Policy (“**Policy**”) is published and used by DTN, LLC and the affiliates of DTN, LLC, such as but not limited to the MeteoGroup group of companies (referred to as “**DTN**”, “**we**” or “**us**”). It applies to all our websites, including dtn.com, meteogroup.com, dtnpf.com, mydtn.com, and all other DTN related websites, which we refer to as “**Sites**”. The Policy also applies to all our services, such as all downloadable software, mobile applications, and other services provided by the DTN companies and on which a link to this Policy is displayed are referred, which refer to as “**Services**” in this Policy. More information on the DTN companies can be found in the below paragraph on ‘Data controllers’.
- 1.2 We respect privacy and value the confidence of our customers, employees, business partners, and others. We strive to collect, process, and disclose personal information in a manner consistent with the laws of the countries in which we do business and have a tradition of upholding the highest ethical standards in our business practices. We comply with the applicable laws and legislations, such as but not limited to the General Data Protection Regulation (“**GDPR**”).
- 1.3 We work with the following definition of “**Personal Data**”: all information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- 1.4 This Policy applies to the processing of Personal Data in connection to all business-to-business and consumer activities of DTN.
- 1.5 This Policy describes the personal data that we collect on or through our Services, how we process and disclose such information during and after our relationship with us, the steps we take to protect your Personal Data, and the rights you may have related to our Personal Data collection and use practices. By visiting the Sites, or by purchasing or using our Services, you accept the privacy practices described in this Policy.
- 1.6 This Policy is incorporated into, and is subject to, the DTN terms of use at [www.dtn.com/tos](http://www.dtn.com/tos).

### 2 DTN

- 2.1 DTN consists of a group of companies that provide the Sites and Services. The group consists of multiple legal entities which all ultimately all fall under TBG Holdings (DTN) B.V. (“**DTN Companies**”).

### 3 Data controller

- 3.1 A ‘data controller’ is understood to be the entity that determines the purposes and means of processing Personal Data. This definition is derived from the GDPR.
- 3.2 For the processing of Personal Data in the context of the activities of an establishment of DTN within the European Union, the data controller is MeteoGroup Nederland B.V.

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- 3.3 For all other processing of Personal Data, the data controller is DTN LLC.
  - 3.4 Should you have any questions on this, please contact us via the details in this Policy.

#### **4 Data Protection Officer**

- 4.1 DTN has appointed a contact person to direct your questions on privacy or the rights you may have to:

MeteoGroup Nederland B.V.  
Att. Sylvia van Zijderveld  
P.O. Box 24092,  
3502 MB Utrecht<sup>SEP</sup>

- 4.2 Or email [privacy@dtn.com](mailto:privacy@dtn.com). Please note that the Legal Department also receives a copy via this email address. We aim to respond within 30 days from the date we receive privacy-related communications.
- 4.3 For the DTN Companies established within the European Union, this contact person is formally appointed as “**Data Protection Officer**”.


#### **5 How and What Personal Data and information we process**

- 5.1 We may process, store and use the following categories of Personal Data about you where such is necessary:

- 5.1.1 Name;
- 5.1.2 Company details (registered name, address, registration number, etc.);
- 5.1.3 Telephone number;
- 5.1.4 E-mail address;
- 5.1.5 Banking details;
- 5.1.6 IP addresses, user/client ID’s and secrets;
- 5.1.7 CCTV camera images and voice recordings;
- 5.1.8 Photographs or videos;
- 5.1.9 All further Personal Data that might be necessary to adhere to this Policy;
- 5.1.10 All further Personal Data you choose to provide to us and for which we have determined the purposes and means.


- 5.2 Personal Data and further information is collected via the following sources.

- 5.3 **User-Provided Information.** We collect Personal Data voluntarily provided by users or visitors of our Services (also referred to as “**Users**” or “**you**” in this Policy), including when you visit the Sites, use the Services, register an account, fill out forms on the Sites, when you provide us with your business card, when you subscribe to our newsletters, register for trainings or



seminars, attend meetings or events we organise or visit our offices. We may also collect Personal Data from you when we are establishing a business relationship, performing professional weather services or you otherwise contact us. The Personal Data that we collect on or through our Services may include:

