

COMPLEMENTICS DSAR — BASED ON EMAILS

Walter Harrison Co-founder & CRO 29 September:

Attached you will find the events logs that correlate to the device ID you sent to us, along with the headers. As of 9/27/20, all of these events have been deleted from our system.

Source:

Sygie Navigation: https://play.google.com/store/apps/details?id=com.tripomatic&hl=en_US

Categories:

Analytics

Third-parties:

[COMPANY REMOVED BY NRK]

Feel free to shoot over any additional questions/feedback.

Martin Gundersen 29 September

I will just state that I have not asked you to delete my data, but I have asked your company to respond to a transparency request where I have asked you to give me more context.

First of:

- 1) What is your lawful base of processing?
- 2) You mention "categories", analytics is a very broad term. Could you explain what this processing entails?
- 3) Is it correct to understand that you have shared the data with [COMPANY REMOVED BY NRK]?

Walter Harrison, 30 sept:

Happy to answer these questions.

1. **Our legal basis:** Consent and legitimate interest.
2. **Clarification on analytics:** This refers to further anonymizing the device ID (SHA256), and using the hash to look at broad scale movement overtime. This includes use cases such as: patient tracing (COVID-19), and public planning.

3. **Sharing of the data:** Yes, in the specific use-case this device ID was shared with [COMPANY REMOVED BY NRK].

App hash:

2bfef19b8fdbfe3b5bf0cd388831d0df - Sygic Navigation

Martin Gundersen 30 September

As far as I am aware, one cannot use two claims of a lawful basis of processing. Either your company have processed my data under "consent" or your company has processed my data under "legitimate interest".

** Which one have you used in this specific case?

Walter Harrison 1 October

We're inquiring on the exact method via the app source. I'll respond shortly, and thank you for your patience.

Walter Harrison 5 October

I hope you're well. I have confirmed the device ID you provided did "consent", that was the basis of the usage.

(Harrison later clarified when contacted by NRK that the data was only used for marketing analytics.)