SYMPHONY PRIVACY POLICY

VERSION: NOVEMBER 2026 EUROPE REGION

GENERAL INFORMATION (PURPOSE)

We operate a cloud-based communication solution focusing on applications for security, safety and productivity that is available through a web interface as well as a mobile application ("Symphony"). Once you have completed your registration or subscription, we will email you a confirmation message with a link for confirming your registration or subscription. Your registration and your subscription request will be reviewed by an administrator, who will either approve or decline it. You will then be notified by email whether or not your application has been approved.

This privacy policy informs you about the nature, scope and purpose of the collection and use of your personal data by Commend in connection with your registration and use of Symphony.

1. NAME AND ADRESS OF THE CONTROLLER

The controller for the processing of your personal data in accordance with the provisions of the data protection law is:

Commend International GmbH
Saalachstrasse 51
5020 Salzburg
Austria

For any inquiries and questions regarding data protection or the processing of your personal data, please contact us at privacy@commend.com.

2. PROCESSING ACTIVITIES AND LAWFULNESS OF PROCESSING

Registration:

To create your Symphony account, you need to provide the following personal details in course of the registration process:

- First name
- Last name
- Company name
- Company address
- Company country
- Email address
- Password

The processing of these personal data is required to set up your Symphony account and therefore necessary for the performance of our (pre)contractual obligations (Art 6 para 1 lit b

GDPR). Not providing the personal data mentioned above will prevent us from establishing your Symphony account.

Subscription:

In course of requesting a fee-based Symphony subscription, you need to provide the following personal details:

- Details of the chosen subscription model
- Payment details

The processing of these personal data is required to handle your Symphony subscription and therefore necessary for the performance of the contract with you (Art 6 para 1 lit b GDPR). Not providing the personal data mentioned above will prevent us from accepting your Symphony subscription.

Use of Symphony:

We process the following personal data when you use Symphony:

- IP address
- Logfiles, especially configuration changes of claimed devices and systems, historical door calls with subsequent actions such as door open, role sharing, etc.
- Images, videos and audio processed via Symphony and stored in the cloud
- Audio data, transcripts and translations during voice assistant calls
- Video-Snapshots
- Pictures of call buttons
- Contact List entries
- User Management on device
- Any free form field entry if it contains personal data

The processing of these personal data is required to provide you with the Symphony services and therefore necessary for the performance of the contract with you (Art 6 para 1 lit b GDPR). Not providing the personal data mentioned above will prevent us from providing you with the Symphony services.

To use certain features of the Symphony client applications (including mobile apps and browser-based clients), you may be required to grant access to your device's microphone and/or camera. If you enable access, audio and video data may be processed primarily on a transit basis to establish and maintain the communication session between you and the called party. We do not store live communication content (audio/video) by default. Depending on your configuration and enabled features, certain content may be stored in Symphony Cloud (e.g. snapshots, images, recordings, call-related metadata and logs) to provide the service and the functionalities you use. You can restrict or revoke these permissions at any time via your device or browser settings. If access to the camera or microphone is limited, some features of the client application may be available only to a limited extent or may not function at all.

If you use the voice assistant services, we process contact details of the employees managing the services as this is necessary for the performance of the contract with you (Art 6 para 1 lit b GDPR). Not providing the personal data mentioned above will prevent us from providing you with the Symphony services.

If you voluntarily enter the static address or location data of project sites and intercom devices, the processing of these data is based on our legitimate interests pursuant to Art 6 para 1 lit f GPDR. Our legitimate interests consist in operating, managing, and maintaining the service, ensuring operational reliability, enabling map-based visualization, and providing technical support. The processing is limited to static, user-defined location data and does not involve real-time tracking, profiling, or continuous location determination. Users remain in control of the data they provide.

Analysis and optimisation:

To be able to optimise our Symphony services, the following personal details will be collected while you use Symphony:

- Last login
- Number of logins
- Duration and frequency of use
- Access date and time
- Downloads and usage of features
- Configuration changes within the system and on connected devices in case they contain personal information, e.g. contact names
- intercom call statistics
- System failures
- Device information such as operating system, the hardware specification, the device settings, the language settings and the app version

The processing of these personal data is based on our legitimate interests in operating, maintaining and securing our Symphony services, analysing usage patterns to improve functionality, performance and user experience, detecting and preventing misuse or technical issues (Art 6 para 1 lit f GDPR).

If you use the voice assistant services and the relevant data subject has given explicit consent, we process the following voice assistant data for the purposes of anonymisation and the subsequent training and improvement of our voice assistant services:

- Voice recordings
- Transcripts

The processing of these personal data is based on the consent of the data subject (Art 6 para 1 lit a and/or Art 9 para 2 lit a GDPR). Consent may be withdrawn at any time with future effect, without affecting the lawfulness of processing carried out prior to withdrawal.

Sharing:

You have the possibility to share your Symphony services with others. Therefore, you may send invitation emails to such persons via our Platform. We process the provided email-address of the invited third party for the purpose of sending the invitation link to the registration form, only.

3. COOKIES

A cookie is a small text file that stores the visitor's website settings (such as login details, selected language, other display settings). Cookie technology is used on virtually every website on the Internet. A cookie is downloaded via your Internet browser when you visit a website for the first time. Whenever you visit that website with the same device, the stored cookie and its content will be transmitted either to the website that created it (first-party cookie), or to an associated website (third-party cookie). This allows the website to detect that your browser has loaded it before. In some cases, a different content may be displayed based on that information.