- 5.3.1 your first and last name;
  - 5.3.2 email address and mailing address;
  - 5.3.3 telephone number(s);
  - 5.3.4 organizational affiliation and further company details;
  - 5.3.5 billing / financial information;
  - 5.3.6 and any other information you choose to provide when you use the Services or otherwise interact with us.
- 5.4 **Location Information.** Some of our API's, Sites and mobile apps also collect geo-location information. We use your location information to provide requested location-specific services, including local weather forecasts and asset tracking. You may at any time opt-out from further allowing us to have access to your location data by turning off the location services in your mobile phone or browser settings. Please be aware that certain features of the mobile apps will not perform as expected if location services are turned off.
- 5.5 **Public sources.** Personal Data may be obtained from public registers (such as the Companies House or the Chamber of Commerce), news articles and internet searches.
- 5.6 **Social and professional networking.** If you register or login to our Websites or Services using social media (.e.g. LinkedIn Twitter or Google) to authenticate your identity and connect your social media login information with us, we will collect Personal Data or content needed for the registration or login that you permitted your social media provider to share with us. Such Personal Data and content may include your name and e-mail address and depending on your privacy settings, additional details about you. Please review the privacy controls on the applicable social media service to set which Personal Data you want to share with us. For further details please be referred to the [DTN Cookie statement](#).
- 5.7 **Automatically Collected Information.** As is true of most websites and mobile applications, we or our third party service providers and partners (discussed below) collect information from you over time using automated means such as cookies, beacons, or online data analytics tools. We also automatically collect Personal Data via our security systems. This “**automatically collected**” information may include:
- 5.7.1 CCTV camera images, photographs, voice recordings and video;
  - 5.7.2 internet protocol (IP) addresses;
  - 5.7.3 MAC addresses;
  - 5.7.4 device IDs, device and browser type(s);
  - 5.7.5 referring/exit pages;

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- 5.7.6 operating system, date/time stamp, or clickstream data;
- 5.7.7 and other information about the way you use the Services.
- 5.8 For the automatically collected Personal Data via cookies and similar techniques, please be referred to the [DTN Cookie statement](#).
- 5.9 Depending on the jurisdiction in which you reside and the laws and legislations applicable to your situation, this automatically collected information may or may not be considered Personal Data. We also use these technologies to collect information regarding your interaction with DTN-related links appearing on third-party websites or in a DTN-generated email, such as whether you click on or forward a link or message. We may link this automatically collected data to other information you provide or we collect from you. We also may include Personal Data in our customer relationship management records to better understand and serve you.
- 5.10 **Do Not Track.** DTN does not directly track you when you visit other websites or engage in other activities online, so we do not register Do Not Track (DNT) signals from your browser. However, you should review the privacy policies of other third parties that may be operating on our Sites (discussed below) to determine whether they honour DNT signals. For more information on “do not track” options, please see: <http://donottrack.us/>.
- 5.11 **Analytics.** We automatically collect Personal Data to make use of analytics tools such as Google Analytics and Eloqua to analyse trends, administer and improve our Services, and track Users’ movements around the Services and on the Internet, and to gather demographic information about our user base as a whole. These third party analytics companies do not seek to identify individual users or to receive personally identifiable information except as may occur when they use your IP address. This information helps us to improve our Services and deliver a better and more personalized service. Many of these companies, such as Google Analytics, collect and use information under their own privacy policies, which we encourage you to review. For more information about Google Analytics or Eloqua analytics and their privacy policies, please visit the Google Analytics privacy page and/or the Google Partners’ Page and the Eloqua privacy page. You may opt-out of Google Analytics or Eloqua web monitoring by following the instructions on the Google Analytics Web Monitoring Opt-Out page or the Eloqua Web Monitoring Opt-Out page. For further details please be referred to the [DTN Cookie statement](#).
- 5.12 **Clients.** DTN may enter into an agreement with a customer that engages us to perform professional weather services. When performing these activities, these customers may share Personal Data with DTN for which these customers are data controllers.
- 5.13 DTN has taken great care in setting out which Personal Data is processed by us. It may however be necessary for us to process additional Personal Data. When such happens, DTN will adhere to the safeguards as set out in this Statement.
- 5.14 If you fail to provide mandatory Personal Data when requested, we may not be able to perform the contract we have entered into with you or the company you work for, or we may be prevented from complying with our legal obligations. Certain information is necessary to enter into an agreement with us and if not provided, we may not be able to enter into such agreement with you.





## 6 Special categories of Personal Data

- 6.1 Save for some specific circumstances, we do not intend to collect, store and use special categories of Personal Data, which is a definition that is derived from the GDPR.
- 6.2 When we do need to process such Personal Data, we may request your consent to do so. Examples of special categories of Personal Data we may obtain are dietary restrictions or physical health access requirements e.g. when registering for events or trainings.

## 7 E-mail

- 7.1 If you receive commercial emails from us, you may unsubscribe at any time by following the instructions contained within the email or by sending an email to the address provided in the “Contact Us” section below. Please be aware that if you opt-out of receiving commercial email from us, it may take up to ten (10) business days for us to process your request. Additionally, even after you opt-out from receiving commercial messages from us, you will continue to receive otherwise permitted administrative messages from us regarding the Services.

## 8 Financial partners

- 8.1 At times DTN may allow a customer to purchase or lease products or equipment and/or to make payments through the Services. In such event, DTN may use a third-party shipping company, such as UPS or FedEx, to fulfil customer orders through the Sites, and may also use a credit card processing company to bill you for goods or services that you request. The current credit card processing company that DTN uses is called CyberSource®, and more information about this company can be found at: [www.cybersource.com](http://www.cybersource.com). DTN takes all reasonable measures to select third-party agents for fulfilment and financial processing that agree to not retain, share, store, or use your personal or financial information for any other purposes than fulfilling orders or enforcing customer agreements.

