

PRIVACY NOTICE ON THE PROCESSING OF EMPLOYEE GEOLOCATION DATA

pursuant to Art. 13 of Regulation EU 2016/679 (GDPR)

Data Controller

[Company Name Ltd.]

Registered office: [Address] — VAT: [000000000]

DPO email: [dpo@company.com]

1. Purpose of processing

Geolocation data is collected exclusively for the following purposes:

- Clocking in and out of work shifts
- Operational safety of field personnel
- Client intervention reporting and documentation
- Certified proof of work performed

2. Legal basis

Processing is based on:

- Legitimate interest of the controller (Art. 6.1.f GDPR)
- Performance of the employment contract (Art. 6.1.b GDPR)
- Legal obligations regarding workplace safety and organization

3. Data collected and minimization

Only GPS coordinates at the time of clocking in and out are collected. No continuous location tracking is performed. Data is linked to the device identifier and the timestamp of the detection.

No data is collected outside working hours or during breaks.

4. Retention period

Data is retained for a maximum of 12 months from the date of collection, unless different legal obligations apply (e.g. ongoing litigation).

5. Recipients and transfers

Data is accessible only to the employer and expressly authorized parties (e.g. HR manager, payroll consultant).

Data is stored on EU cloud infrastructure (Firebase/Google Cloud) with appropriate contractual safeguards under Art. 28 GDPR.

6. Security

Data is protected by:

- Encryption in transit (TLS) and at rest (AES-256)

- Company-level segregation (multi-tenancy)
- Role-based access with two-factor authentication
- Audit logging of access operations

7. Data subject rights

The data subject has the right to:

- Access their geolocation data (Art. 15 GDPR)
 - Rectification of inaccurate data (Art. 16 GDPR)
 - Erasure within applicable limits (Art. 17 GDPR)
 - Restriction of processing (Art. 18 GDPR)
 - Object to processing (Art. 21 GDPR)
 - Data portability (Art. 20 GDPR)
 - Lodge a complaint with the supervisory authority
-

ACKNOWLEDGEMENT AND ACCEPTANCE

Employee full name: _____

Date: _____

Signature: _____

This document was digitally signed via GeoTapp Flow.
Signature data (date, time, IP address) is securely and immutably archived.