Some cookies are quite useful, as they can improve your user experience when you re-visit the same website. If you are using the same device and browser as during your first visit to the website, the cookies will identify, for example, your preferences or the way you use a web page. Based on this information the offers shown on the page can be customised to suit your individual needs and interests.

There are different types of cookies, which remain on the user's computer or mobile device for different lengths of time depending on their functions and properties: session cookies, which are automatically deleted when the browser is closed, and persistent cookies, which remain stored on the user's device for a predetermined period of time.

The Platform uses the following cookie categories:

- **Technically necessary cookies** are essential for the proper functioning of the Platform, for managing your consent preferences, ensuring data security, and preventing misuse. They enable you to use the content and services you have requested in a proper and secure manner. These cookies therefore cannot be deactivated. If you do not wish this category of cookies to be installed on your device, you are requested not to use the Platform.

  The processing of data is based on our statutory obligations pursuant to Sec 165 para 3 Austrian Telecommunications Act 2021 (Telekommunikationsgesetz 2021 – TKG 2021) in conjunction with Art 6 para 1 lit c GDPR and/or on our legitimate interests pursuant to Sec 165 para 3 TKG 2021 in conjunction with Art 6 para 1 lit f GDPR.

- **Analytics / statistics cookies** enable us to understand how the Platform is used by you and other users. They also help us to improve the functionality of our website.

  Data processing is carried out on the basis of your voluntary consent pursuant to Sec 165 para 3 TKG 2021 in conjunction with Art 6 para 1 lit a GDPR. You may revoke your consent at any time, without stating reasons, with effect for the future, for example by clicking the cookie settings button on the account settings page in the Symphony Cloud web portal and selecting "accept essential". You may customise your cookie settings individually by using the sliders and saving your preferences.

A complete list of cookies, including a description, provider, purposes, data processed, storage period, and any transfer to third countries, can be found in the cookie banner for the relevant service. The cookie banner is displayed automatically when you first access our Platform. You may also access the cookie settings at any time via the account settings in the Symphony Cloud web portal.

4. LOCATION OF PROCESSING

Personal data in course of our Symphony services will be processed mainly within the European Union. For specific purposes and based on legal basis we may also process personal data outside the European Union for distribution, either on the basis of data processing agreements that include appropriate supplementary measures or pursuant to an adequacy decision issued by the European Commission. See specific partners and territories under https://www.commend.com/rd/contact-en.

Where personal data (such as IP addresses) is transmitted to recipients acting as independent controllers - for example, third-party connectivity services (including public STUN services used for ICE candidate gathering or NTP services for time synchronisation) - those recipients process the data under their own responsibility and may be located outside the European Union.

5. RECIPIENTS

We may entrust your personal data to the extent necessary to the following external service providers (**data processors**) that support us with the performance of our Symphony services:

- IT-service providers and/or providers of data hosting solutions or similar services;
- Other service providers, providers of AI, tools and software solutions that support us with the performance of our services as well and operate on our behalf (including providers of marketing tools, marketing agencies and communication service providers).
- Platform service providers that provide integrated services, or parts of, such as mobile notifications and authorisation tokens.
- Distribution partners.

All our data processors process your data only on our behalf and on the basis of our instructions so that we can provide you with our Symphony services.

Apart from that, we transmit your personal data in the extent necessary to the following recipients (**controllers**):

- Potential third parties that are participating in the provision of services to you for the fulfilment of our contractual obligations (e.g. banks for processing of the payment, payment service providers);
- External third parties on the basis of our legitimate interests in the extent necessary (e.g. auditors and tax consultants, insurances in case of insured events, legal representatives in case of incidents);
- Authorities and other public entities in the extent legally necessary (e.g. financial authorities) or to comply with a court order, law or legal process, including any government or regulatory request.
- Distribution partners to the extent that such transfer is based on overriding legitimate interests, required for the fulfilment of (pre)contractual obligations or based on data subject's consent.

- Third-party connectivity service providers (independent controllers): To establish real-time communications, Symphony Cloud may use public STUN services for ICE candidate gathering as part of SDP signalling or NTP services for time synchronisation. In this context, such providers may receive network connection data (in particular the client's public IP address, port and timestamps). These providers process such data under their own responsibility and in accordance with their own privacy documentation.

6. RETENTION PERIOD

Your registration data will be stored until you delete your Symphony account.

Your subscription data will be stored until the end of your subscription and afterwards until the end of applicable legal retention periods (seven years from the end of the relevant business year).

Your voice records and transcripts will be stored only for as long as necessary to achieve the purpose of anonymising the data and training and improving our voice assistant services and will be deleted once these purposes have been fulfilled.

Otherwise, we delete your personal data as soon as the purpose for which we have collected and processed the data ceases to apply. Beyond this point in time, data is only stored if this is required by laws, regulations or other legal provisions of the European Union or of a member state of the European Union to which we are subject.

7. YOUR RIGHTS

You may at any time request information about the stored data concerning you. Moreover, you may under certain circumstances request rectification or erasure of your data ("right to be forgotten"). If the processing of your personal data is based on your consent, you may withdraw this consent at any time with effect for the future. You do furthermore have the right to restrict processing as well as the right to receive the personal data concerning you in a structured, commonly used and machine-readable format.

As far as we process your data for legitimate purposes, you additionally have the right to object at any time on grounds relating to your particular situation.

You also have the possibility to lodge a complaint with a supervisory authority. The authority responsible for us is: Österreichische Datenschutzbehörde, Barichgasse 40-42, A-1030 Vienna, email: dsb@dsb.gv.at (www.dsb.gv.at).

Should you have any questions, you can of course contact us as well:

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