## 9 Advertising

- 9.1 We may also partner with a third party, including our current partner AdRoll, to display advertising on our Services and/or to manage our advertising on other websites and platforms. For further details please be referred to the [DTN Cookie statement](#).

## 10 How We Use Personal Data – purposes of processing

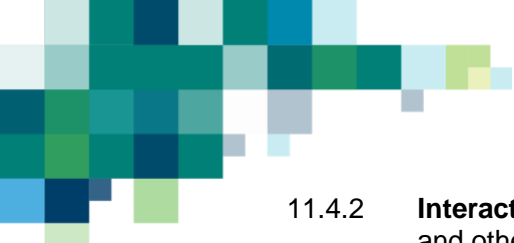
- 10.1 DTN processes Personal Data for the following purposes:
  - 10.1.1 As is necessary for the performance of contracts we have with you, or at your request prior to you entering into a contract with us (e.g., to send you product or billing information);
  - 10.1.2 Allowing DTN to provide, promote and improve products and services;
  - 10.1.3 To solicit, service and communicate with you;
  - 10.1.4 Organizing events for prospects and customers;
  - 10.1.5 Providing prospects and customers access to our products and services (including by means of verification of your identity and login data);



- 10.1.6 Allowing DTN to manage our business operations and complying with internal procedures and policies (for example, monitoring of compliance to rules, procedures and policies such as e.g. internal and external audits or investigations);
  - 10.1.7 Allowing DTN to purchase products and services and communicate with the (representatives of the) companies that supply such (for example, (personally owned) weather stations);
  - 10.1.8 Allowing DTN to support suppliers (for example, owners of weather stations);
  - 10.1.9 Allowing DTN to secure its property (for example, by conducting CCTV for security reasons for the various DTN offices);
  - 10.1.10 Participation in DTN's marketing initiatives or branding activities;
  - 10.1.11 Allow DTN to show advertisements;
  - 10.1.12 To comply with our legal obligations.
- 10.2 DTN does not use Personal Data to make solely automated decisions about you or to make decisions about you that are likely to procedure legal or similarly significant effects.
- 10.3 We will only use Personal Data for the purposes for which we collected it. It may however be possible that we reasonably consider that we need to use it for another purpose, which is compatible with the initial purpose. If we need to use your Personal Data for an unrelated purpose, we will notify you.
- 10.4 DTN does not sell or rent your Personal Data to third parties. When you give us Personal Data, DTN will not share that information with third parties without your permission, other than for the limited exceptions and purposes described in this Policy or as otherwise permitted by applicable law.

## 11 Legal grounds

- 11.1 We may rely on the following legal grounds when process Personal Data:
- 11.2 **Contract:** we may process Personal Data as the processing is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract.
- 11.3 **Consent:** we may rely on your consent for the processing of Personal Data for one or more specific purposes.
- 11.4 **Legitimate interests of DTN:** we may process Personal Data as the processing is necessary for the purposes of the legitimate interests pursued by DTN or a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of Personal Data, in particular where you are a child. Such legitimate interests include:
- 11.4.1 **Our products and services:** to provide, promote and improve products and services;

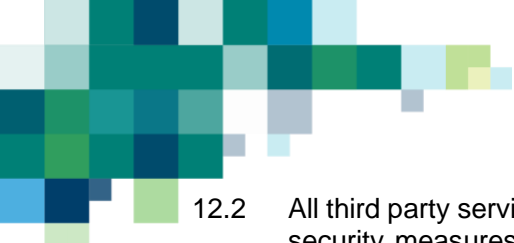


- 11.4.2 **Interaction:** to interact and communicate with prospects, customers, suppliers and other third parties;
  - 11.4.3 **Events:** to organise events for you;
  - 11.4.4 **Access:** to you with access to our products and services (including by means of verification of your identity and login data);
  - 11.4.5 **Business operations:** to manage DTN's business operations and complying with internal procedures and policies;
  - 11.4.6 **Procurement:** to purchase products and services and communicate with the (representatives of the) companies that supply such;
  - 11.4.7 **Support:** supporting suppliers;
  - 11.4.8 **Security:** to secure the DTN property;
  - 11.4.9 **(Direct) marketing:** to deliver information about our products and services, market insights and specialty knowledge we believe is welcomed by our business clients, subscribers and individuals who have interacted with us;
  - 11.4.10 **Changes in our business and organization:** we may restructure, expand or reduce our business and this may involve the sale and/or transfer of control of all or part of our business. Any Personal Data that you have provided will, where it is relevant to any part of our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Statement, be permitted to use that Personal Data only for the same purposes for which it was originally collected.
- 11.5 **Legal obligations:** we may process Personal Data as this is necessary for compliance with a legal obligation to which DTN is subject.

## 12 Recipients of Personal Data

- 12.1 The following (categories of) third-party service providers receive Personal Data:
- 12.1.1 The companies providing software;
  - 12.1.2 The companies providing product development services;
  - 12.1.3 The party providing financial services;
  - 12.1.4 Our IT system support company;
  - 12.1.5 The marketing services providers;
  - 12.1.6 Our financial partners;
  - 12.1.7 Other parties that support us in providing our services e.g. providers of telecommunication systems, archiving services, data management and cloud-based software services (e.g. our online marketing and sales tools).





