Latest Update: 08.10.2026

This page informs you of our policies regarding the collection, use and disclosure of Personal Information we receive about users of the Transporeon Freight Audit.

Privacy Policy

By using the Transporeon Freight Audit web-based modules (also referred to as the "system" or “platform”), you agree to the collection and use of information in accordance with this policy.

Who does this Privacy Policy apply to and how to contact us?

This privacy notice applies to data processing by the controller:

ControlPay B.V.
Industrieweg 187A
5683 CC Best
Netherlands
(from this point on also referred to or mentioned as “Transporeon Freight Audit”, "us", "we", or "our")

We act as a data controller for all personal data collected by Transporeon Freight Audit, and we may request any of Transporeon Freight Audit's divisions to perform processing activities depending on the business specifics. We process personal data as safely and reasonably as possible and in strict compliance with the applicable data protection legislation, including the EU General Data Protection Regulation 2016/679 (“GDPR”), Brazil’s Lei Geral de Proteção de Dados, the Brazilian General Data Protection Law, Federal Law no. 13,853/2019 (“LGPD”), and, in respect of artificial intelligence features made available on the platform, Regulation (EU) 2024/1689 laying down harmonised rules on artificial intelligence (the “EU AI Act”).

Data protection queries can be sent to the group data protection officer at Transporeon, parent company of ControlPay B.V., via email to transporeon_dataprotection@trimble.com or you can send your request by post to the following address:

Transporeon GmbH
Data Protection Officer
Heidenheimer Straße 55/1
89075 Ulm
Germany

For questions related to LGPD (Brazil), reach out via email to: customerservicebr@transporeon.com.

What is covered by this Privacy Policy?

This Privacy Policy tells you:

- which personal data we collect and process;
- how we store and process your personal data while we perform freight audit-related business activities;
- what your rights are and whom you may contact for more information or queries.

Which personal data do we collect?

While performing business-related activities in the system, we may ask you to provide us with personal data that can be used to contact or identify you in terms of freight audit activities.

The following personal data of yours is collected and processed: your full name and salutation; your business contact details such as e-mail address and phone number; your position; your IP address («Personal Information»).

How do we obtain your personal data?

We may obtain your personal data:

- due to the fact that you have provided it to us (e.g. via the system, the Service Desk platform, an e-mail you sent to us, via a contract we have with you), or
- in the framework of the execution of our business activities, because someone else has provided it to us (a colleague of yours or your business partner) to use in the framework of Transporeon Freight Audit business activities.

How do we store and disclose your personal data?

Your personal data will be stored on our server in Europe. The defined Transporeon Freight Audit staff members, in all offices, may have access to your personal data for the business-related purposes described in this Policy.

To achieve the objective of our processing, as described above, we may allow access to your personal data outside the European Economic Area (EEA) or outside Brazil ensuring proper technical and organizational measures for the data protection. This ability is granted to Transporeon Freight Audit staff members, including those in our offices outside the EEA or Brazil. The European affiliated companies of Transporeon Freight Audit and the affiliated companies outside of the European Union or the European Economic Area have implemented and transcribed the EU standard contractual clauses in order to ensure an adequate level of data protection and to ensure compliance with the legal requirements of Art. 44 ff. GDPR. The legal basis for data transmission is Art. 6 Para. 1 clause 1 lit. f GDPR. Our legitimate interest results from the possibility to support your use of our service worldwide and in a multitude of languages. We provide your personal data to our affiliated companies, which are named at the following address: https://legal.transporeon.com/transporeon_entities.pdf. In addition, depending on the use of our services, we currently provide your personal data to the following service providers, which are named at the following address: https://legal.transporeon.com/transporeon_service_providers.pdf

According to Article 5 (e) GDPR and Article 16 LGPD, we only retain the personal data collected as long as the user's account is active or otherwise for a limited period of time as long as we need it to fulfil a reasonable business purpose.

