

# **DRONE TWINS 360 PRIVACY POLICY**

Last updated: [8/12/2025]

This Privacy Policy explains how Aviotix Ltd, an Irish company (Company No. 790146), collects, uses, stores, and protects Personal Data when you use the DroneTwins360 platform, including websites, dashboards, upload portals, and processing pipelines ("Services").

Aviotix complies with the EU GDPR, the Irish Data Protection Act 2018, and the ePrivacy Directive.

# 1. Who We Are (Data Controller)

#### **Aviotix Ltd**

22 The Court, Carrickmines Manor, Dublin 18, Ireland

Email: legal@aviotix.eu

Aviotix is the Data Controller for account, subscription, communication, and billing data.

For uploaded datasets containing Personal Data, Aviotix acts as a Data Processor on behalf of the Customer.

# 2. The Data We Process

## 2.1 Account Information (Data Controller)

We collect and process:

- Name
- Email address
- Password (hashed)
- Organisation details (if applicable)
- Subscription tier and billing history
- Country and preferred language

### 2.2 Uploaded Input Data (Data Processor)

#### This includes:

- Images and videos
- Camera metadata (EXIF, GPS, GNSS, timestamps)
- Geospatial files
- LiDAR or photogrammetry inputs
- Any files you submit for processing



You retain full ownership of this data. We process it solely to provide the Services.

## 2.3 Technical and Usage Data

We collect:

- IP address
- Browser and device information
- System logs
- Processing job metadata (dataset size, time, GPU usage)
- Actions performed within the platform (upload, delete, process, download)

#### Purpose:

To provide secure access, prevent fraud, monitor performance, diagnose issues, improve the platform, and conduct analytics to understand feature usage and service performance.

### 2.4 Payment Information

Handled by third-party providers such as:

- Stripe
- Revolut
- Other payment processors used in future upgrades
- Direct invoicing for enterprise customers

Aviotix does **not store** or access full credit card numbers.

#### 2.5 Communication Data

Emails, support tickets, feedback messages, and issue reports.

## 2.6 Integrity & Anti-Fraud Processing

DroneTwins360 includes an **Integrity Engine** that analyses:

- EXIF and GNSS metadata consistency
- Evidence of manipulation, tampering, or data alteration
- Structural anomalies in dataset organisation
- · Quality signals indicating missing frames or improper capture

### This processing is:

- necessary to provide the core functionality of the platform, and
- part of Aviotix's legitimate interest in maintaining platform integrity, security, and reliability.



We do **not** use Integrity Engine analysis for unrelated profiling or marketing.

# 3. Legal Basis for Processing

We process Personal Data under the following GDPR legal bases:

## 3.1 Contractual Necessity (Art. 6(1)(b))

To:

- create and manage accounts
- process datasets
- generate Outputs
- provide support
- maintain subscription services

## 3.2 Legitimate Interests (Art. 6(1)(f))

To:

- secure the platform and conduct integrity checks
- detect fraud or misuse
- optimise performance
- ensure fair use of the Services
- analyse aggregated usage data to improve service quality

Aviotix has completed and documented Legitimate Interest Assessments (LIAs) for activities such as security monitoring, integrity verification, and fraud prevention to ensure user rights are protected.

## 3.3 Legal Obligations (Art. 6(1)(c))

To comply with:

- financial and tax regulations
- data protection laws
- aviation safety and reporting guidelines (where required)

## 3.4 Consent (Art. 6(1)(a))



#### For:

- · optional analytics cookies
- optional marketing communications
- any optional data-sharing tier or future marketplace participation

Consent can be withdrawn at any time.

# 4. How We Use Personal Data

We use Personal Data to:

- create, authenticate, and manage accounts
- store and process Input Data to generate Outputs (previews, meshes, orthos, videos, analysis)
- deliver notifications (processing results, errors, updates)
- improve the performance and reliability of the platform
- maintain security and prevent fraud
- provide support and resolve issues

We do not sell Personal Data.