12.2 All third party service providers and other entities in the group are required to take appropriate security measures to protect Personal Data as set out in our policies. We do not allow our third-party service providers to use Personal Data for their own purposes.

12.3 We may share Personal Data with other third parties, for example in the context of a possible sale or restructuring of the business. We may also need to share Personal Data with a supervising authority or a regulatory body, or to otherwise comply with the law or the legal obligations that DTN is subject to.

**13 Intragroup sharing of Personal Data**

13.1 Where necessary, Personal Data may be shared with the DTN Companies for administrative purposes, for business restructuring purposes and to provide professional services to our customers, as part of our regular reporting activities on company performance, for system maintenance support and hosting of data.

13.2 The DTN entities are located everywhere around the world. We may share Personal Data with DTN Companies not located within the European Economic Area (hereinafter: “EEA”).

13.3 To safeguard the transfer within the DTN Companies, all entities have entered into a Intragroup Personal Data Transfer Agreement. This agreement includes the contractual model clauses. Should you wish to review such safeguards, please contact us via the details as included in this Policy.

**14 Transfer of Personal Data outside the EEA**

14.1 Our partners are located throughout the world. Depending on the scope of your interactions with DTN, your Personal Data may be stored in or accessed from multiple countries, including the United States. Whenever we transfer Personal Data or make it available outside of the jurisdiction where we collected it, we will ensure that the information is transferred in accordance with this Privacy Policy and as permitted by applicable data protection laws, such as but not limited to the GDPR. If applicable, you may obtain a copy of the applicable safeguards. An overview of transfers is provided to table 1 as attached to this Policy.


**15 Retention**

15.1 DTN will retain your Personal Data for as long as necessary for the purposes we collected it for. Specific retention times can be found in table 2 as attached to this Policy. Please note that these retention times apply under the condition that should DTN be required to store the Personal Data for a longer period of time, DTN may do so.

**16 Security Measures**

16.1 DTN strives to protect and secure Personal Data in the most optimal way. ISO-certifications form a large part of our endeavours in this respect and we are constantly working on improving our standards throughout the DTN Companies. The DTN Companies comply with the security standards as reflected in the applicable laws and legislation in this respect such as but not limited to the GDPR.

16.2 DTN holds a wide range of international certifications, based on globally recognized standards such as ISO 9001, ISO 27001, ISO 22301, ISO 45001 and ISO 14001. These certifications are unique to each DTN company\* and are an independent endorsement to the superior level of quality with which we operate and enables us to make certain that the services we deliver



to our clients are of consistent high quality, secure, compliant and fit for purpose. \*Please note that 'DTN' in this provision refers to DTN generic branding, however the entity names may differ. The exact certified entity is indicated on each certificate.

16.3 To learn more about the ISO 27001, [click here](#) to download.

## 17 Your obligations and Rights

17.1 It is important that your Personal Data is accurate and up to date. Please therefore keep us informed via the means we provide to you.

17.2 Upon a reasonable request, Users of which the processing of Personal Data is covered by the GDPR may have the following rights:

17.2.1 **Request access** to your Personal Data (known as a 'data subject access request');

17.2.2 **Request correction** of the Personal Data that we hold about you;

17.2.3 **Request erasure** of your Personal Data;

17.2.4 **Object** to processing of your Personal Data;

17.2.5 **Request the restriction** of processing of your Personal Data;

17.2.6 **Request the transfer** of your Personal Data to another party;

17.2.7 **Withdrawal of consent** that you have previously provided. This will not affect the lawfulness of any processing carried out before you withdraw your consent. It may mean we are not able to provide certain products or Services to you and we will advise you if this is the case;


17.2.8 **File a complaint** with the appropriate data protection authority.

17.3 To invoke your rights, you may contact us by using the information provided in this Policy. In order to comply with these requests, we may ask you to verify your identity. Please note that your rights may be limited in certain cases – for example, if fulfilling your request would reveal information about another person, or if you ask to delete Personal Data which we are permitted by law or have compelling legitimate interests to keep. Permissible changes will be reflected in our databases within a reasonable period of time.

## 18 California Residents

18.1 The California Consumer Privacy Act of 2018 (the "CCPA") requires DTN to make certain disclosures that already are covered in this Policy. This section provides an overview of the information required by the CCPA and an includes a description of how California residents can exercise the rights available under the CCPA.

18.2 In order to operate the Application and to maximize your experience, we have collected and used in the past 12 months the Personal Data described in section 5 of this Policy, which includes the following categories of information as defined by the CCPA: identifiers, internet or other similar network activity, and location data. The sources from which we collect your Personal Data are also provided in section 5 and further details regarding the business



purposes for our collection are set forth in section 10. Section 12 of this Policy describes the categories of third parties with which your Personal Data may have been shared in the last 12 months.

