

PRIVACY STATEMENT Utonomy B.V.

Version 1.0, 17 December 2025

1. Why this privacy statement exists

At Upod by Utonomy, everything revolves around your data and especially your control over it. In this privacy statement, we explain in plain language:

- what data we process,
- why we do it,
- who can access it (only if you approve),
- and how you always remain in control of your data.

2. Who we are

Upod is offered by Utonomy B.V. ("Utonomy"). We help you securely store your data in your personal data store and decide who gets access to your data.

3. Your personal data store

Upod works with a personal data store ("pod"). This is your digital vault. You can choose:

- whether we automatically create a data store for you at Stichting Nederlandse Datakluis (SNDK),
- or that you link your own data store (Solid pod) to Upod.

Whichever option you use: the data store is yours. You decide what goes in it and who can access it.

4. What data we process

4.1 Data you enter yourself

When you start using Upod, we help you get started and ask you a few questions. Think of:

- general information (e.g., age group, place of residence),
- preferences and interests,
- answers you give to use Upod properly,
- your consents: you indicate whether a website can see your data and for what purpose.

You always choose what you enter. We store this data for you in your personal data store. The data is readable only by you. You can view, change, and delete all this data at any time.

4.2 Data generated during use

Such as:

- your username and password,
- the internet location of your personal data store (WebID),
- your choice whether you want to receive messages from us about using Upod,
- log data necessary to keep the service running securely and to record changes to your consents and to record access to your data.

We store this data securely. We use it only to make Upod work properly.

Only specially designated Utonomy employees have access to your username and the internet location of your personal data store. No one else. No one can see your password. We do not collect data we do not need.

5. Where your data is stored

Your data from point 4.1 is stored in your personal data store. This can be:

- a data store we create for you at SNDK, or
- a personal data store you have and link.

Utonomy and SNDK do not have access to the data in your data store. When necessary and technically possible, data in your data store is encrypted, meaning made unreadable. Only if you give a website, app, or (AI) service permission, the data is made readable and provided to that website, app, or (AI) service.

6. What we use your data for

We use your data:

- to provide Upod to you and make it work properly,
- to help you build your profile (if you want),
- to securely store your consents,
- to give other parties access to your data on your explicit instruction.

We can temporarily retrieve data from your data store to anonymize it in a secure environment and then create insights about the overall use of Upod by all users together.

These insights can be shared with third parties. They are completely anonymous and never contain information that can be traced back to you.

We never use your data for other purposes.

7. **When others get access to your data**

Only if you allow it yourself. We call this consent. You always see:

- what data can be viewed,
- by which website, app, or (AI) service,
- and for what purpose.

You can adjust or withdraw this at any time.

Another party may not store this data, share it with others, sell it, or use it for other purposes than you have given permission for. That is prohibited.

Unless you have explicitly given permission, we do not share identity data, so that the data you show cannot be linked to who you are.

8. **Our roles under the GDPR**

Sorry, this gets a bit legal, but we want to explain it as clearly as possible:

8.1 You are the data controller

You are the data controller for the data in your personal data store. This means you have full control over your own data.

8.2 Utonomy is sometimes also a data controller

Utonomy is the data controller for the data we need to make Upod work properly for you. This only concerns your username, password, the location of your personal data store (called WebID), and logs of your consents and data access that we are required to keep (due to the GDPR). This never concerns the content of your data store. You control that yourself (see 8.1).

8.3 Utonomy is a data processor of your data

Utonomy is a data processor of your data, only on your explicit instruction. This means we store, modify, delete, or show your data for you if you explicitly instruct us to do so.

So we are a processor when we:

- store, modify, or delete data in your personal data store for you,
- pass on data to services you have given permission for,

- store, modify, or delete your consents.

8.4 The role of Stichting Nederlandse Datakluis (SNDK)

SNDK is a data processor of your data for you as a user. They manage the storage of your data store but cannot view or use its content. SNDK ensures the storage of your data on your behalf. SNDK has its own privacy statement.

See(<http://www.datakluis.nl/privacy>)(<http://www.datakluis.nl/privacy>)).

8.5 Others can be processors of your data if you give permission

Other parties to whom you give access to your data are processors because they may use the data to tailor their service to your data. Utonomy concludes a data processing agreement with these parties on your behalf, in which all agreements between you and Utonomy, as stated in this document, are recorded, so that the other party must comply with them. If a party does not comply, it risks a fine.

9. How long we keep your data

We only keep your data as long as you use Upod.

If you delete your account, then:

- your Upod account at Utonomy is deleted,
- your data store at SNDK is deleted (if you use it), unless you indicate you want to keep your data store, or
- the link to your own data store is deleted (if you use it).

10. Security

We do what is reasonably possible to protect your data. Think of:

- encryption,
- access protection,
- modern security standards,
- logging of important actions.

11. Your rights

You always have the right to access the data Utonomy stores about you outside your personal data store. This is only your username and a register in which we keep track of the consents you have given, modified, and withdrawn for 12 months so that we can always prove that another party had your permission to view your data.

We never provide your password to anyone. You can always change it if you forget your password.

All other data and your consents are in your personal data store, and you can always view, modify, and delete them yourself.

You have the legal right to access the data we hold about you. You can contact us for this.

12. Data breaches

If something goes wrong with your data, causing it to fall into the wrong hands, we will notify you and immediately take steps to resolve the issue.

13. Communications

We communicate with you via email. We do this for three reasons:

- Necessary emails to use Upod. For example, sending you your verification code, giving you the option to reset your password, or notifying you about disruptions or issues.
- Monthly updates: We send you a monthly email to keep you informed about new features or new websites/apps where you can use Upod. Since it's important to know how and where you can use Upod, we send these emails based on our legitimate interest in keeping you well-informed. You can easily unsubscribe from these emails via a link at the bottom of the email.
- Marketing emails: We only send these emails if you've explicitly opted in. These emails inform you about special ways to use Upod or offers from our partners. You can opt in or out of these emails at any time.

14. Changes to this privacy statement

If we change anything in this statement, we will let you know in the app or via email.

15. Questions?

Feel free to ask. We are happy to help