We do **not** use your datasets to train unrelated Al models without consent.

# 5. How Uploaded Data Is Processed

Input Data is processed on:

- Aviotix-owned GPU servers
- Aviotix storage systems
- MEGA cloud storage (processed files only, in EEA regions unless otherwise agreed)

### Processing may include:

- reading metadata
- reconstruction, photogrammetry, or LiDAR workflows
- generating previews, orthos, videos, 3D models
- integrity assessment
- analysis tools

# 6. Data Sharing



### **6.1 Service Providers**

We share only what is necessary with:

- Hosting and storage providers
- GPU infrastructure vendors
- Monitoring and security tools
- Payment processors (Stripe, Revolut)
- Email delivery and communication systems

All providers are selected for GDPR compliance.

## 6.2 Legal or Safety Requirements

We share data only if required by:

- law enforcement
- court orders
- regulatory authorities
- aviation safety authorities (if applicable)

### 6.3 Affiliates & Resellers

To support customers regionally, Aviotix may share **only the minimum necessary account and billing data** with authorised representatives, such as:

- company name
- contact email
- subscription tier
- region
- support notes (if relevant)

#### Purpose:

Customer support, onboarding, and account assistance.

#### Legal basis:

Legitimate interests (Art. 6(1)(f)), as this sharing allows Aviotix to provide regional customer support while protecting user privacy.

No payment card details or datasets are ever shared with affiliates.

# 7. Data Retention

#### 7.1 Account Data

Retained for the duration of your account and deleted upon request unless legally required to keep it.



### 7.2 Input Data & Outputs

Retention depends on:

- your Subscription tier
- storage limits
- processing limits

#### **Default retention:**

Input Data and Outputs are retained for 90 days unless:

- · deleted earlier by the user,
- · extended by your tier limits, or
- specified otherwise in your subscription or enterprise contract.

Users may delete datasets at any time.

## 7.3 After Cancellation or Failed Payment

Datasets remain accessible via your account for a limited reactivation period defined by your tier or Aviotix's GDPR retention policy.

After expiry, data may be permanently deleted.

#### 7.4 After Retention Period Ends

Data may be permanently deleted and cannot be recovered.

# 8. Cookies & Tracking

We use:

- · essential cookies
- security cookies
- analytics cookies (if consent is given)
- performance monitoring tools

A separate Cookie Policy defines details and consent options.

# 9. International Transfers



#### Data is stored in:

- Ireland
- EEA locations
- MEGA storage regions (EEA by default; enterprise customers may choose other regions)

If data is transferred outside the EEA, we use:

- Standard Contractual Clauses (SCCs)
- · equivalent safeguards

# 10. Your GDPR Rights

You have the right to:

- access your data
- · correct inaccurate data
- delete data ("right to be forgotten")
- restrict processing
- object to certain processing
- data portability
- withdraw consent (where applicable)
- lodge a complaint with the Irish Data Protection Commission

Requests: privacy@aviotix.eu

# 11. Security Measures

#### Aviotix uses:

- encryption in transit and at rest
- MFA (optional)
- access control
- network isolation
- intrusion prevention
- logging and monitoring
- dataset integrity verification

No system can guarantee 100% security, but we implement industry-standard safeguards.



# 12. Children

DroneTwins360 is **not intended for individuals under 16**. We do not knowingly process children's data.

# 13. Public Communications & Fair Use

Users agree to:

- contact Aviotix before making public claims about Output quality
- allow investigation of dataset issues
- refrain from publishing false or misleading statements
- cooperate in resolving performance or quality concerns

Aviotix may correct public misinformation to protect its reputation.

# 14. Updates to This Policy

We may update this Policy as the platform evolves. Material changes will be communicated via email or platform notice.

# 15. Contact

For privacy questions:

privacy@aviotix.eu