18.3 DTN does not and does not intend in the future to sell your Personal Data.

18.4 Under the CCPA, California consumers have certain rights similar to those set forth in section 17. The following information further explains these rights, provides instructions for submitting CCPA requests, and generally describes the process DTN will use to verify and respond to CCPA requests:

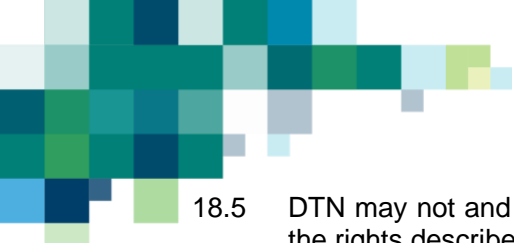
18.4.1 You may request twice within a 12 month period that DTN disclose the categories of Personal Data collected about you in the 12 months preceding your request, the categories of sources from which the Personal Data was collected, the business or commercial purposes for which Personal Data was collected, and the categories of third parties with whom DTN shared your Personal Data. You may also make a request for the specific pieces of Personal Data that we have collected about you. If we are able to provide this information electronically, we will do so in a portable format.

18.4.2 Additionally, you have the right to request that DTN delete your Personal Data from our systems. DTN will take reasonable steps to fulfil your request, however, in certain circumstances we will be unable to delete all of your Personal Data as DTN is lawfully authorized to retain certain categories of your Personal Data for legitimate business and regulatory purposes. In instances where DTN is not required to delete of your Personal Data, DTN will notify you of those categories of Personal Data that we did not delete and will provide an explanation as to why the information could not be deleted.

18.4.3 Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your Personal Data. Please note that DTN must be able to verify your identity in order to comply with your requests under this section. To do so, DTN will seek to associate the information provided by you when making a request with Personal Data we have collected about you previously. If we are unable to appropriately verify your identity, we may ask you to contact us to provide additional information or explain why we are unable to complete your request. If you are requesting specific pieces of Personal Data as the authorized agent of a California consumer, we will ask you also to submit reliable proof that you have been authorized in writing by the consumer to act on such consumer's behalf.

18.4.4 California residents may submit any of the requests described in this section by email to [privacy@dtn.com](mailto:privacy@dtn.com). Please include with your request your full name, preferred contact information and the nature of your request. Making a verifiable consumer request does not require you to create an account with us.

18.4.5 We endeavor to respond to verifiable consumer requests within 45 days of receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

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- 18.5 DTN may not and will not discriminate against any California consumer for exercising any of the rights described in this section, including in terms of price or services that we offer.
- 18.6 California Civil Code Section 1798.83, also known as California’s “Shine the Light” law, also allows California residents to request certain information regarding our disclosures in the prior calendar year, if any, of Personal Data to third parties for their own direct marketing purposes. If applicable, you may be able to opt-out of our sharing of your Personal Data with unaffiliated third parties for the third parties’ direct marketing purposes. Please send your request under Section 1798.83 (along with your full name, email address, postal address, and the subject line labelled “Your California Privacy Rights”) to [privacy@dtn.com](mailto:privacy@dtn.com). We will attempt to provide you with the requested information within 30 days of receipt. Please note that not all Personal Data sharing is covered by Section 1798.83’s requirements.

## 19 Links and Third Party Websites

- 19.1 The Sites may contain links to other websites. Please be aware that we are not responsible for the privacy practices or the content of such other websites. We encourage our Users to read the privacy statements of each and every website they visit. This Policy applies solely to information collected by us through the Sites and does not apply to these third-party websites. The ability to access information of third parties from the Services, or links to other websites or locations, is for your convenience and does not signify our endorsement of such third parties, their products, their services, other websites, locations, or their content.
- 19.2 Also, DTN may allow select third parties to offer subscription services or fee-based products through the Sites. DTN makes no guarantees in regard to the policies of these parties, so you should investigate each site’s privacy policy before providing Personal Data to third parties.

## 20 Children Should Not Provide Information to Us


- 20.1 None of our Services are intended for use by children, and we have no desire to collect Personal Data from those under the age of 13 (“**Children**”). DTN requests that Children DO NOT provide Personal Data to us. In an instance where such Personal Data was collected it would be purely accidental and unintentional. If we become aware that Personal Data has been submitted by a Child, the information will be deleted from the DTN databases. DTN encourages parents to discuss the Internet with their Children and monitor Personal Data that a Child may provide via the Internet.

## 21 Change in Ownership

- 21.1 In the event of a change in ownership of DTN as a result of a sale, merger, acquisition or bankruptcy, then DTN reserves the right to, subject to this Policy, transfer all of your Personal Data to a separate entity. DTN will use commercially reasonable efforts to notify you (e.g., by posting on its Sites, issuing a press release, or notification by e-mail) of any change in ownership.

## 22 Policy Changes & Updating Information

- 22.1 DTN reserves the right to modify this Policy whenever the need arises. Updates to this Policy will be posted to the Services in a timely manner. When such updates are made, the “last updated” date at the top of this Policy will be modified. This policy is not a contractual agreement and does not provide you with any legal right. Unless otherwise specified, the Sites, its content, and its domain name and URLs are the sole property of DTN.