The legal grounds for processing your personal data:

We process your personal data for the following purposes relying upon the following legal basis:

- due to the fact that you have given your consent to the processing of your personal data for purposes of improvement of our services (Article 6 (a) GDPR and Article 7 (I) LGPD) (see Cookies - Mixpanel below);
- for the purposes of the legitimate interests of our company (Article 6 (f) GDPR and Article 7 (IX) LGPD). The processing of your first name, last name, and business contact details takes place when using the system (including providing access to the system, enabling communication with users, rendering remote support and onboarding, sharing information on updates and troubleshooting). In this respect, we will always determine whether our interests are not overridden by your interests, fundamental rights and freedoms.

How is your personal data secured?

We employ strict technical and organizational (security) measures to protect your personal data from an access by unauthorized persons and against unlawful processing, accidental loss, destruction and damage, both online and offline.

These measures include:

- training relevant staff to ensure they are aware of our privacy obligations when handling personal data;

- administrative and technical controls to restrict access to personal data to Transporeon Freight Audit staff members. We use strict criteria for the access authorization to your personal data (with the approach as few people as possible) and exclusively for the specified purposes;
- technological security measures, including firewalls, encryption and anti-virus software;
- back-up systems;
- login access blocks in case of loss or theft of devices;
- physical security measures.

Our security measures comply with international standards, such as ISO27001 for the data security and availability.

How do we use your personal data for communication?

We may send you notification letters related to freight audit activities whenever particular changes in the system/related to your account in the system or some informational points appear or in case particular actions are required from your side. We may also use your e-mail or phone number in order to contact you in terms of freight audit related activities within contract obligations fulfilment.

How do we use Artificial Intelligence (AI) on the Platform?

Certain Transporeon Freight Audit modules offer AI-assisted features to help you work with freight audit issues more efficiently. This section describes how these features process personal data and is provided in addition to, and does not replace, the rest of this Privacy Policy.

- **What does the AI feature do?** The platform includes a "Summarize Issue" generative AI feature that, when you actively trigger it, produces a concise summary of an existing freight audit issue or dispute thread to help you and other users quickly understand its status and history. The feature is optional, is only activated by a user action, and does not make autonomous decisions, take automated actions, or produce any outcome with legal or similarly significant effect on you.
- **What personal data is processed?** When you trigger the AI feature, the relevant issue content (such as free-text comments, statuses and identifiers already present in the issue thread) is sent to the underlying AI model in order to generate the summary. Where the underlying issue content includes personal data you or other users have entered (for example, names or contact details mentioned in comments), that personal data may be included in the text processed by the AI feature. The feature does not access freight invoices, carrier contracts, or other Transporeon Freight Audit documents and data beyond the specific issue thread being summarized.
- **Which provider processes this data, and where?** The AI feature is powered by Google Cloud's Vertex AI generative AI models. Processing takes place exclusively within the European Union; the underlying AI provider does not use the data submitted through this feature to train its own models, and no data submitted for summarization is retained by the AI provider beyond the time needed to generate the response.
- **What is the legal basis for this processing?** We process personal data through the AI feature on the basis of our legitimate interest (Article 6(1)(f) GDPR and Article 7(IX) LGPD) in providing you with efficient tools to manage freight audit issues. As with other processing based on legitimate interests, we have assessed that this interest is not overridden by your interests, fundamental rights and freedoms, and you may exercise your right to object as described below.
- **Transparency about AI interaction.** In line with Regulation (EU) 2024/1689 (the EU AI Act), where you interact with the AI feature we will clearly identify that you are interacting with an AI system, including through in-product labeling of AI-generated summaries, unless this is obvious from the context of use.
- **Your responsibility when using AI-generated content.** AI-generated summaries are provided as an aid and may not be fully accurate or complete. You remain responsible for

reviewing AI-generated summaries against the underlying issue data before relying on them for business decisions.

What are your rights regarding personal data?

