CarLogistic Privacy Policy

Version 1.0 · Effective 6 September 2026

This Privacy Policy explains how IL KOTE DOO, trading as CarLogistic (the "Operator", "we", "us"), collects, uses and protects personal data when you use the CarLogistic web and mobile applications (the "Service"). It is written to meet the requirements of the EU General Data Protection Regulation (GDPR) and the Montenegrin Law on Personal Data Protection.

Controller: IL KOTE DOO, tax ID (PIB) 03613259, Mainski put bb, 85310 Budva, Montenegro; e-mail kotelnikov.ilya@gmail.com, phone +382 67 821 458. Contact for privacy matters: kotelnikov.ilya@gmail.com.

1. Our roles: controller and processor

1. **We are the controller** for data about the people who use the Service: company owners and team members (account data, usage data, support correspondence).
2. **We are a processor** for data that a Customer enters into the Service about third parties — its renters, drivers, clients and employees ("Customer Data"). The Customer is the controller of this data and decides why and how it is processed. We process it only on the Customer's instructions as described in the Terms of Service and, on request, a Data Processing Agreement.

2. What data we collect

Account and registration data: company name, tax ID, country, first and last name, work email, phone number, role in the company, password (stored as a hash only).

Team members: name, work email and role entered by the Owner or manager who invites them.

Customer Data entered by you: vehicle details and photos, rental orders, renter name and contact details, delivery and return addresses, handover notes, maintenance and reminder records, vehicle locations.

Device data collected by the mobile app, only when you use the corresponding feature and after the operating system asks for your permission:

- **Location** — to place a vehicle on the map or record where it is parked. Location is captured only when you actively use the location feature, not in the background.

- **Camera and photos** — to attach a vehicle photo or scan a document. Text recognition runs on the device.

Technical data: IP address, device type and OS version, app version, language, session identifiers, request logs and error reports needed to keep the Service secure and working.

Support data: what you send us when you contact support.

We do not collect special categories of personal data and do not knowingly process data of children under 18.

3. Why we process data and on what legal basis

Purpose	**Legal basis (GDPR Art. 6)**
Creating and operating your account, providing the Service, sending setup and security emails	Performance of a contract, Art. 6(1)(b)
Billing, accounting and tax records	Legal obligation, Art. 6(1)(c)
Securing the Service, preventing abuse, logging, backups	Legitimate interest, Art. 6(1)(f)
Improving the Service, understanding how features are used (aggregated, no advertising)	Legitimate interest, Art. 6(1)(f)
Service notices about changes to Terms, plans or prices	Contract and legitimate interest
Marketing emails about new features or plans	Consent, Art. 6(1)(a) — you can opt out at any time
Using device location or camera	Your permission granted in the operating system; processing under the contract
Customer Data about renters and drivers	Processed on the Customer's instructions (Art. 28)

4. Cookies and sessions

The web application and the mobile app use a session cookie and a CSRF token to keep you signed in and protect against forged requests. These are strictly necessary and are not used for

advertising or cross-site tracking. The mobile app stores the session in the device's secure storage.

5. Who we share data with

We do not sell personal data. We share it only with:

- **Service providers (sub-processors)** that host the Service, deliver email and provide infrastructure, under contracts that require them to protect the data and act only on our instructions. The current list of sub-processors is available on request.
- **Map providers** — when the map is displayed, the app requests map tiles from OpenStreetMap or another tile provider; the provider receives your IP address and the area of the map shown, but not the identity of the vehicle.
- **Your company** — the Owner and managers of the Customer's account can see the data of team members and Customer Data according to their roles.
- **Authorities** — where required by law or to protect rights, safety and property.
- **A successor** — if the Service is transferred to another operator, under the same obligations.

6. International transfers

Data is stored in the European Economic Area or in Montenegro. If a service provider processes data outside these territories, we rely on an adequacy decision or the EU Standard Contractual Clauses and additional safeguards.

7. How long we keep data

- Account data: for as long as the account exists and for 12 months after closure, unless a longer period is required by law.
- Customer Data: for as long as the Customer's account exists; available for export for 30 days after termination, then deleted from active systems. Backups are rotated within 90 days.
- Billing and tax records: as required by accounting law (typically up to 10 years).
- Technical logs: up to 12 months.
- Support correspondence: up to 3 years.

8. Security

We use encryption in transit (TLS), hashed passwords, role-based access control, logging and regular backups. Access to production data is limited to authorised personnel bound by confidentiality. No system is completely secure; if a breach affecting your data occurs, we will notify you and the supervisory authority as required by law.

9. Your rights

Under the GDPR you have the right to:

- **access** the personal data we hold about you;
- **rectify** inaccurate or incomplete data;
- **erase** your data ("right to be forgotten"), subject to legal retention duties;
- **restrict** processing in certain cases;
- **data portability** — receive your data in a machine-readable format;
- **object** to processing based on legitimate interest, including direct marketing;
- **withdraw consent** at any time, without affecting the lawfulness of processing before withdrawal;
- **lodge a complaint** with a supervisory authority — in Montenegro, the Agency for Personal Data Protection and Free Access to Information (AZLP), or the authority of the EU member state where you live or work.

To exercise your rights, email kotelnikov.ilya@gmail.com. We respond within one month. If your request concerns Customer Data entered by a company, we will forward it to that company as the controller, or ask you to contact it directly.

10. Automated decision-making

We do not make decisions with legal or similarly significant effects based solely on automated processing.

11. Changes to this Policy

We may update this Policy to reflect changes in the Service or the law. The current version, with its version number and effective date, is always available in the Service. For material changes we will notify the account Owner by email or in the Service before they take effect.

12. Contact

Privacy requests and general support: kotelnikov.ilya@gmail.com, +382 67 821 458 IL KOTE DOO (CarLogistic) · Mainski put bb, 85310 Budva, Montenegro · carlogistic.org