**23 Questions**

23.1 Should you have any questions, you may contact us via the following details:

**EU / EEA citizens:**

MeteoGroup Nederland B.V.  
Att. Sylvia van Zijderveld  
P.O. Box 24092,  
3502 MB Utrecht

**Non-EU / EEA citizens:**

DTN, LLC  
ATTN: Privacy/Marketing  
11400 Rupp Drive  
Burnsville, MN 55337  
Phone: 1-800-485-4000  
Email: [privacy@dtn.com](mailto:privacy@dtn.com)

23.2 DTN will investigate and attempt to resolve complaints and disputes regarding use and disclosure of Personal Data by reference to the principles contained in this Statement.



Table 1

Categories of recipients inside the EEA (including names of recipients as an example)	Arrangements
<b>IT and Technology services providers</b> <ul style="list-style-type: none"> <li>• MTI</li> <li>• Piksel</li> <li>• EPAM</li> <li>• JKP</li> </ul>	Data Processing Agreement
<b>Financial software providers</b> <ul style="list-style-type: none"> <li>• People Soft</li> </ul>	Data Processing Agreement
<b>Tax Authorities and Agencies</b> <ul style="list-style-type: none"> <li>• Local Tax Authorities</li> </ul>	A data processing agreement is not required since this category of recipients is a controller itself.
<b>Accountants and auditors</b> Various accountants and auditors (e.g. PWC, Splendor, Grant Thornton, vRP (ISO), TÜV Nord)	Data processing agreements are not required.
<b>Office Software applications</b> <ul style="list-style-type: none"> <li>• Microsoft Office 365</li> <li>• Amazon Web Services (Frankfurt / Ireland)</li> </ul>	Data Processing T&C as part of Service Agreement
<b>Communication solution providers</b> <ul style="list-style-type: none"> <li>• VoIP Studio</li> </ul>	Data Processing Agreement
<b>Resellers / partners of MeteoGroup</b> <ul style="list-style-type: none"> <li>• E.g. Kisters</li> </ul>	Data processing agreements may be required, this will be decided on a one-by-one case (e.g. with Kisters a DPA is available).
<b>Analytics tools</b> Google Analytics and Google Firebase Segment	<a href="https://cloud.google.com/terms/data-processing-terms">https://cloud.google.com/terms/data-processing-terms</a> <a href="https://segment.com/legal/data-protection-addendum/">https://segment.com/legal/data-protection-addendum/</a>
<b>Replicon Project Management Software</b>	Data Processing Agreement

Categories of recipients outside EEA	Location	Safeguards
<b>DTN and MeteoGroup entities outside EEA</b>	Philippines, USA, Canada, Switzerland, UK, Australia	Adequacy decisions (Canada and Switzerland) Intragroup Personal Data Transfer Agreement (including Standard Contractual Clauses)
<b>Document Management System Software providers</b> <ul style="list-style-type: none"> <li>• Box</li> </ul>	USA (Data is stored inside EEA via Box Zones)	Data Processing Agreement including Standard Contractual Clauses (SCC) Corporate Binding Rules Privacy Shield (invalid as of 16-7-2020)
<b>Contract Management System Software providers</b> <ul style="list-style-type: none"> <li>• Concordnow.com</li> </ul>	USA (Data is stored inside EEA)	Data Processing arrangements in Privacy Policy

Table 2

Record type	Access	Retention Period
<p><b>Customer data in our Finance Systems (PeopleSoft, Afas Profit, servers and previous used systems such as Aptos and Sage) and Order Management System</b> Name and contact details (address, email and phone number), bank account numbers</p>	<p>Finance employees (admin staff) Financial Controllers Head of Accounting Accounting Manager</p>	<p><b>7 years</b> after approval of Financial Statement / Annual Report (Tax Law) - global retention period therefore is <b>10 years</b></p>
<p><b>Supplier data in our Finance Systems, PeopleSoft, Afas Profit, servers and previous used systems such as Aptos and Sage)</b> Name and contact details (address, email and phone number), bank account numbers</p>	<p>Finance employees (admin staff) Financial Controllers Head of Accounting Accounting Manager</p>	<p><b>7 years</b> after approval of Financial Statement / Annual Report (Tax Law) - global retention period therefore is <b>10 years</b></p>
<p><b>Customer data in Sales Systems (SalesForce Service Cloud)</b> Name, contact details (address, email, phone number)</p>	<p>Customer Service Contract Manager Sales staff Account Managers SF Administrators (elevated rights)</p>	<p><b>During the contract</b> period if data has financial impact: <b>7 years</b> after approval of Financial Statement / Annual Report (Tax Law) - global retention period therefore is <b>10 years</b></p>
<p><b>Credit card information in our Order Management System or via Online Bill Pay Portal and/or CyberSource</b> Credit card number replaced by token ID in Order Management</p>	<p>Finance and admin staff Head of Accounting Accounting manager</p>	<p>DTN does <b>not</b> store customer credit card information</p>
<p><b>Data of customers, ex-customers, prospects and other contacts in Marketing Systems (Eloqua)</b> Name, contact details (address, email, phone number)</p>	<p>Global Marketing Automation Manager MarCom Operations</p>	<p><b>3 years</b> (for ex customers and prospects/contacts older than 3 years who haven't engaged with Eloqua emails/forms in the past 24 months) or <b>&lt; 1 month</b> in case of <b>opt-out</b>.</p>
<p><b>Contract data in Contract Management Systems (Concordnow)</b> Name, contact details (address, email, phone number)</p>	<p>Contract Manager</p>	<p><b>During the contract</b> period if data has financial impact: <b>7 years</b> after approval of Financial Statement / Annual Report (Tax Law) - global retention period therefore is <b>10 years</b></p>
<p><b>Customer data in our Production Systems (such as PPF Weather Room, RMI Platform Data Provisioning, Energy platform, Armorhead, RBS, MeteoGuard, Microsoft Access Scripts, RoadMaster, etc.)</b> Name and contact details (email address, fax and telephone numbers), FTP credentials</p>	<p>Employees of the Weather Rooms, Product and Data Provisioning team, Developers (internal and</p>	<p><b>During the contract</b> period if data has financial impact: <b>7 years</b> after approval of Financial Statement / Annual Report</p>