- You have the right to access the personal data that we use relating to you (Article 15 (1) GDPR and Article 18 (II) LGPD). In particular, you can request information on the processing purposes, the category of personal data, the categories of recipients to whom your data has been disclosed, the planned retention period, the rights to rectification, deletion, limitation of processing, or objection, the existence of a right to complain, the source of the data, if not collected from us, and the existence of automated decision-making including profiling and, where appropriate, meaningful information about the details;
- If your personal data is incorrect or incomplete/outdated, you can demand the correction of incorrect or completion of incomplete personal data stored with us (Article 16 GDPR and Article 18 (III) LGPD).
- You can request to erase your personal data unless processing of such data is required for exercising the right of freedom of expression and information; compliance with legal obligations; for reasons of public interest; for the establishment, exercise or defense of legal claims (Article 17 GDPR and Article 18 (VI) LGPD). You can also ask us to restrict the processing of your personal data. This is possible in the following situations: You think that your personal data is incorrect or we no longer require your personal data (Article 18 GDPR and Article 18 (IV) LGPD).
- You have the right to withdraw your previously given consent (Article 7 (3) GDPR and Article 8 (5) LGPD).
- You may receive your personal data provided to us in a structured, standard and machine-readable format or require it to be forwarded to another controller (Article 20 GDPR and Article 18 (V) LGPD);
- You can pose your complaint to the supervising authority (Member state of residence or place of work) (Article 77 GDPR and Article 18 (IX, 1) LGPD).

Right to object

If your personal data is processed based on legitimate interests in accordance with Art. 6 Para. 1 clause 1 lit. f GDPR, you have the right to file an objection against the processing of your personal data in accordance with Art. 21 GDPR provided that there are reasons for this arising from your particular situation, or the objection relates to direct advertising. In the latter case, you have a general right of objection, which is implemented by us with no requirement to give a specific reason. If you would like to exercise your right of revocation or objection, please send an e-mail to dataprotection@transporeon.com.

Cookies

Session and Setting Cookies. We use session cookies on our platform. These are small files that your browser automatically creates and that are stored on your device (laptop, tablet, smartphone, etc.) when you visit our platform. Cookies do not harm your device, do not contain viruses, trojans or other malicious software. The cookie stores information resulting in connection with the specific terminal used. However, this does not mean that we are immediately aware of your identity. The use of cookies serves to make using our online services more pleasant for you. And so we set so-called cookies to authenticate you. In addition, we also use temporary cookies that are stored on your device for a specified period of time. If you visit our Platform again to use our services, we automatically recognize that you were already on our site and note what language you chose, so you will not have to enter it again. These cookies are automatically deleted after a defined time. The data processed by cookies is required for the purposes of safeguarding our legitimate interests as well as those of third parties pursuant to Art. 6 Para. 1 clause 1 lit. f GDPR.

Mixpanel. Certain Transporeon Freight Audit modules use functions of the web analysis service Mixpanel Inc., One Front Street, 28th floor, San Francisco, CA 94111, USA (“Mixpanel”). We use Mixpanel because it allows us to measure product KPIs like churn, retention, usage frequency, usage duration, etc. and it helps us to better understand how you interact with our products (e.g. which features are most/least used, where you spend the most time, etc.) which will in turn help us to decide where to improve our products. Mixpanel uses cookies and other technologies to collect data on your behavior and your devices. We set up Mixpanel so that no personal information is being stored and a distinct ID is used for detecting if it is a new user or a recurring visitor. This distinct ID is created by us and then sent to Mixpanel. Mixpanel cannot merge the tracking data with other personal data on their end. However, we are able to do this since the distinct ID equals your user ID within our services. It contains personal data like your name or business contact details that you have stated in your user profile. For further details, please see the Mixpanel Privacy Statement: https://mixpanel.com/privacy/. We delete the analytics data about your visit after 26 months.

With Mixpanel we have implemented the EU standard contractual clauses in order to ensure an adequate level of data protection and to ensure compliance with the legal requirements of Art. 44 ff. GDPR. Additionally, an adequacy decision from the European Commission is in place for the USA and Mixpanel complies with the EU-U.S. Data Privacy Framework (DPF). To learn more about the DPF program and to view the certification, please visit https://www.dataprivacyframework.gov/. The legal basis for the web analysis is your consent according to Art. 6 Para. 1 clause 1 lit. a GDPR. You can revoke your consent in Privacy Settings on our platform at any time. Your data are then no longer used for web analysis. Further information on the opt-out can be found at: https://mixpanel.com/optout/.

Changes to this Privacy Policy

We reserve the right to update or change our Privacy Policy at any time and you should check this Privacy Policy periodically. Your continued use of the service after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy.

If we make any changes to this Privacy Policy, we will notify you either through the e-mail address you have provided us, or by placing a prominent notice on our website.