Record type	Access	Retention Period
	external such as EPAM).	(Tax Law) - global retention period therefore is <b>10 years</b>
<b>Customer data in WSO Weather Sentry Online</b> Name and contact details (recipient / account information) first name and last name, email address, IP address, client ID and Secret (username/password) encrypted, geo location(s) including user location, (company) address, telephone number	Customer Service Product Management Developers Team Weather Room All DTN employees with active login	No longer than necessary for the performance of the service or use of the product.
<b>Customer data in Authentication Management Tool of Weather API and Marine API</b> Name and contact details (email address, (company) address, telephone numbers), client ID and Secret (encrypted)	Product Management Developers All MeteoGroup / DTN employees with active login	No longer than necessary for the performance of the service. Client secret (password) is sent once and not stored.
<b>Personal data in Weather API and Marine API logs:</b> Personal data long logs: parameters, endpoint, client ID, geo location (coordinates), request time stamp, request. Purpose: Generate automated usage reports, prepare data for potential load test scenarios (more accurate simulation of production load to optimize product), issue discovery and problem solving, understanding of user cases. Personal data 2 week logs: parameters, endpoint, client/user ID, IP address, geo location (coordinates), request time stamp, request. Purpose: Generate additional information about requests that failed for any reason, used for debugging and problem solving.	Weather API Team, Production Team	Long logs: for the duration of the service, anonymized after service end.  Two (2) week logs: 2 weeks
<b>Customer data in SPOS, RBS SPOS and Informix Database</b> Name, email addresses and passwords of ship captains	Customer Service Product Management Developers	<b>During the contract</b> period if data has financial impact: <b>7 years</b> after approval of Financial Statement / Annual Report (Tax Law) - global retention period therefore is <b>10 years</b>
<b>Customer data in RouteGuard, FleetGuard, RBS, Armorhead and Informix Database</b> Name, email addresses and passwords of ship captains and customer operators	Customer Service Product Management Developers Team Weather Room Route Analysts Note: This includes our team in Manila PH.	<b>During the contract</b> period if data has financial impact: <b>7 years</b> after approval of Financial Statement / Annual Report (Tax Law) - global retention period therefore is <b>10 years</b>
<b>Customer data in RBS Offshore dataset for PDF forecasts and OCW (Offshore Customer Website), Informix Database</b>	Customer Service (RBS GUI)	<b>During the contract</b> period if data has financial

Record type	Access	Retention Period
Name, email addresses and passwords of operators	Product Management Developers Offshore team Weather Room	impact: <b>7 years</b> after approval of Financial Statement / Annual Report (Tax Law) - global retention period therefore is <b>10 years</b>
<b>Customer data in WWP Weather Window Planner Admin, MySQL Database, webapp.nowcastingint.com</b> Name, email addresses, usernames and passwords of operators	Customer Service Product Management Developers	<b>During the contract</b> period if data has financial impact: <b>7 years</b> after approval of Financial Statement / Annual Report (Tax Law) - global retention period therefore is <b>10 years</b>
<b>Customer data in Nowcasting Pro Administration, MySQL Database</b> Name, email addresses, usernames and passwords of operators	Customer Service NCPro6 superuser Product Management Developers	<b>During the contract</b> period if data has financial impact: <b>7 years</b> after approval of Financial Statement / Annual Report (Tax Law) - global retention period therefore is <b>10 years</b>
<b>Customer data in MetOceanPro Admin / MetOcean Data Server</b> Name, email addresses, usernames and passwords of operators	Customer Service MetOcean Analyst Product Management Back Office Team System Administrator	<b>During the contract</b> period if data has financial impact: <b>7 years</b> after approval of Financial Statement / Annual Report (Tax Law) - global retention period therefore is <b>10 years</b>
<b>Customer data in Weather Room Apps for forecaster discussion, Presentation Creator and FOD Creator, Churada</b> Email addresses of operators	Customer Service (RBS GUI) Product Management Developers Offshore team Weather Room	No longer than necessary for the performance of the service.
<b>Social media export functionalities via Social Media Platform H4</b> Facebook, Twitter and YouTube accounts of customers/prospects of Weather Presenter (only when manually provided by user)	n/a	Data is not stored locally. API/Plugin provided by Social Media platforms used.
<b>Customer data for HydroMaster trials</b> Name (first and last name), address, email addresses, phone numbers (including mobile), Twitter account	Sales staff with customer credentials Product Manager Developers	No longer than necessary for the performance of the service.

Record type	Access	Retention Period
	Third parties (Kisters, DHI)	
<b>User data in Zima / Glaette 24 (KDM)</b> Name, email addresses, usernames, passwords, phone numbers	Customer Service Product Management Sales/Account Managers Platform Team Forecasters Weather Room Germany/Poland Developers Third party: Pikel	No longer than necessary for the performance of the service.
<b>Customer data in RoadMaster Action Log Distribution List (RMP MongoDB, AWS Ireland)</b> Email addresses	Customer Service Product Management Sales/Account Managers Platform Team Forecasters Weather Room Developers	No longer than necessary for the performance of the service.
<b>User data in RoadMaster Mobile App CSC Database</b> Email addresses	Customer Service Product Management Sales/Account Managers Developers	No longer than necessary for the performance of the service.
<b>Customer data in Transport customer contacts (Gladheid.nl, RoadMaster, RunwayMaster, Aircraft IceGuard, RBS Informix, UCS MySQL, AWS Ireland)</b> Names, email addresses, phone numbers	Customer Service Product Management Sales/Account Managers Developers	No longer than necessary for the performance of the service.
<b>Customer data in Transport Email Distribution List (RBS Informix UCS MySQL, AWS Ireland)</b> Email addresses	Customer Service Product Management Sales/Account Managers Developers	No longer than necessary for the performance of the service.
<b>User data in Transport website users Gladheid.nl, RoadMaster, Vinterhalka, RunwayMaster, Aircraft Iceguard (RBS Informix UCS MySQL, AWS Ireland)</b> Names, email addresses, usernames and passwords	Customer Service Product Management Sales/Account Managers Developers	No longer than necessary for the performance of the service.
<b>Customer data in MeteoFeed (Telehouse DB)</b> Names, email addresses, client ID, FTP credentials	Product Director Weather Data Sales Customer Service	No longer than necessary for the performance of the service.



Record type	Access	Retention Period
	Data Integration Team Developers	
<b>Customer data in KUBE (cluster DB)</b> Names, email addresses, client ID, FTP credentials	Product Director Weather Data Sales Customer Service Data Integration Team Developers	No longer than necessary for the performance of the service.
<b>Customer data in Lightning Tracker</b> Names, email addresses	Product Director Weather Data Persons with dedicated access rights	No longer than necessary for the performance of the service.
<b>Customer data for severe weather warning services</b> Names, email addresses, phone numbers	Product Director Weather Data Platform Team	No longer than necessary for the performance of the service.
<b>Personal data from contracting partners and station operators of Measurement Network Germany and Switzerland (Messnetz, Metrilog, KUBE, Excel, Confluence), including mailing lists</b> Names, email addresses, telephone numbers, WhatsApp, geolocation and coordinates of weather stations, photographs (this may include private properties)	Measurement Network Team Data Quality Team Manila PH	No longer than necessary for the performance of the service.
<b>Facilities access data and images from surveillance cameras (CCTV)</b> Key card (“badge”) number and CCTV recordings which may be associated with the building(s) and carpark(s) to which you have access to each location, the reason(s) for which you were given access, “access data” (including the time you entered and exited security checkpoints using your badge or as a recording on CCTV), or similar information, all in accordance with applicable law.	Back Office Team staff (admins).  Keycards, tokens and badges administration: Dedicated Reception / Admin staff and building management.  Employees defined in CCTV protocol	Facility access data: <b>Within 1 month</b> after your visit.  CCTV: <b>1 month</b> , unless those images can contribute to prove an offense, damage, incivility or allow to identify a perpetrator, a disruptor of the public order, a witness or a victim.
<b>Photographs and video images for company use and commercial use</b>	BOT Service manager / web design	MeteoGroup has a legitimate interest for publishing photographs on website and commercial material, however will only do this with prior consent of your organization.
<b>Personal data in business emails</b> MeteoGroup has a legitimate interest to have litigation hold (set in MS Office 365) and retention time on email and will not need active consent of the data subject for this.	Employee BOT admins with special authorization	7 years



Record type	Access	Retention Period
<b>Telephone call recordings</b> Name and surname, contact details (if provided during call), date/time of recording	BOT Team Lead Third parties: MTI VoIP Studio	No longer than necessary for the purpose of use, however with a maximum of 6 months